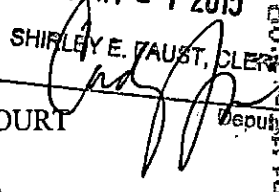


FILED JAN 21 2015
SHIRLEY E. FAUST, CLERK
By 
JAN 21 11:00 AM

CAUSE NO. DC-14-509

STATE OF MONTANA
V
WILLIAM M. WINDSOR

§ FOURTH JUDICIAL DISTRICT COURT
§ DEPARTMENT 3
§ MISSOULA COUNTY MONTANA

VERIFIED MOTION TO QUASH BENCH WARRANT

Now comes William M. Windsor ("William M. Windsor" or "Defendant") and files this Verified Motion to Quash Bench Warrant ("MOTION TO QUASH"), and shows the Court as follows:

INTRODUCTION

1. On October 3, 2014, Judge Karen Townsend issued a Bench Warrant calling for the arrest of William M. Windsor by "any Peace Officer of this State" claiming he committed five violations of a 20-day Temporary Order of Protection issued over 500 days ago. There was no explanation of what ANY of the alleged crimes were, and there was no "Order of Protection" referenced or attached. The Bench Warrant called for an arrest in Missoula County or another county in Montana.

2. The Bench Warrant must be quashed for a number of reasons.

- a. There is no valid order of protection, and the Temporary Order of Protection "TOP" that did exist was improper, had expired, and did not prohibit the actions that William M. Windsor has been charged with.
- b. William M. Windsor's Constitutional rights have been grossly violated.
- c. Judge Karen Townsend violated the law on bench warrants, and William M. Windsor was detained improperly as a result.
- d. The Montana and Texas extradition laws were violated due to Judge Karen Townsend's Bench Warrant, and William M. Windsor suffered as a result.
- e. Alleged Crime #1 is not a crime, and there was no violation of a protective order -- Publishing a legal document that contained the name of Sean Boushie, a defendant in civil action #88611 filed on December 26, 2013 in Ellis County Texas.
- f. Alleged Crime #2 is not a crime, and there was no violation of a protective order -- Publishing a legal document online that contained the name of a defendant in a lawsuit.

- g. Alleged Crime #4 is not a crime, and there was no violation of a protective order --
Using Twitter to send a Tweet.
- h. Alleged Crime #5 is not a crime, and there was no violation of a protective order --
Sending an email to an attorney.
- i. Alleged Crime #3 is not a crime, and there was no violation of a protective order -- Not
giving control of Bill Windsor's TV show website to Sean Boushie.
- j. William M., Windsor is the victim of fraud upon the court and corruption.

3. What's wrong with this picture?

Item	Sean Boushie	William M. Windsor
Threats Made	147	0
Murder Attempts	1	0
Stalking Emails Sent	88	0
Stalking Online Posts Made	648+	0
Cease & Desist Notices Received	24	0
Defamatory Online Posts Made	90	0
Perjured Statements Made	30	0
Protectors in Montana	1000	0
Protective Orders Granted	1	0
Crimes Committed	300+	0
Criminal Charges Received	0	5

4. Everything that has been done to William M. Windsor in and by Montana has taken corruption to a whole new level. The Bench Warrant is shameless. Hopefully Judge Karen Townsend will realize that she has been duped and perform an honest act and quash the Bench Warrant and all charges. Hope springs eternal.

5. The Affidavit of William M. Windsor dated January 16, 2015 ("AFFIDAVIT") is attached hereto as Exhibit A on the Flash Drive, which contains all exhibits to the AFFIDAVIT and to this MOTION TO QUASH. Exhibit 1 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of the Bench Warrant issued by Judge Karen Townsend that has been provided by the Clerk of the Court.

FACTUAL BACKGROUND

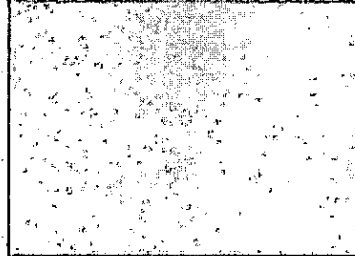


6. William M. Windsor is a senior citizen, a 66-year-old filmmaker who has never committed a crime in his life. He does not even have a traffic ticket or parking ticket in the last 15 years. He doesn't smoke, rarely drinks socially, doesn't drink and drive, has never struck anyone, has never killed an animal, has never shot at anything but a target, is absolutely non-violent, and has never used drugs of any type.



7. William M. Windsor publishes online publications, and is the producer of a documentary film and pilot for a proposed weekly TV series that will feature (expose) Sean Boushie. William M. Windsor is a card-carrying member of the press; has been a magazine publisher for most of his career; began his media work in high school; has been a radio and TV announcer and radio news reporter; formerly hosted a weekly TV news show. For the last several years, he has published online, and he has produced online radio and TV shows. He has over 1,200 news videos active at www.YouTube.com/lawlessamerica. William M. Windsor worked for several months on a TV special about Sean Boushie and the University of Montana. The alleged stalking consists solely of William M. Windsor filming his television news program and segments for a documentary film. [This is documented in Exhibits 41 and 65 in the folder on the Flash Drive named Missoula Montana Criminal Charges.]

8. In 2010, William M. Windsor had been married since college, with two grown children and two grandchildren, and had retired from a successful career as an entrepreneur and corporate CEO. William M. Windsor began to use the Internet to join with like-minded individuals in pursuit of his interest in exposing government, judicial, and law enforcement corruption. William M. Windsor developed a website called Lawless America. In furtherance of these interests, William M. Windsor spent over 200 days traveling across 49 states filming a documentary, and he spent in excess of \$200,000 on production of videos and the film. But in 2012, William M. Windsor learned that he and his work had been targeted for destruction by Sean Boushie, some other individuals, a group of people on Joeyisalittlekid.blogspot.com, and two related groups, the so-called American Mothers Political Party and the We the People Family Preservation Rally.



Sean Boushie

9. Sean Boushie is a serial cyberstalker who has terrorized William M. Windsor and his family. Sean Boushie is a serial liar, libeler, defamer, harasser, and criminal who has committed significant perjury in his Petition for a Temporary Order of Protection ("PTOP"). The photo used by Sean Boushie on his Facebook page is shown here.

10. Sean Boushie began cyberstalking William M. Windsor on March 7, 2012. Sean Boushie began threatening William M. Windsor on May 3, 2012. William M. Windsor first issued a cease and desist notice to Boushie on or about May 13, 2012. Many cease and desist notices were issued over the next 15 months. The Answer to the Petition for Protective Order filed by William M. Windsor on August 26, 2013 provides 28 pages of sworn testimony by William M. Windsor and 123 pages of exhibits that detail what had been done by Sean Boushie, and the Motion for Modification of the Protective Order filed on August 26, 2013 consists of 25 pages of sworn testimony by William M. Windsor and 140 pages of exhibits. [A true

and correct copy the ANSWER TO PETITION FOR PROTECTIVE ORDER OF SEAN BOUSHIE AND SWORN PETITION FOR PERMANENT ORDER OF PROTECTION BY WILLIAM M. WINDSOR is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-4.] [A true and correct copy of the MOTION FOR MODIFICATION OF TEMPORARY ORDER OF PROTECTION filed in the underlying case on August 26, 2013 where William M. Windsor asked the court to clarify the TOP is on the Flash Drive in the folder named DA-13-0785, four files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-3.] The Montana courts (Justice of the Peace Jim Bailey, Judge James A. Haynes, Judge Karen Jenks, Judge John W. Larson, Judge Michael E. Wheat, Judge Beth Baker, Judge Laurie McKinnon, Judge Patricia Cotter, Judge Jim Rice, and now Judge Karen Townsend) have had sworn testimony and evidence from William M. Windsor that has never been controverted in any manner by any sworn testimony, but they have done nothing. Corruption is the only explanation.

11. The AFFIDAVIT contains 70 of approximately 88 unwelcome cyberstalking emails that Sean Boushie sent to William M. Windsor, as many as 90 harassing published statements on William M. Windsor's websites, and approximately 648 published harassing and/or defamatory statements about William M. Windsor on Joeyisalittlekid.blogspot.com, as well as evidence of attempted murder by Sean Boushie, and physical stalking of William M. Windsor by Sean Boushie. The evidence attached to the AFFIDAVIT also contains proof that ties almost all of the emails to Sean Boushie-used email accounts. Essentially this same affidavit was filed at the Montana Supreme Court and in Judge John W. Larson's Missoula County Montana Fourth Judicial District Court in the protective order case, so he and the County Attorney's Office have known the true and undeniable facts.

12. William M. Windsor is the victim of by far the largest case of defamation in U.S. history. Sean Boushie has been a major participant in this. Sean Boushie is a member of a now-notorious gang called Joeyisalittlekid. 497 articles had been published on Joeyisalittlekid.blogspot.com through September 2014, with many more since then – targeting William M. Windsor with thousands and thousands of false and defamatory comments. The totality of the wrongdoing by the "Joeys," which includes Sean Boushie, is

simply immense. The 497 articles contain approximately 8,580 pages (printed in a very small font size) with approximately 48,935 comments from Joeys and others. [A true and correct copy of each of the articles and the comments published through September 2014 is in the folder on the Flash Drive named Blogspot.] [A true and correct copy of a list of the titles of the various articles is on the Flash Drive -- Exhibit 50 in the folder named Missoula Montana Criminal Case.] These articles brand the Defendant as a terrorist, murderer, Sovereign Citizen, crook, sexual deviant, and much more. Sean Boushie published at least 648 statements on this website between December 2012 and September 30, 2014. Sean Boushie published comments on 148 of the 227 days between January 2, 2013 and August 17, 2013. On or about April 10, 2013, Sean Boushie published that the Defendant had herpes and was cheating on his wife. This is absolutely false. Here's one of Sean Boushie's YouTube posts: "Anything William Windsor is involved with is bound to be a complete lie and a distortion of any reality. He is only showing his mentally disturbed and distorted one sided view of every story, most of it lies and less than half truth. Anyone stupid enough to support an extortionist, scam artist, elderly abusing scum like Crystal Cox is obviously not very intelligent and of dubious moral character. My bet is he wants payoffs from people to not extort them on YouTube a trick learned from Crystal Cox." In August and September 2012, Sean Boushie published that the Defendant was a liar, a nutcase, mentally disturbed, not very intelligent, and of dubious moral character. On January 5, 2013, Sean Boushie (using the alias of John Smith) published that the Defendant had a psychotic break and threatened the Defendant if he comes near him. On January 6, 2013, Sean Boushie (using the alias of John Smith on Joeysalittlekid.blogspot.com) implied that he will shoot the Defendant if he comes to Montana. On January 19, 2013, Sean Boushie slandered the Defendant with online posts that the Defendant is a dickless coward, mentally ill, and a pedophile. He also said: "bite me, asshole," and the email address used is gofuckyourself@yahoo.com. On February 10, 2013, Sean Boushie emailed the Defendant calling the Defendant a worthless piece of shit, an asshole, a pie loving fat ass, a scum sucking megalomaniac who is a perpetual liar and a sociopath....and more. Sean Boushie terrorized the Defendant's wife (now ex-wife) with threats of arrest. On February 10, 2013, Sean Boushie sent yet another email to the Defendant. He says shove it, go fuck yourself, suck my balls, bye asshole, and other obscenities. On March 9, 2013, Sean

