

1 TYLER DUGGER, Intern – County Attorney
2 JENNIFER CLARK, Chief Deputy County Attorney
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4 Missoula County Attorney
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7 (406) 258-4737
8 Attorneys for Plaintiff

*please file
in Dept
3*

FILED OCT 03 2014

SHIRLEY FAUST, CLERK
By *[Signature]* Deputy

7 MONTANA FOURTH JUDICIAL DISTRICT COURT, MISSOULA COUNTY

8 STATE OF MONTANA,
9 Plaintiff,

-vs-

10 WILLIAM M WINDSOR,
11 Defendant,

Dept. No 3
Cause No. DC-14-509

John W. Larson

AFFIDAVIT AND MOTION FOR
LEAVE TO FILE INFORMATION

12 STATE OF MONTANA)
13 County of Missoula) :ss

14 Tyler Dugger, Intern – County Attorney, and Jennifer Clark, Chief Deputy
15 Prosecutor, of Missoula County, Montana, being first duly sworn, moves the Court for
16 leave to file an Information charging the above-named Defendant with allegedly
17 committing the offense(s) in Missoula County of COUNT I: VIOLATION OF ORDER OF
18 PROTECTION - 1ST OFFENSE, a Misdemeanor, in violation of Montana law, namely:
19 Mont. Code Ann. 45-5-626(3)[1st]; COUNT II: VIOLATION OF ORDER OF
20 PROTECTION - 2ND OFFENSE, a Misdemeanor, in violation of Montana law, namely:
21 Mont. Code Ann. 45-5-626(3)[2nd]; COUNT III: VIOLATION OF ORDER OF
22 PROTECTION - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of Montana

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1 law, namely: Mont. Code Ann. 45-5-626(3)[3rd]; COUNT IV: VIOLATION OF ORDER
2 OF PROTECTION - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
3 Montana law, namely: Mont. Code Ann. 45-5-626(3)[3rd]; COUNT V: VIOLATION OF
4 ORDER OF PROTECTION - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation
5 of Montana law, namely: Mont. Code Ann. 45-5-626(3)[3rd].

6 The Motion is based upon the following facts which have been obtained from
7 reports of law enforcement and discussions with victims which, if true, I believe,
8 constitute sufficient probable cause to justify the filing of the charges. The facts from
9 those reports are as follows:

10 On August 23, 2013, Sean Boushie met with Detective Chris Shermer, Missoula
11 Police Department. Boushie reported that at the hands of William Windsor he had been
12 the victim of a substantial online harassment campaign. On or about this time, Windsor
13 was in Missoula, Montana. On August 21, 2013, Municipal Court Judge Warren granted
14 Boushie a Temporary Order of Protection. The order was to remain in effect until
15 September 16, 2013, unless continued at hearing. Windsor appealed to both District
16 Court and subsequently the Montana Supreme Court. Judge Larson and the Montana
17 Supreme Court both upheld the protective order. To date, an initial hearing has yet to be
18 held. However, per Judge Larson's November 14, 2013, to the original Order of
19 Protection remains in effect until modified by the Municipal Court.

20 The order protects Sean M. Boushie, Wynette L. Boushie, and the University of
21 Montana and its staff. Windsor was barred from harassing, annoying, disturbing the
22 peace of, calling, emailing, contacting, or otherwise communicating directly or indirectly,

1 with Sean M. Boushie, Wynette L. Boushie, and the University of Montana Staff. Further,
2 Respondent was ordered to release www.seanboushie.com to Sean M. Boushie.
3 Windsor was barred from posting petitioners name online.

4 On May 4, 2014, Windsor posted on his website, www.lawlessamerica.com, an
5 article, authored by himself, which lists Sean Boushie's name three times.

6 On July 4, 2014, Windsor posted on his website, www.lawlessamerica.com, an
7 article, authored by himself, which lists Sean Boushie's name once

8 To date, control of the website www.seanboushie.com has not been released to
9 Sean Boushie.

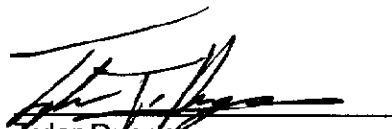
10 On December 30, 2013, Winsor posted a video on his Twitter account. The title
11 reads "Bill Windsor is banned from the University of Montana and Sean Boushie.
12 Corruption at its finest."

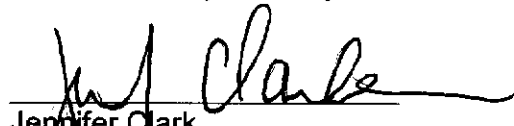
13 On February 6, 2014, Claudia Denker-Eccles, Associate Counsel for the
14 University of Montana, received an email from Bill Windsor [Nobodies@att.net].

15 All five instances constitute individual violations of the Order of Protection.

16 This case is being filed direct into District Court.

17 DATED this 3rd day of October, 2014.

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Tyler Dugger
Intern – County Attorney

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22 Jennifer Clark
Chief Deputy County Attorney

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SUBSCRIBED AND SWORN TO before me this 2nd day of October, 2014.

(SEAL)

Crystal Franchuk
NOTARY PUBLIC FOR STATE OF MONTANA