Boushie threatened to run over the Defendant with a Mack truck. On March 18, 2013, Sean Boushie published that the Defendant should suck his balls. On March 21, 2013, Sean Boushie published that the Defendant is a fraud, a con artist, and a liar. On March 21, 2013, Sean Boushie published that the Defendant's wife (now ex-wife) and the Defendant were going to jail. On March 21, 2013, Sean Boushie published that the Defendant is psychotic, and he announced that he would be Allie Overstreet's bodyguard when the Defendant was in Missouri. On March 28, 2013, Sean Boushie published that the Defendant needs to go fuck himself, and more. On May 12, 2013, Sean Boushie published on the Lawless America Mississippi Facebook page that he predicted it is just a matter of time before the Defendant was murdered. Boushie offered a reward for the murder of the defendant. On June 14, 2013, Sean Boushie offered a reward if the Defendant was sent to the morgue in Arizona. There are hundreds of these. There are dozens of hate websites and Facebook pages and over 50 horrible videos. It is beyond comprehension that evil people like Sean Boushie can get away with publishing such things. All of the Montana judges were provided this evidence, and they all ignored it -- Justice of the Peace Jim Bailey, Judge James A. Haynes, Judge Karen Jenks, Judge John W. Larson, Judge Michael E. Wheat, Judge Beth Baker, Judge Laurie McKinnon, Judge Patricia Cotter, and Judge Jim Rice. There is only one explanation: These judges are corrupt, and they protect Sean Boushie. And now Judge Karen Townsend has charged William M. Windsor with five crimes for publishing the words "Sean Boushie" four times, sending an email to an attorney, allegedly sending a Tweet that contained the words "Sean Boushie," and having a website for the TV show that exposes Sean Boushie as a criminal and exposes Montana as the most corrupt state in America. Scurrilous.

13. Among the published statements about the Defendant that are false and defamatory include that the Defendant is a pedophile, a pedophile lover, anti-gay, a bigot, a tax evader, a criminal operating a scam, anti-American, a terrorist, a sexual deviant, has had sex with animals, a liar, a con man, a con artist, a huckster, created his movie as part of a con game, conning people, a fraud, a Hitler, Hitler-like, claims he has a movie but it a fake, had a psychotic break, threatened people with physical harm, a dickless coward, mentally ill, psychotic, insane, wants payoffs from people to not extort them on YouTube, has published complete lies, has published a distortion of any reality, mentally disturbed, showing a distorted one sided

view of every story, showing lies, showing less than half truths, not intelligent, of dubious moral character, his business has died, has no significant intellectual skills, a sociopath, had a woman sitting on his lap during filming in Michigan and was grabbing her on the ass, gets convicted sex offenders to do his filming, a maniacal monster, has herpes, falsifies information, was cheating on his wife; the Defendant and his wife (now ex-wife) are going to jail; supports cold-blooded killers; the Defendant's Washington DC event was a disaster; a terrorist, has lost his mind; the Defendant "has hurt so many through black mail, coercion and has threatened the safety of so many mothers and their children by sharing their intimate and confidential information." Other published statements that are defamatory include that the Defendant's movie does not and will not exist; he had been making up information about Sean Boushie for years; the itinerary with the movie was filled with pedophiles; he is a sexual deviant, a sick animal, moral-less, unethical, and a freak; is a psychopath; was fired for being a crook, is operating a scam, lies about anything and everything; there is no movie; is a monster; anything with the Defendant involved is bound to be a complete lie and a distortion of any reality; he is only showing his mentally disturbed and distorted one sided view of every story, most of it lies and less than half truth; anyone like the Defendant who stupid enough to support an extortionist, scam artist, elderly abusing scum like Crystal Cox obviously not very intelligent and of dubious moral character; he "has scammed people all his life." These are just a fraction of the defamatory statements and criminal accusations made by Sean Boushie and his online friends.

14. The Defendant is not now and never has been involved in criminal activity. The Defendant did not create his movie as part of a con game. Publishing that the Defendant is a terrorist is false. Publishing that the Defendant is crazy or has lost his mind is false. The Defendant is not a fraud. The Defendant is not a liar. Publishing that the Defendant is a con man is a criminal charge, and it is false. The Defendant is not a maniacal monster. The Defendant does not now and never has had herpes. The Defendant was not cheating on his wife. The Defendant is not a terrorist; terrorism is a crime. The Defendant has not committed any such crimes. The Defendant is not a sexual deviant. Publishing that the Defendant's movie does not and will not exist is false. Publishing that anyone who works with the Defendant will have their case destroyed at Joeyisalittlekid.blogspot.com is tortious interference. The

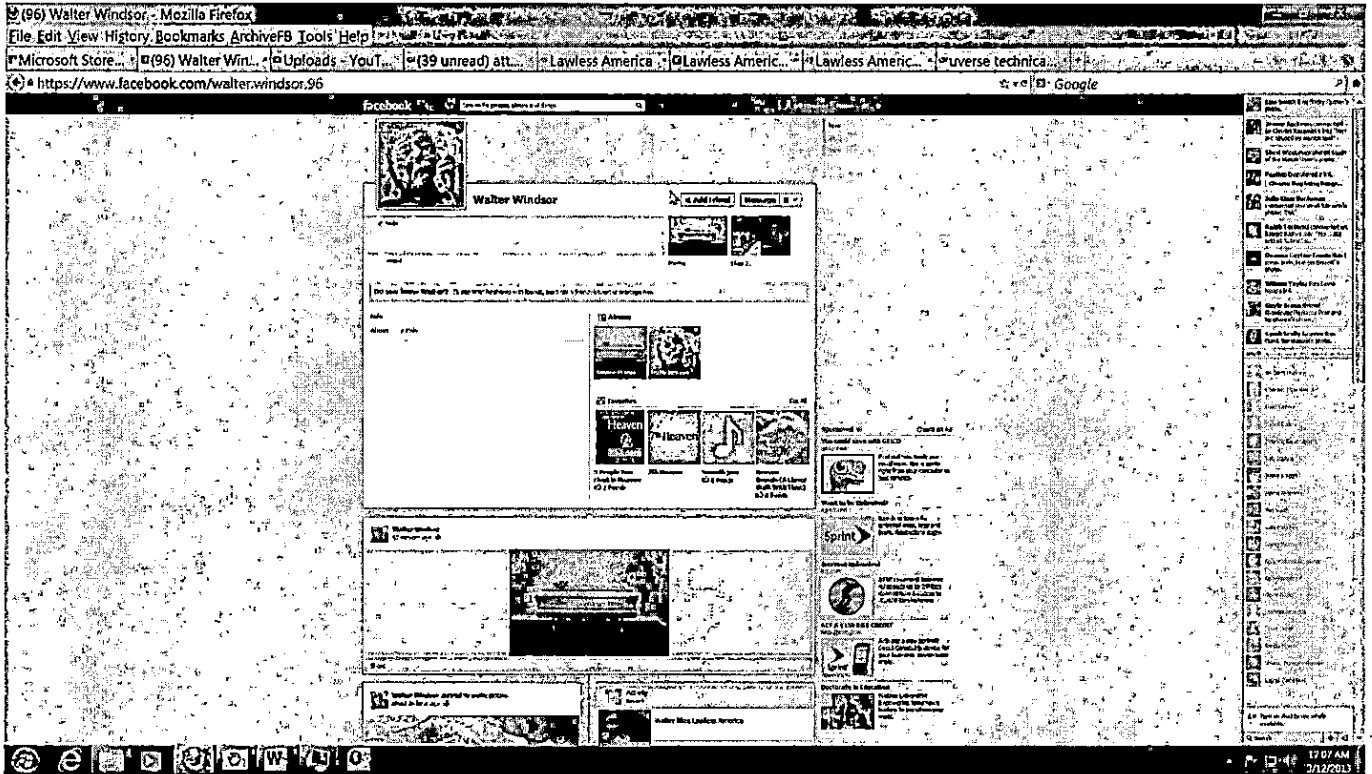
Defendant's movie is not a fake. The Defendant was never fired for being a crook. The Defendant is not now and never was operating a scam. The Defendant is not a monster. The Defendant is not a terrorist. The Defendant's business has not died. The Defendant has not "scammed people all his life." The Defendant has not scammed people at all. A report about the Defendant on Rip-Off Report contains statements that are false. The Defendant has never killed anyone, has never tried to kill anyone, has never planned to kill anyone, has never discussed killing anyone, has never proposed killing anyone.

15. William M. Windsor was happily married for over 40 years. His relationship with his children and grandchildren was always ideal. Now he is divorced, has no contact with his children, and is not allowed to communicate in any manner with his grandchildren. This devastation was caused by the cyberstalking, defamation, and threats of Sean Boushie of the University of Montana, and a group of others.

16. William M. Windsor does not know Sean Boushie. William M. Windsor has never attempted to be in his presence except when Sean Boushie was subpoenaed to appear for depositions (that he failed to attend). William M. Windsor has never known if Sean Boushie was anywhere near him. William M. Windsor has never "been at" Sean Boushie's house. William M. Windsor has never repeatedly driven by Sean Boushie's home. William M. Windsor has never been introduced to Sean Boushie. William M. Windsor has never called Sean Boushie or spoken with him on the telephone. William M. Windsor's sole communication with Sean Boushie has been by email and online posts plus some legal mail in recent months. William M. Windsor's emails to Sean Boushie consisted virtually entirely of cease and desist notices. Every email that he has ever sent to Sean Boushie is noted in the AFFIDAVIT attached hereto as Exhibit A. William M. Windsor has sent two (2) emails to Sean Boushie in three years. These emails are detailed in paragraphs 13 and 15 in the AFFIDAVIT.

17. Sean Boushie has sent approximately 88 unwelcome emails to William M. Windsor. These emails were sent using aliases such as killbill@yahoo.com, gofuckyourself@yahoo.com, and other graphic terms. Sean Boushie was sent 24 cease and desist notices, usually when copied on a complaint to Google or Yahoo. These emails are detailed in paragraphs 20, 27, 63, 141, 153, 175, 177, 184, 185, 193, 197, 205, 206, 207, 208, 209, 217, 259, 266, 268, 270, 273, 276, and 725 in the AFFIDAVIT. William M. Windsor also

published Cease and Desist notices online that he knows Sean Boushie has seen. Under Montana law, Sean Boushie's repeated unwelcome electronic communications constitute the criminal act of stalking, one of the most serious cases in history, but Sean Boushie is allowed to do anything he chooses.



18. Websites have been set up in the stolen identities of William M. Windsor's deceased parents. William M. Windsor believes Sean Boushie was involved in the set up these web pages. Photos taken from William M. Windsor's late father's tribute website include him in his death bed and in his coffin at the funeral home. Another page shows what is allegedly Walter Windsor's skeleton, and another page has a photo of him on his death bed allegedly having phone sex with his deceased wife, William M. Windsor's mother.

19. A Facebook site set up in the name of William M. Windsor's deceased mother, Mary Windsor, shows what is allegedly this wonderful mother's skeleton bones wearing a wig.



20. These stolen identities were then used to publish defamatory comments on Facebook about William M. Windsor as if they were being made by his deceased parents. [A true and correct copy of the Facebook page set up in the name of William M. Windsor's deceased mother is on the Flash Drive -- Exhibit 51 in the folder named Missoula Montana Criminal Case.] [A true and correct copy of the Facebook page set up in the name of William M. Windsor's deceased father is on the Flash Drive -- Exhibit 53 in the folder named Missoula Montana Criminal Case.] Facebook has continued to allow these pages despite complaints, so William M. Windsor lives every day with the desecration of the memories of his wonderful parents.

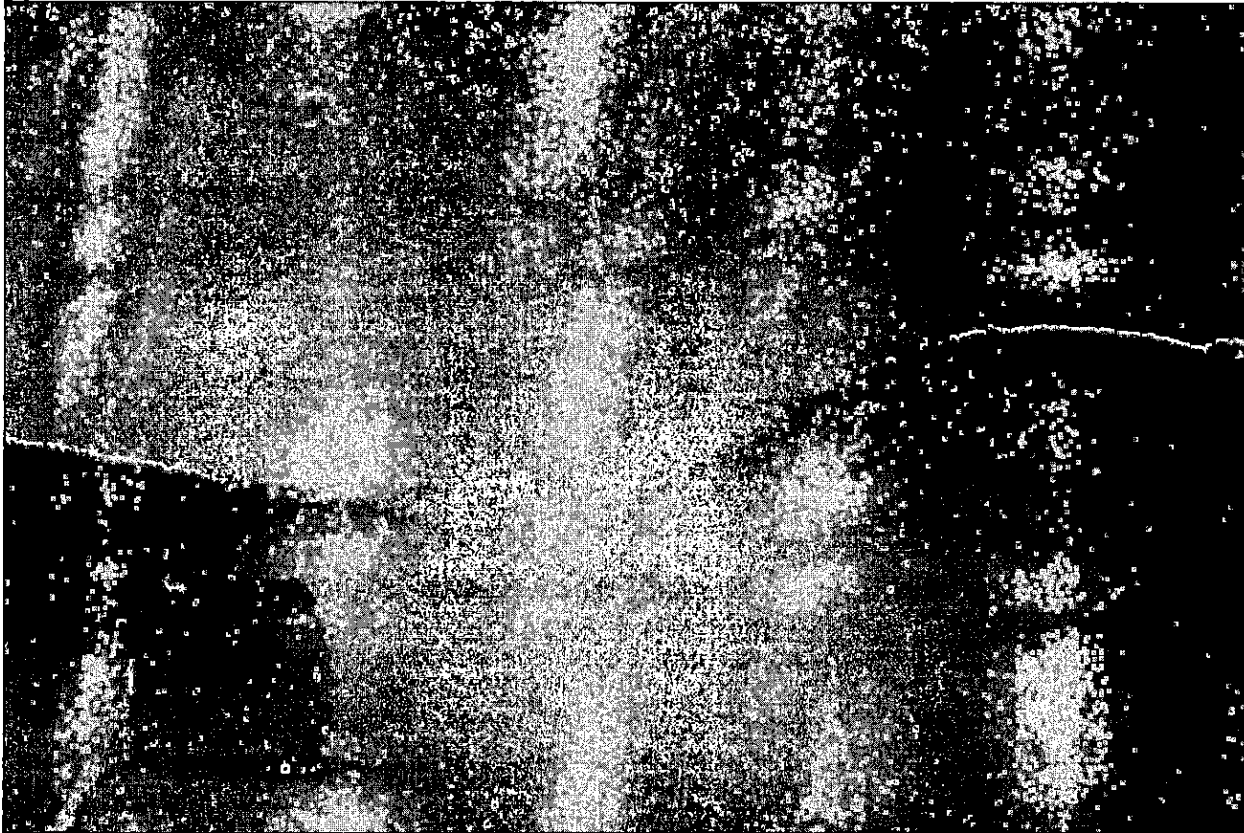
21. Sean Boushie has definitely been involved in setting up Facebook pages using stolen identities. He apparently set up Facebook pages in the name of Bill Windsor. He erected a large 3-foot x 8-foot sign at his home in Stevensville, Montana welcoming William M. Windsor to his home. The photo on the sign is the one on the fake Facebook page. [A true and correct copy of the Facebook page set up in the name of Bill Windsor is on the Flash Drive -- Exhibit 54 in the folder named Missoula Montana Criminal Case.] [A true and correct copy of the welcome Bill Windsor at the home of Sean Boushie is on the Flash Drive -- Exhibit 55 in the folder named Missoula Montana Criminal Case.]





22. Sean Boushie attempted to murder William M. Windsor. As William M. Windsor was driving down Interstate 90 on his way to Missoula Montana on August 4, 2013, a car in the lane to William M. Windsor's right burst into flames and smoke filled the road. William M. Windsor slowed up as did a car just ahead of him and undoubtedly everyone behind them. When the smoke cleared, William M. Windsor saw that the driver had pulled his car off onto the side of the road, and the car ahead of him pulled over as well.

23. Sean Boushie emailed William M. Windsor to take credit for shooting: "Here kitty kitty kitty.. Come on big fat kitty kitty... Come to mamma, you fat lying, asshole. Too bad I missed and hit that other car huh, I didn't know it would explode like that... By Coward."

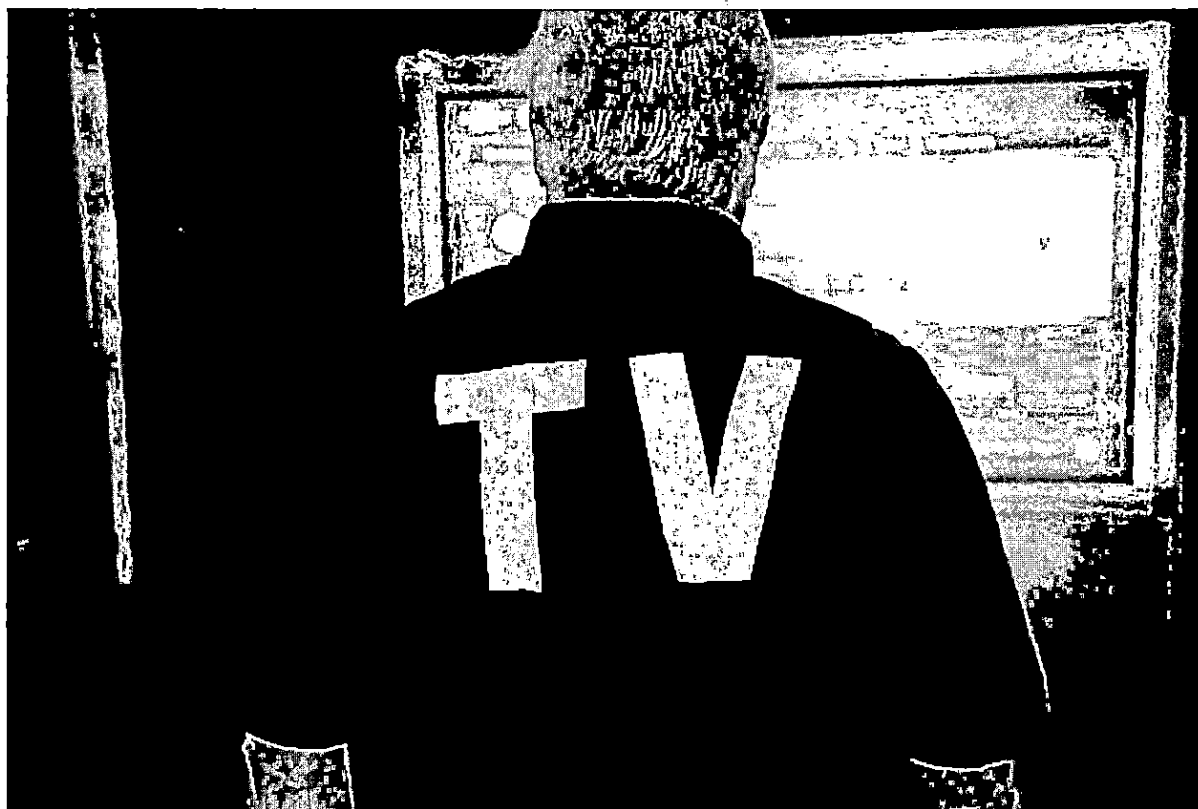


24. William M. Windsor grabbed his camera and snapped a photo through the windshield after he stopped his Jeep and waited for the smoke to start to clear. [A true and correct copy of the Photo of the smoke-filled highway is on the Flash Drive -- Exhibit 27 in the folder named Missoula Montana Criminal Case.] [A true and correct copy of the email sent to William M. Windsor by Sean Boushie admitting that he had shot at him and hit the other car is on the Flash Drive -- Exhibit 28 in the folder named Missoula Montana Criminal Case.]

From: William Windsore [mailto:billwindsore@yahoo.com]
Sent: Sunday, August 04, 2013 9:03 PM
To: nobodies@att.net
Subject:

Here kitty kitty kitty.. Come on big fat kitty kitty... Come to mamma, you fat lying, asshole. Too bad I missed and hit that other car huh, I didn't know it would explode like that... By Coward.

25. Between August 5, 2013 and August 10, 2013 while William M. Windsor was in Montana, he filed complaints with the Ravalli County Sheriff's Department, the Missoula Police Department, the University of Montana Police department, and the FBI about the stalking, harassment, defamation, attempted murder, and criminal activities of Sean Boushie. No one did anything. William M. Windsor filed petitions for protective orders against Sean Boushie in the municipal courts in both Ravalli County Montana and Missoula County Montana, and in the district courts in both counties. All were denied. The evidence was staggering. The only explanation for ignoring all of these crimes is that law enforcement and the courts in Missoula County Montana and Ravalli County Montana are corrupt, and they protect Sean Boushie who apparently does this type of criminal activity for them.



26. William M. Windsor filmed and worked on his movie and the pilot for his television show from August 4, 2013 until August 23, 2013 in Missoula County Montana and Ravalli County Montana. He wore a bulletproof vest with giant letters TV on the back, and he drove a boldly-signed Jeep painted with Lawless America movie artwork all over it. Not exactly stalker looks. [A true and correct copy of the photo of William M. Windsor in his bulletproof vest is on the Flash Drive -- Exhibit 37 in the folder named Missoula Montana Criminal Case.] [A true and correct copy of a photo of William M. Windsor's Jeep at the University of Montana Police Department in Missoula Montana when he was there filing a complaint against Sean Boushie is on the Flash Drive -- Exhibit 34 in the folder named Missoula Montana Criminal Case.]



27. [A true and correct copy of a photo of the back of William M. Windsor's Jeep is on the Flash Drive -- Exhibit 19 in the folder named Missoula Montana Criminal Case.]

I have never emailed Mr. Windsor, contrary to his claims.

28. On August 21, 2013, to obtain a protective order, Sean Boushie swore under penalty of perjury before a notary that he never emailed William M. Windsor. He wrote: "I have never emailed Mr. Windsor, contrary to his claims." [A true and correct copy of this is on the Flash Drive, Exhibit = 2013-08-21-Boushie-v-Windsor-Petition-for-Protective-Order – 10th unnumbered page.] The AFFIDAVIT provides evidence that proves Sean Boushie lied massively. He sent approximately 88 emails to William M. Windsor. On August 21, 2013, to obtain a protective order, Sean Boushie swore under penalty of perjury that he and his wife "do not feel safe at home or at work." [A true and correct copy of this is on the Flash Drive, Exhibit = 2013-08-21-Boushie-v-Windsor-Petition-for-Protective-Order – 9th unnumbered page.] The AFFIDAVIT reprints 38 published statements where Sean Boushie expresses that he does not fear William M. Windsor or where he invited William M. Windsor or taunted him to come to Montana. These are detailed in paragraphs 49, 64, 66, 80, 87, 120, 123, 146, 147, 159, 187, 189, 216, 217, 223, 224, 247, 306, 326, 335, 374, 386, 390, 392, 411, 533, 540, 549, 617, 624, 645, 653, 658, 695, 699, 722, 730, and 733 in the AFFIDAVIT. Here are some highlights:

"At this point I'm only worried about my coworkers, I can take care of myself." "I had some lead filled little pies all ready for him..." "We are locked and loaded here and ready." "fat ass Pie man, with his newly bought little gun. So scarred..." "Do you think hes going to come to Montana and do some filming?? Oh I hope so... better make it the last scene in your crapumentary..." "my wifes glocks are bigger than my glocks (note plurals). But my shotgun is bigger so its ok. Lol" "I justglad he didn't bring up my tank, or howitzer, or claymores, or hand grenades, or cannon..... Not kidding about the cannon.. 3" bore." "My Killing tools became necessary at that point." "I'm your biggest threat Bitler!!! Come get me koward." "Its going to get exciting soon, Ive only got 5 weeks to get ready!! Ive got things to sharpen, ammo to load, claymores to place, cannons to prime, adn land mines to lay down!! And a wife to control who is going to frag his fat ass at his first appearance!! I want firstiess!!!!" "Quit picking on women you dickless coward!!!! Montana!!! Come to. montana!!!!" "Come get me asshole, there won't be any drive by picture taking at my house asshole." "Pffffittt whatever fat man, bring it. I was born ready...." "I hope its somewhere I can get a good head shot!! Lol" "Ya fatass, I'm weally weally scarrwed." "I sleep like a baby, with a baby. the motion activated claymores woulda taken care of him.... :-)" "What a lying asshole.. Se are all sooo worried.. NOT. You are a coward and we all know it."

29. In paragraphs 695, 699, and 733 in the AFFIDAVIT, Sean Boushie admits physically stalking William M. Windsor while he was in Missoula Montana:

"I should mention, I found bitler tonight on my way home. I put 2 and 2 together from his little clues and swung through the parking lot. He's staying at a flea bag motel that the locals call the hooker hangout. Its had several escort and drug busts and several murders. Oh how far we have come.... I was going to get a picture but he was loading the toybota. Looks like he's outa here.... By by pietard." "The little pic is from his fb a day or so ago. "an interesting location" my truck is one space back from where the toybota was. The location was right behind the city police shop. I'm going to go see if we can file a false charges claim tomorrow." "Amazing!!!! I saw him in town today. I thought it was a regular missoula kook..."



30. And, on the day that Sean Boushie later went to the court to seek a temporary order of protection, he came outside his office building and paced around while talking on his cellphone just 100-feet or so from where William M. Windsor's unmistakable Jeep was sitting next to the street. Sean Boushie came out after he saw William M. Windsor's Facebook message that explained he had been outside filming to prove Sean Boushie was on campus when he was sending unwelcome emails to William M. Windsor. He knew William M.

Windsor was there. [A true and correct copy of a photo of Sean Boushie near William M. Windsor's Jeep on August 21, 2013 after William M. Windsor reported him to the police for stalking is on the Flash Drive -- Exhibit 20 in the folder named Missoula Montana Criminal Case.] Sean Boushie may be seen from 1:00:15 to 1:03:00 on the video taken and again at 1:06 pm. William M. Windsor immediately called the police. At 1:11:30, the University of Montana Police arrived. [A true and correct copy of the video is on the Flash Drive in the folder named "Lawless America Videos in Montana, Exhibit = Bill Windsor sting of Sean Boushie at the University of Montana.] [A true and correct copy of the police report is on the Flash Drive, Exhibit = 2013-08-21-11-13-00-AM-University-of-Montana-Police-Report.]

1 | **Firearms:** To the best of your knowledge, does the Respondent currently possess firearms? ☐ No ☒ Yes

2 | Where are the firearms located? On Person

31. On August 21, 2013, to obtain a protective order, Sean Boushie swore under penalty of perjury that William M. Windsor had a gun in Montana. He wrote "he claims to be carrying a firearm" and that he was carrying a firearm "on person." [A true and correct copy of this is on the Flash Drive marked as Exhibit A, Exhibit = 2013-08-21-Boushie-v-Windsor-Petition-for-Protective-Order – unnumbered pages 1, 3, 11.] As William M. Windsor has said before and will be happy to say while connected to a polygraph, he did not take a gun to Montana in August 2013 or at any time, and he never said he claimed to be carrying a firearm. William M. Windsor made this known to Judge Sam Brown and Missoula County Montana Judge John W. Larson in Exhibit 41 in the folder named Missoula Montana Criminal case, the Motion for Modification, ¶¶17 and 30. The AFFIDAVIT (Exhibit A hereto) includes two published statements where Sean Boushie notes that William M. Windsor published that he did not have a gun, paragraphs 638 ("First he said he no longer carried his judge gun.") and 642 ("I thought he got rid of his little gun...."). These statements were published on July 29, 2013 and July 31, 2014, when William M. Windsor was just about to arrive in Montana. [A true and correct copy of an article where William M. Windsor published that he would not be bringing a gun to Montana is on the Flash Drive in the folder "Facebook Downloads, in the subfolder Lawless America Facebook.] [A true and correct copy of the published statements of Sean Boushie noting that William M. Windsor would not have a gun in

Montana are on the Flash Drive in the folder named Blogspot -- Joeyisalittlekid.blogspot.com: tinyfeetnhands - July 29, 2013 at 9:25 PM Joeyisalittlekid.blogspot.com: tinyfeetnhands - July 31, 2013 at 12:00 AM.]

William M. Windsor's ex-wife can testify that the gun that William M. Windsor purchased for protection was in her home in Atlanta, Georgia from April 4, 2013 to December 6, 2013, and it was not in Montana in August 2013. This information was filed in the underlying case. [William M. Windsor swore that his ex-wife could testify that she had the gun in Georgia is on the Flash Drive -- Exhibit 29 in the folder named Missoula Montana Criminal Case, ¶23. Exhibit 56 is the Motion for Discovery filed August 18, 2014, and it explains this in paragraph 2 as a deposition by telephone is requested with his ex-wife.]

32. On August 21, 2013, to obtain a protective order, Sean Boushie swore under penalty of perjury in his PTO that he was in fear when William M. Windsor filmed at the University of Montana. Sean Boushie is a serial liar as is shown in paragraphs above.

33. The AFFIDAVIT provides massive evidence of cyberstalking, stalking, harassment, threats, and much more by Sean Boushie. Each numbered paragraph represents a separate incident, and there are 606 paragraphs detailing cyberstalking, stalking, harassment, threats, and much more by Sean Boushie. Paragraph 869 in the AFFIDAVIT explains how the many email addresses used, and the IP addresses from which they were sent, tie together to establish that virtually all of the emails sent were sent by Sean Boushie. Proving that Sean Boushie is the person who made approximately 462 published statements on Joeyisalittlekid.blogspot.com is even easier. (Each statement is in a separate paragraph in the AFFIDAVIT). In paragraphs 47, 68, 69, and 119, he admits the screen name of "John Smith" is actually Sean Boushie. In paragraph 253, 329, 429, 480, and 693, he admits the screen name of "tinyfeetnhands" is actually Sean Boushie or admits the email tinyfeetnhands@gmail.com.

34. Sean Boushie used proxy servers, and he published several times that this concealed his identity. (See paragraphs 77, 238, 243, and 357 in the AFFIDAVIT.) But Sean Boushie made a mistake. He used the same proxy server IP addresses many times under many different email addresses and aliases. This enabled William M. Windsor to prove that he sent the emails noted in the AFFIDAVIT. Judge Karen Townsend must compel Missoula law enforcement to subpoena the records of Google, Gmail, Yahoo, Blogspot.com,

Craigslist, Facebook, the University of Montana, and Sean Boushie's Internet, email, and telephone service providers. These will provide further proof that Sean Boushie committed serious perjury and false swearing in his PTOP. Judge John W. Larson denied any discovery to William M. Windsor and denied subpoenas as well. [A true and correct copy of the Motion for Discovery filed in the underlying case on August 26, 2013 is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-9.] [A true and correct copy of the Motion for Discovery filed in the underlying case almost a year later on August 18, 2014 is on the Flash Drive -- Exhibit 56 in the folder named Missoula Montana Criminal Case.] [A true and correct copy of the Request for Subpoenas filed in the underlying case on August 26, 2013 is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-6.] The only explanation for how Judge John W. Larson could deny discovery is corruption.

35. The AFFIDAVIT also provides evidence of how the University of Montana ignored all the reports of this activity by Sean Boushie and shows how the University of Montana enabled him in his illegal activities. There are approximately 40 paragraphs that set out notice to the University of Montana and the University of Montana's failure to do anything. 32 of the 88 emails sent to William M. Windsor by Sean Boushie were sent during weekdays between 8 am and 5 pm, times when William M. Windsor believes Sean Boushie was at work on the University of Montana campus in Missoula, Montana. [A true and correct copy of the complete analysis of the emails and IP addresses is on the Flash Drive, Exhibit = Email-Analysis-Spreadsheet. The dates, times, and days shown in light yellow are those that appear likely to have been sent from the University of Montana.] William M. Windsor has identified a number of University of Montana IP addresses in email and postings on his website. So, Sean Boushie was clearly stalking William M. Windsor from the University of Montana. [A true and correct copy of the Affidavit of William M. Windsor dated August 14, 2014 showing that Missoula County Montana Judge John W. Larson ignored this important evidence is on the Flash Drive -- Exhibit 49 in the folder named Missoula Montana Criminal Case.]

36. Sean Boushie has repeatedly threatened to hurt or kill William M. Windsor. [For example, see Exhibit 41, P.3, ¶8.] Sean Boushie sent William M. Windsor approximately 88 emails and published

approximately dozens of defamatory, harassing, and stalking comments online. Sean Boushie was sent numerous cease and desist notices to stop the stalking. Sean Boushie published an offer of a reward for William M. Windsor's murder. Sean Boushie has published that he shot at William M. Windsor in August 2013, missed, and hit a car next to William M. Windsor. [See Exhibit 41, P.2, ¶7.] Sean Boushie has committed approximately 300 counts of criminal acts. That William M. Windsor is a victim of stalking by Sean Boushie is easily proven. See Exhibit 41, P.4, ¶11-13; and Exhibit #'s thereto 3, 4, 11, 15, 16-A, 16-B, 16-C, 22, 24, 28 and Supreme Court records in DA 13-0540 and DA 13-0618.]

37. William M. Windsor exposed the wrongdoing of Sean Boushie through online publications, and he traveled to Montana to film a pilot for a proposed weekly television show that exposed Sean Boushie, the University of Montana, law enforcement, and judges in Ravalli and Missoula counties in Montana.

38. William M. Windsor's attempts to get a TOP against Sean Boushie were all denied; judges lied in orders; law enforcement ignored the overwhelming proof of crimes by Sean Boushie. And William M. Windsor was served with a TOP in favor of Sean Boushie because he filmed a television show in Missoula Montana, home of the University of Montana aka Cyberstalker U. [See Exhibit 41, P.3, ¶10 and Exhibit #2.]

39. Both the Missoula Municipal Court and the Missoula Montana Fourth Judicial District have violated numerous statutes and numerous clauses in the Montana Constitution and the U.S. Constitution. Issues include due process, freedom of speech, freedom of the press, rights to discovery, right to a jury trial when charged with a crime, and a host of errors regarding protective orders.

40. The TOP was fraudulently obtained with a perjured affidavit by Sean Boushie, a serial criminal. The TOP is an outrage. William M. Windsor did nothing whatsoever that constitutes stalking or assault. The TOP violates the First Amendment rights of William M. Windsor, who was filming a television news program about this criminal and the corruption at the University of Montana when the TOP interfered with this work and violated the Constitutional rights of William M. Windsor.

41. Montana Supreme Court cases DA 13-0540 and DA 13-0618 detail the efforts that William M. Windsor made and the sworn affidavits and evidence that William M. Windsor used in seeking protective

orders against Sean Boushie. Judge Karen Townsend is asked to take judicial notice of the record in these Supreme Court as those records contain even more sworn testimony and exhibits.

42. On August 21, 2013, Sean Boushie filed a PTOp against William M. Windsor in the Missoula Municipal Court. [Exhibit #13 in the folder named Missoula Montana Criminal Case.] The PTOp contains many counts of perjury and massive hearsay. These are addressed many times, including in the Answer filed by William M. Windsor on August 26, 2013 [DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-4 on the Flash Drive in the folder named DA-13-0785.] The Motion for Contempt and Sanctions filed on September 26, 2013 cites 18 counts of perjury by Sean Boushie. [A true and correct copy of the Motion for Contempt and Sanctions is Exhibit 61 in the folder named Missoula Montana Criminal Case.]

43. On August 21, 2013, Judge Sam Warren granted Sean Boushie's petition, and a so-called protective order was issued. [A true and correct copy of the Temporary Order of Protection and PTOp is on the Flash Drive -- Exhibit 13 in the folder named Missoula Montana Criminal Case.]

44. On August 23, 2013, William M. Windsor was served with the so-called protective order.

45. On August 26, 2013, William M. Windsor filed a sworn MOTION FOR MODIFICATION OF TEMPORARY ORDER OF PROTECTION in Missoula Municipal Court. [A true and correct copy of the Motion for Modification filed in the underlying case on August 26, 2013 where William M. Windsor asked the court to clarify the TOP is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case.] This details many of the problems with the TOP. It provides significant evidence of the stalking of Sean Boushie. It explains that William M. Windsor is a member of the press, that he had no weapon, that he never stalked Sean Boushie, that the PTOp contained extensive hearsay and perjured statements, that the TOP is a void order, that the TOP violates William M. Windsor's Constitutional rights, that the TOP is unintelligible, that the court did not have jurisdiction, that the TOP denied due process, and it repeatedly asks for the TOP to be modified. Missoula County Montana Judge John W. Larson proved how corrupt he is by ignoring the sworn testimony and evidence, but his failure to modify (clarify) the TOP means the Bench Warrant and these charges must be quashed.

46. On August 26, 2013, William M. Windsor filed a sworn Answer to the PTO. [A true and correct copy the Answer to the Petition for Temporary Order of Protection is on the Flash Drive -- is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-4.] This details many of the problems with the TOP.

47. On August 26, 2013, following the filing of his other motions, William M. Windsor filed an APPEAL to the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy of the Appeal from Missoula Municipal Court to the Missoula County District Court is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-5.]

48. On August 26, 2013, William M. Windsor filed a REQUEST FOR SUBPOENAS in the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy of some of the Request for Subpoenas is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-6.] The Clerk refused to issue the subpoenas.

49. On August 26, 2013, William M. Windsor filed a sworn REQUEST FOR JURY TRIAL in the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy of some of the Request for Jury Trial is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-7.] The request was denied by corrupt Judge John W. Larson.

50. On August 26, 2013, William M. Windsor filed a REQUEST FOR MENTAL EXAMINATION in the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy of some of the Request for a Mental Examination is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-8.] It was denied by corrupt Missoula County Montana Judge John W. Larson.

51. On August 26, 2013, William M. Windsor filed a MOTION FOR DISCOVERY in the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy of the Motion for Discovery filed in the underlying case on August 26, 2013 is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-9.] It was denied by corrupt Missoula County Montana Judge John W. Larson.

52. On August 26, 2013, William M. Windsor filed a MOTION FOR CONTINUANCE in the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy the Motion for Continuance is on the Flash Drive -- Exhibit 52 in the folder named Missoula Montana Criminal Case.]

53. On September 3, 2013, William M. Windsor filed a CIVIL ACTION COUNTERCLAIM in the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy the Civil Action Counterclaim is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-11.] This was ignored by corrupt Missoula County Montana Judge John W. Larson, but the Montana rules provide that William M. Windsor was entitled to file a counterclaim.

1 **HEARING**

2 A hearing on the Petitioner's request that this Court Order the Order of Protection continue for a specific

3 time or continue permanently will be held before this court on 09/16/13, the 16th day of September

4 2013, at the hour of 2:30 o'clock P.m., or as soon thereafter as the matter may be heard, in the following

5 courtroom:

<i>Municipal Court – City Hall</i>	<i>Justice Court I</i>	<i>Justice Court II</i>	<i>District Court</i>
<i>435 Ryman</i>	<i>200 W. Broadway</i>	<i>200 W. Broadway</i>	<i>200 W. Broadway</i>
<i>Missoula, MT</i>	<i>Missoula, MT</i>	<i>Missoula, MT</i>	<i>Missoula, MT</i>

6 This Temporary Order of Protection shall continue in full force and effect until 09/16/13, the 16th day of

7 September, 2013, at the hour of 11:59 o'clock P.m. unless continued at the hearing.

54. On September 11, 2013, AN ORDER WITH EXTENSION OF ORDER OF PROTECTION was issued by corrupt Missoula County Montana Judge John W. Larson. No hearing had been held, so the TOP could not be extended as per its explicit terms. There was never a hearing, so it expired on September 16, 2013, as clearly stated on the TOP. [A true and correct copy the Order to Assume Jurisdiction is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-12.] This Order was issued after the matter was "appealed," which actually means "removed" to the Fourth Judicial District Court in Missoula, Montana. That removal did not stop Judge John W. Larson from issuing this order, just as it did not stop the clock ticking on the 20 days. The TOP expired on September 17, 2013 because the required hearing was not held on September 16, 2013.

55. On September 12, 2013, an ORDER TO ASSUME JURISDICTION WAS ISSUED. [A true and correct copy the Order to Assume Jurisdiction is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-13.] This order was signed by Judge Karen Townsend, so she has prior knowledge of this case and should recuse herself.

56. On September 17, 2013, a REQUEST TO AFFIRM AND EXTEND ORDER OF PROTECTION WAS filed in the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy of the Request to Affirm and Extend Order of Protection is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-14.] There is no legal basis in Montana to extend a TOP by motion; a hearing was required, and no hearing was ever held. This "REQUEST" is unsworn and the exhibits are not authenticated or admissible.

57. On September 26, 2013, a MOTION FOR CONTEMPT AND SANCTIONS was filed in the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy the Motion for Contempt and Sanctions is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-15.] This details perjury of Sean Boushie in the Petition for TOP as does Exhibit 28 on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-28. This motion was ignored by corrupt Missoula County Montana Judge John W. Larson.

58. On September 26, 2013, RESPONSE TO REQUEST FOR HEARING was filed in the Fourth Judicial District Court in Missoula, Montana. A true and correct copy the Response is on the Flash Drive in the folder named DA-13-0785, four files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-16.]

59. On September 30, 2013, William M. Windsor filed a sworn MOTION FOR SUBSTITUTION OF JUDGE. [A true and correct copy the Motion for Substitution is on the Flash Drive in the folder named DA-13-0785, four files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-16-A.] This details wrongdoing by corrupt Missoula County Montana Judge John W. Larson

through this point in time. Surprise, surprise, corrupt Missoula County Montana Judge John W. Larson did not agree.

60. On September 30, 2013, William M. Windsor filed a sworn MOTION TO STRIKE. [A true and correct copy the MOTION TO STRIKE is on the Drive in the folder named DA-13-0785, four files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-16-B.] This details the hearsay in two filings by Sean Boushie's attorneys.

61. On September 30, 2013, William M. Windsor filed a sworn NOTICE OF FILING OF PETITION FOR EXTRAORDINARY WRIT IN MONTANA SUPREME COURT AND MOTION FOR STAY. [A true and correct copy the NOTICE OF FILING OF PETITION FOR EXTRAORDINARY WRIT IN MONTANA SUPREME COURT AND MOTION FOR STAY is on the Flash Drive in the folder named DA-13-0785, four files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-16-C.]

62. On September 30, 2013, A MOTION TO GRANT APPEAL was filed in the Fourth Judicial District Court in Missoula, Montana. [Exhibit#17.] [A true and correct copy the MOTION TO GRANT APPEAL is on the Flash Drive in the folder named DA-13-0785, four files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-17.]

63. On October 1, 2013, AN ORDER GRANTING EXTENSION WAS FILED in the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy the ORDER GRANTING EXTENSION WAS FILED is on the Flash Drive in the folder named DA-13-0785, four files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-18.]

64. On October 14, 2013, a sworn RESPONSE TO REQUEST TO AFFIRM AND EXTEND ORDER OF PROTECTION was filed in the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy the RESPONSE TO REQUEST TO AFFIRM AND EXTEND ORDER OF PROTECTION is on the Flash Drive in the folder named DA-13-0785, four files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-19.]

65. On October 21, 2013, a REPLY TO RESPONSE TO REQUEST TO AFFIRM AND EXTEND ORDER OF PROTECTION was filed in the Fourth Judicial District Court in Missoula, Montana.

[A true and correct copy the REPLY TO RESPONSE TO REQUEST TO AFFIRM AND EXTEND ORDER OF PROTECTION is on the Flash Drive in the folder named DA-13-0785, four files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-20.] This "REPLY" is unsworn and the exhibits are not authenticated or admissible. Nothing has been sworn by Sean Boushie since the perjury-filled Petition for Temporary Order of Protection.

66. On November 14, 2013, an ORDER AFFIRMING MUNICIPAL COURT RULING was entered in the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy the ORDER AFFIRMING MUNICIPAL COURT RULING is on the Flash Drive in the folder named DA-13-0785, four files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-21.] This is an outrageous order that could only be issued by a horribly corrupt judge, corrupt Missoula County Montana Judge John W. Larson. It contains at least 17 false statements that are proven false by the RECORD, and it violates the rules and the law again and again and again. Exhibit 28 on the Flash Drive in the folder named DA-13-0785 is a marked-up copy of this order to show the 17 false statements, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-28.

67. On November 18, 2013, a sworn MOTION FOR RECONSIDERATION TO DISTRICT COURT was filed in the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy the MOTION FOR RECONSIDERATION TO DISTRICT COURT is on the Flash Drive in the folder named DA-13-0785, four files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-22.]

68. On November 19, 2013, A MOTION FOR RECONSIDERATION TO DISTRICT COURT PROOF OF TRANSMISSION OF FILING was obtained. [A true and correct copy the MOTION FOR RECONSIDERATION TO DISTRICT COURT PROOF OF TRANSMISSION OF FILING is on the Flash Drive in the folder named DA-13-0785, four files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-23.] The Clerk confirmed receipt of this MOTION to WINDSOR, and receipt by the Clerk constitutes filing, but corrupt Missoula County Montana Judge John W. Larson wanted to block this evidence from the record, so he issued an order.

69. On November 19, 2013, a sworn MOTION FOR RECONSIDERATION TO MUNICIPAL COURT was filed in the Missoula Municipal Court. [A true and correct copy the MOTION FOR RECONSIDERATION TO MUNICIPAL COURT is on the Flash Drive in the folder named DA-13-0785, four files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-24.]

70. On November 19, 2013, a MOTION FOR RECONSIDERATION TO MUNICIPAL COURT PROOF OF FILING was obtained in the Missoula Municipal Court. [A true and correct copy the MOTION FOR RECONSIDERATION TO MUNICIPAL COURT PROOF OF FILING is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-25.]

71. On November 20, 2013, an ORDER DENYING FILING was entered in the Fourth Judicial District Court in Missoula, Montana. [A true and correct copy the ORDER DENYING FILING is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-26.] (See paragraphs 67-70 above.) So, corrupt Judge John W. Larson of Missoula, Montana had the Clerk of the Court falsify the docket to remove William M. Windsor's Motion for reconsideration. The Order purports to deny the filing. Corrupt Missoula County Montana Judge John W. Larson has no such power. The Clerk of the Court is obligated to docket what is filed. This is one of the many corrupt practices of judges such as corrupt Missoula County Montana Judge John W. Larson.

72. On November 20, 2013, a NOTICE OF FILING OF NOTICE OF APPEAL was filed. [A true and correct copy the NOTICE OF FILING OF NOTICE OF NOTICE OF APPEAL is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-27.]

73. The Missoula Municipal Court gave Sean Boushie a TOP without jurisdiction and based solely on lies. [This is documented on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-XX (Exhibit #'s 1, 2, 3, 4, 15, 16-A, 16-B, 16-C, 22, 24, 28.)]

74. The TOP restricts William M. Windsor from access to locations at the University of Montana, and it may restrict access to some people with the "U of M." It denies William M. Windsor possession of the gun he purchased for his protection following death threats by Sean Boushie and others. It may require William M. Windsor to give Sean Boushie Windsor's television show website, and it may limit William M. Windsor's rights to publish Sean Boushie's name. [A true and correct copy of the Temporary Order of Protection is on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-2.]

75. The TOP in this case was issued on August 23, 2013 and, according to the order and statute, it expired after 20 days.

76. No hearing was ever held. William M. Windsor filed motions for discovery and for a jury trial. They were denied. William M. Windsor filed a petition for temporary protective order, but it was ignored by the Fourth Judicial District Court by corrupt Missoula County Montana Judge John W. Larson.

77. Missoula County Montana Judge John W. Larson's wrongdoing and corruption has been extreme.

78. On November 20, 2013, an APPEAL was sent to the Montana Supreme Court. [A true and correct copy the APPEAL is on the Flash Drive -- Exhibit 57 in the folder named Missoula Montana Criminal Case.] [A true and correct copy of the Appellant's Brief to the Montana Supreme Court dated February 5, 2014 and 28 exhibits is on the Flash Drive in the folder named DA-13-0785.] The sworn Brief explained in paragraphs 60 to 81 that the record showed that the facts did not support a TOP, that it was based on massive perjury. Paragraphs 66 to 81 in the Brief identified each false or perjured statement by Sean Boushie and provided evidence. Paragraphs 82 to 105 in the Brief address the wrongdoing of Judge John W. Larson. Paragraphs 106 to 135 cites the many violations of William M. Windsor's Constitutional rights. Paragraphs 136 to 155 identified the procedural errors in the lower courts. Paragraphs 156 to 200 cited 12 errors of law. Paragraphs 201 to 204 argued that William M. Windsor had not violated the stalking statute. No honest judge could review the Brief and the exhibits and not vacate the TOP, assign another judge from another area of the state or assume supervisory control of the matter, and order a hearing. Any

reasonable, honest person who reads the sworn Brief would know that William M. Windsor's relief would be granted.

79. On December 26, 2013, William M. Windsor filed a civil action against Sean Boushie and others for defamation, defamation as a whole, civil conspiracy, invasion of privacy, intentional infliction of emotional distress, intentional infliction of emotional distress through digital impersonation, tortious interference with contractual relations and prospective business, stalking, and business disparagement. [A true and correct copy of the Third Amended Verified Petition in Case #88611 filed in the 40th Judicial District Court in Ellis County Texas is on the Flash Drive -- Exhibit 30 in the folder named Missoula Montana Criminal Case.] Legal Intern Tyler Dugger and Assistant Missoula County Attorney Jennifer Clark were completely aware of this action and the wrongdoing of Sean Boushie when they went to Judge Karen Townsend with their outrageous charges. They arranged to have William M. Windsor detained for 53 days as he left a hearing in that case.

80. On June 10, 2014, the APPEAL to the Supreme Court resulted in an opinion. Judge Michael E. Wheat, Judge Beth Baker, Judge Laurie McKinnon, Judge Patricia Cotter, and Judge Jim Rice did none of that. They refused the requested relief to vacate the TOP and said the matter was to be remanded to the Missoula Municipal Court (so a hearing could be held on whether there should be a permanent order of protection). The Montana Supreme Court did not dispute the mandatory 20 day requirement for a hearing.

contemplated by § 40-15-201(2)(j), MCA. Finally, the condition requiring Windsor to transfer SeanBoushie.com into Boushie's name and to refrain from posting about Boushie on the site is also permissible within § 40-15-201(2)(j), MCA, under the circumstances. The

81. Judge Michael E. Wheat, Judge Beth Baker, Judge Laurie McKinnon, Judge Patricia Cotter, and Judge Jim Rice did say that the TOP provided that William M. Windsor could not post about Sean Boushie on www.SeanBoushie.com. And he hasn't. The Montana Supreme Court failed to address most of the points that William M. Windsor made in his Brief, a routine practice of corrupt judges. At the very latest, on June 10, 2014, the clock began ticking again on the 20 days for the mandatory hearing. [A true and

correct copy of the Montana Supreme Court Opinion dated June 10, 2014 is on the Flash Drive -- Exhibit 64 in the folder named Missoula Montana Criminal Case.]

82. In July 2014, a hearing was set on the permanent order of protection in the Missoula Municipal Court. William M. Windsor did not receive notice of the hearing until he received a telephone call saying it was cancelled. It was cancelled because Sean Boushie filed to remove the case from the Missoula Municipal Court to the Fourth Judicial District Court in Missoula, Montana. William M. Windsor did not contest the removal as his review of the statute indicated that he had no basis to object.

83. On June 27, 2014, the 20 days expired for the mandatory hearing. At the very least, the TOP expired on that date.

84. On August 14, 2014, William M. Windsor filed a Motion for Discovery, a Motion to Dismiss, and the Affidavit of William M. Windsor dated August 14, 2014. [A true and correct copy of the Motion for Discovery is on the Flash Drive -- Exhibit 56 in the folder named Missoula Montana Criminal Case.] [A true and correct copy the Motion to Dismiss is on the Flash Drive -- Exhibit 29 in the folder named Missoula Montana Criminal Case.] Corrupt Missoula County Montana Judge John W. Larson ignored these.

85. Sean Boushie has committed many crimes. These were identified in each of the four petitions for temporary protective order that William M. Windsor filed. The criminal violations include the following:

- a. **Montana Annotated Code § 45-5-220. Stalking** "Defined As: Purposely and knowingly causes another distress or apprehension by repeatedly following or harassing, threatening, or intimidating."
- b. **Montana Annotated Code § 45-8-213. Privacy in communications.** (1) "Except as provided in 69-6-104, a person commits the offense of violating privacy in communications if the person knowingly or purpose" (a) "with the purpose to terrify, intimidate, threaten, harass, annoy, or offend, communicates with a person by telephone or electronic mail and uses obscene, lewd, or profane language, suggests a lewd or lascivious act, or threatens to inflict injury or physical harm to the person or property of the person. The use of obscene, lewd, or profane language or the making of a threat or lewd or lascivious suggestions is

prima facie evidence of an intent to terrify, intimidate, threaten, harass, annoy, or offend."

- c. **Montana Annotated Code § 45-5-201. Assault:** A person commits the offense of assault if the person: purposely or knowingly causes bodily injury to another; negligently causes bodily injury to another with a weapon; purposely or knowingly makes physical contact of an insulting or provoking nature with any individual; or purposely or knowingly causes reasonable apprehension of bodily injury in another. A person convicted of assault shall be fined not to exceed \$500 or be imprisoned in the county jail for any term not to exceed 6 months, or both."
- d. **Montana Annotated Code § 45-5-202. Aggravated assault.** "A person commits the offense of aggravated assault if the person purposely or knowingly causes serious bodily injury to another or purposely or knowingly, with the use of physical force or contact, causes reasonable apprehension of serious bodily injury or death in another."
- e. **Montana Annotated Code § 45-8-21. Criminal Defamation.** "Defamatory matter is anything that exposes a person or a group, class, or association to hatred, contempt, ridicule, degradation, or disgrace in society or injury to the person's or its business or occupation. Whoever, with knowledge of its defamatory character, orally, in writing, or by any other means, including by electronic communication, as defined in 45-8-213, communicates any defamatory matter to a third person without the consent of the person defamed commits the offense of criminal defamation and may be sentenced to imprisonment for not more than 6 months in the county jail or a fine of not more than \$500, or both."
- f. **Montana Annotated Code § 45-8-220. Criminal Invasion of Privacy.** "Except as provided in subsection (2), a person commits the offense of invasion of personal privacy if the person knowingly or purposely obtains or attempts to obtain personal or confidential information about an individual while posing as the individual. A person convicted under this section shall be incarcerated for a term not to exceed 1 year or fined an amount not to exceed \$10,000, or both."

- g. **Montana Annotated Code § 45-5-213. Assault with weapon.** "A person commits the offense of assault with a weapon if the person purposely or knowingly causes: bodily injury to another with a weapon; or reasonable apprehension of serious bodily injury in another by use of a weapon or what reasonably appears to be a weapon."
- h. **Montana Annotated Code § 45-5-208. Negligent endangerment.** "A person who negligently engages in conduct that creates a substantial risk of death or serious bodily injury to another commits the offense of negligent endangerment."
- i. **Montana Annotated Code § 45-5-203. Intimidation.** "A person commits the offense of intimidation when, with the purpose to cause another to perform or to omit the performance of any act, the person communicates to another, under circumstances that reasonably tend to produce a fear that it will be carried out, a threat to perform without lawful authority any of the following acts: inflict physical harm on the person threatened or any other person; subject any person to physical confinement or restraint; or commit any felony."
- j. **Montana Annotated Code § 45-7-202. False swearing.** "(1) A person commits the offense of false swearing if the person knowingly makes a false statement under oath or equivalent affirmation or swears or affirms the truth of a statement previously made when the person does not believe the statement to be true and: (a) the falsification occurs in an official proceeding; (b) the falsification is purposely made to mislead a public servant in performing an official function; or (c) the statement is one that is required by law to be sworn or affirmed before a notary or other person authorized to administer oaths."
- k. **Montana Annotated Code § 45-7-201. Perjury.** "(1) A person commits the offense of perjury if in any official proceeding he knowingly makes a false statement under oath or equivalent affirmation or swears or affirms the truth of a statement previously made, when the statement is material."

86. Sean Boushie threatened William M. Windsor approximately 147 times. These threats have been detailed in the AFFIDAVIT in paragraphs 16, 19, 37, 38, 46, 47, 49, 57, 58, 63, 66, 72, 80, 82, 84, 87,

96, 97, 98, 113, 117, 118, 122, 133, 134, 138, 139, 141, 146, 149, 151, 157, 159, 161, 186, 187, 188, 189, 191, 195, 217, 220, 223, 224, 229, 241, 247, 275, 277, 279, 284, 290, 304, 306, 307, 309, 311, 313, 314, 318, 320, 322, 326, 332, 338, 341, 343, 344, 346, 347, 350, 352, 368, 371, 376, 384, 385, 386, 387, 390, 393, 396, 397, 402, 403, 405, 406, 408, 412, 426, 431, 433, 435, 438, 440, 441, 445, 447, 451, 458, 459, 460, 461, 464, 469, 478, 494, 495, 504, 509, 513, 519, 523, 528, 532, 534, 540, 549, 558, 559, 561, 566, 568, 569, 570, 573, 580, 581, 582, 585, 596, 606, 624, 631, 632, 635, 647, 652, 655, 657, 712, 736, 765, 767, 768, 778, and 782.

In paragraphs 47, 187, 217, 736, he talks about his Glock. In paragraph 48, he talks about using the Montana Castle Doctrine for justification for shooting William M. Windsor. In paragraph 66, he indicates he will shoot William M. Windsor, paragraph 80 – bullets waiting, paragraph 87 – guns are loaded, paragraphs 122 and 133 – used Charles Manson photo, paragraph 408 – says he has a doll of William M. Windsor, stabbing it with his knife, paragraph 632 -- He should be very afraid. In paragraph 519, he talks of conspiring with Claudine Dombrowski: "Claudine, bring that .45 over, let's go shootin, ill bring 2 or 3 of my 45s." In paragraph 513, he said William M. Windsor's bulletproof vest won't do him any good, and in paragraph 494, Sean Boushie published: "Don't waste \$ on body armor billy, what I shoot goes right thru like buttter." Sean Boushie has said many times that he wishes William M. Windsor were dead – paragraphs 191, 631, 568, 371, 635, and 768. In paragraph 549, he talks about when William M. Windsor is in Missoula: "I hope it's somewhere I can get a good head shot." In paragraph 320, he said "I am your #1 threat you fat fuck. In paragraph 396, he said, it's "just a matter of time before William M. Windsor is murdered." In paragraphs 393, 405, 451, Sean Boushie talks about a reward if William M. Windsor is sent to the morgue. In paragraph 241, another of the Joeyisalittlekid users, his fellow cyberstalkers, said Sean Boushie published a video with a threat to kill William M. Windsor. In paragraphs 157, 347, 352, and 581, Sean Boushie talks about shooting William M. Windsor. In paragraph 582, he gives advice to his co-conspirators on what ammunition to use to shoot William M. Windsor. In paragraph 504, Sean Boushie says he was having a "Kill Bill" movie marathon. Paragraph 647 provides the email that Sean Boushie sent to William M. Windsor saying he shot at him on Interstate-90 in Montana that day and missed. [A true and correct copy of the email is on the Flash Drive -- Exhibit 28 in the folder named Missoula Montana Criminal Case.]

87. There was a goal in all the defamation, conspiracy, and other wrongdoing that William M. Windsor has experienced since starting his documentary film. That goal was to destroy the movie and William M. Windsor. Sean Boushie's associates at Joeyisalittlekid.blogspot.com have repeatedly indicated this as their goal. Sean Boushie's cyberstalking associates are believed to include the attorney for one of the Georgia federal judges that William M. Windsor has been exposing, Ellis County Texas District Attorney Patrick Wilson, Ellis County Texas Judge Bob Carroll and/or his wife Kathy, Ellis County Texas Sheriff Johnny Brown, Casey P. Hargrove, Sean D. Fleming, Sam Round, Megan Van Zelfden, Lisa Jones, Brannon Bridge, Allie Overstreet, Claudine Dombrowski, the American Mothers Political Party, Betsi Bixby, Melaine White, Albert Fiorini, Brandy Owen, Brenda Williamson, Carrie Walters, Cheryl Sosby, Curtis Baker, Dale Trowbridge, Deanna Kloostra, Deborah Parks, Ellis County District Attorney Patrick Wilson, Gail Lakritz, Jay Hoskins, Jennifer Dotson, Judge Bob Carroll, Kathy Carroll, Kellie McDougald, Kimberly Wigglesworth, Kinley Hardin, L Wilson, Loryn Ryder, Diane Gochin, Lorraine Tipton, Mary Bagnaschi, Michelle Stilipec, Nancy Rolfe, Renee Harrington, Shannon E. Miller aka Elizabeth Hope Hernandez, Ellis County Sheriff Johnny Brown, Sid Wallingford Gray, Stacy Emerson, Trinity Baker, University of Montana, Royce Engstrom, Claudia Denker-Eccles, Chief Gary Taylor of the University of Montana Police Department, and others. In an article written by the ringleader, "Ginger Snap," -- Casey P. Hargrove of Red Oak Texas in Ellis County Texas, on February 20, 2014, the goal is published right on page 2. William M. Windsor wrote on his Facebook page that Sean Boushie and the Joeyisalittlekid people "have all but killed Lawless America." Ginger Snap wrote: "good that was the goal...so no movie ever...got it." [True and correct copies of this article is attached to the Flash Drive marked as Exhibit A, in the folder named Joeyisalittlekid-blogspot, Exhibit = joeyisalittlekid-blogspot-com-blog-2014-02-20-The-Windsor-Report.] There are many other statements of the malicious intent in the Joeyisalittlekid.blogspot.com articles. And in paragraph 222 in the AFFIDAVIT, Sean Boushie admits that his goal has been for William M. Windsor's project to fail. [True and correct copies of the articles on this website are on the Flash Drive in the folder named Blogspot.]

88. Judge Sam Brown of Missoula Municipal Court in Missoula, Montana did not have any of this information when he signed the TOP. But Judge John W. Larson, Missoula Montana District Court judge, knew

much of this, and the Montana Supreme Court knew all of it. They should have said that the TOP had expired or was void, or they should have canceled it. Instead, they did nothing and pretended what Judge Sam Brown did was appropriate. Judge John W. Larson appears to be horribly corrupt judge who protects Sean Boushie. In addition, the Missoula Montana County Attorney was aware of all of this evidence against Sean Boushie. Yet with all of this evidence, the Missoula Montana County Attorney's Office came to Judge Karen Fitzgerald seeking to have William M. Windsor arrested for publishing Sean Boushie's name four times (8 words), sending an email to an attorney, and sending a Tweet that included Sean Boushie's name (2 words). So, 10 words, an email to an attorney, and a Tweet. Compare that to 88 unsolicited emails to William M. Windsor from Sean Boushie, 648+ harassing and/or defamatory posts on Joeysisalittlekid.blogspot.com, 90 other online posts, 147 threats, one attempted murder of William M. Windsor, and over 300 crimes committed. It is very clear that this is corruption at its worst. Sean Boushie is guilty of hundreds of serious crimes, and William M. Windsor has done nothing but expose Sean Boushie on his television show website.

89. William M. Windsor has been OUTRAGEOUSLY charged with five "crimes" by the "State of Montana" via the Missoula County Attorney's Office.



90. The Missoula County Attorney's Office conspired with the Ellis County Texas District Attorney's Office and Ellis County District Attorney Patrick Wilson to have William M. Windsor taken to the Ellis County Jail on October 28, 2014. William M. Windsor was illegally "detained." He was neither arrested nor read his rights. [A true and correct copy of William M. Windsor's mugshot is on the Flash Drive -- Exhibit 68 in the folder named Missoula Montana Criminal Case.]

91. The Missoula County Attorney's Office, corrupt Missoula County Montana Judge John W. Larson, or Judge Karen Townsend then conspired with the Ellis County Texas District Attorney Patrick Wilson and/or Ellis County Texas Sheriff Johnny Brown to have William M. Windsor held by denying the two bonds that he arranged to post. This was done in complete violation of both Texas and Montana laws and the Uniform Criminal Extradition Act. As a result of this outrageous action, William M. Windsor was illegally held in jail for 53 days.

92. Texas Law (the Uniform Criminal Extradition Act) required, at the very least, that William M. Windsor be discharged after 30 days, but he was held until he could finally get before a judge and present the facts and the law. The only "grounds for extension" past 30 days are that the District Attorney in the asylum state has to seek an extension, and it has to be done before the first 30 days expires. Ellis County District Attorney Patrick Wilson did not formally apply for an extension. William M. Windsor raised the 30-day issue on December 11, 2014 when he filed his First Amended Petition for Writ of Habeas Corpus. Judge Cindy Ermatinger allowed 30 days to expire, and Ellis County Texas District Attorney did not seek an extension. William M. Windsor demanded his release every day from Day 31 to Day 53. He formally sought his release by habeas corpus on December 11, 2014 and at the hearing on December 19, 2014. At the December 19, 2014 hearing, Ellis County District Attorney Patrick Wilson stated that a requisition had not been obtained from the Governor of Montana. (See Transcript, Page 9 Lines 17-24, Page 10 Lines 18, Page 11 Lines 19-25, Page 12 Lines 1-7, Page 13 Lines 3-10 -- Exhibit 39 in the folder named Missoula Montana Criminal Case.) [A true and correct copy of the report of all the violations of the law regarding this Bench Warrant is on the Flash Drive -- Exhibit 14 in the folder named Missoula Montana Criminal Case.] William

M. Windsor has learned even more since this was written. The illegalities of the Bench Warrant are addressed in paragraphs 176 to 181 below.

On day 31 Lovejoy filed a motion stating that his 30 days were expired and no extension had been sought. There was a hearing on Lovejoy's motion, where the judge denied the motion and went on to order recommitment for 60 days. The court had no authority to do that because it had allowed the first 30 days to expire. (*EUGENE LOVEJOY v. STATE VERMONT AND JOSEPH*, SUPREME COURT OF VERMONT, No. 87-137, 531 A.2d 921, 148 Vt. 239 (07/10/87).)

The laws in Montana and Texas are identical. "The authority for Montana officials to arrest a defendant wanted in another state for a crime is found in Section 46-30-227, MCA. If the defendant does not consent to extradition, he must be committed to the county jail for not exceeding 30 days or admitted to bail, Section 46-30-302, MCA, to provide time to obtain a requisition from the demanding state. Upon receipt of the requisition, the Governor of this state may then issue an arrest warrant against the defendant. Section 46-30-213, MCA. The 30-day period is a limitation upon the power of Montana to hold the defendant without a requisition from the demanding state when Montana proceeds against him under Section 46-30-227, MCA." (*State v. Campbell*, 761 P.2d 393, 233 Mont. 502 (Mont. 09/12/1988).) [emphasis added.]

"The Uniform Criminal Extradition Act[1] provides that an accused person may be committed for a period of thirty days until the requisition papers are forwarded from the demanding state.[2] However, if a warrant from the governor of the demanding state is not forthcoming the accused person must be discharged. In the case at bar, the thirty day period expired on May 9, 1975.[3] The instant situation is directly covered by the recent case of *Commonwealth ex rel. Knowles v. Lester*, 456 Pa. 423, 321 A.2d 637 (1974). Our supreme court there held: 'The clear intent of section 15 of the Uniform Criminal Extradition Act is that an alleged fugitive may not be committed for more than thirty days (footnote omitted) while awaiting the warrant of the governor of the demanding state. (citations omitted). . . . This failure to comply with the provisions of the Uniform Criminal Extradition Act, (citations omitted), energizes the statutorily-provided remedy *558 of habeas corpus. (citation omitted).' 456 Pa. at 428, 321 A.2d at 640-41. . . . Appellant was incarcerated for a period exceeding 30 days without the requisition papers from the demanding state being forwarded. We conclude he was entitled to have the writ of habeas corpus issue as the remedy for illegal confinement under the Act. The order of the lower court is reversed, the writ of habeas corpus is granted, and the detainer filed by the State of New Jersey is dismissed." (*COMMONWEALTH PENNSYLVANIA v. MANFRED HUDE*, SUPERIOR COURT OF PENNSYLVANIA, 364 A.2d 413, 242 Pa. Super. 555 (09/27/76).) [emphasis added.]

"We therefore find that in order for petitioner to have been released on a petition for writ of habeas corpus on the ground that he was held for 3 days without a proper court order while awaiting the issuance and service of the requisition warrant, he should have filed the same and demanded release prior to the service of the rendition warrant of the State of Illinois." (*People Ex Rel. Vasquez v. Pratt*, 322 N.E.2d 74, 24 Ill. App.3d 927 (Ill.App. Dist.3 01/13/1975).)

"Then under Section 15 of the Uniform Criminal Extradition Act (Code Ann. § 44-415; Ga.L.1951, pp. 726, 731) provides that if the examination before the judge or magistrate shows that the person held is the one charged, that he has fled from justice, the judge must by warrant reciting the accusation commit him to the county jail for such time not exceeding 30 days and specified in the warrant as will enable the arrest of the accused to be made under a warrant of the Governor on a requisition from the executive authority of the state from which he fled. The habeas corpus petition was filed on March 18, 1967, and a hearing thereon was set for March 25, 1967, wherein it

was shown that the requisition papers were in the hands of the governor of this state and the accused had requested a hearing before the governor nor before his warrant issued. Under these circumstances it was not error to refuse to release the accused and leave him in custody. (*Bearden v. State*, 155 S.E.2d 5, 223 Ga. 381 (Ga. 05/18/1967).) [**emphasis added.**]

93. William M. Windsor was repeatedly blocked in his efforts to be bonded or released in Ellis County Texas. [A true and correct copy of the First Amended Petition for Writ of Habeas Corpus is on the Flash Drive -- Exhibit 38 in the folder named Missoula Montana Criminal Case.]

24	THE DEFENDANT: I am extremely clausto --
25	claustrophobic so if it comes down to where a governor's

52

1	warrant is actually issued, I would hope that I might be
2	able to arrange to surrender myself in Montana as
3	opposed to being transported across the country, from
4	what I understand might be weeks, with a bunch of other
5	people being picked up in a cattle car. And I just
6	offer that as something to, you know, stuck -- stick in
7	the back of your mind as -- as something, and I have
8	hopefully retained counsel in Montana.

9	THE COURT: Thank you.
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4 I'm going to reset this case until January 21st, 2015 at
5 nine a.m. for the hearing. I am going to set a second
6 bond, extend the -- extend the days -- I can extend the
7 days up to 60 days, but I'm going to make the hearing on
8 January 21st, 2015. I want everybody in this courtroom
9 that morning. The hearing is at nine a.m. I'm putting
10 it on my conditions, Mr. Windsor. I'm going to have you
11 sign them in just a second.

12 The Court is going to grant a PR bond. The
13 PR bond is in the amount of \$100,000. You know what
14 that means. Show up.

15 THE DEFENDANT: Can you explain the PR
16 bond? Is that personal recognizance?

17 THE COURT: Yes, sir, it is.

18 THE DEFENDANT: Means if I don't show up I
19 owe you a hundred grand?

20 THE COURT: A hundred grand. Dollar for
21 dollar.

22 THE DEFENDANT: Sounds like a very fair
23 deal, Your Honor.

8 THE COURT: So be here on January 21st or
9 if you decide to drive, then Montana will call us and
10 let us know.

11 THE DEFENDANT: Okay.

12 THE COURT: Okay?

13 THE DEFENDANT: So sounds like it would be
14 acceptable if I were to decide to go there, turn myself
15 in, I'm not screwing up \$100,000 bond?

16 THE COURT: I do not think so. Looks like
17 from what I read in the code that you can turn yourself
18 in. Just don't be traveling on that day doing that.

19 THE DEFENDANT: I won't.

20 THE COURT: Might be -- you know, you're
21 claustrophobia, you might not want to do that.

22 All right. Anything further from the

94. William M. Windsor was released from the Ellis County Jail on December 19, 2014. It was supposed to be on a PR Bond that required that William M. Windsor appear for a hearing in Ellis County Texas on January 21, 2015 or surrender in Missoula, Montana prior to the time of the hearing. [Exhibit 4 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of the PR Bond.]

15 MS. MONTGOMERY: Correct. And then the
16 sheriff will have to approve it here when they get the
17 bond back over and then he'll sign -- Mr. Windsor will
18 have to sign this there in front of a deputy.

1 And he doesn't need to sign anything else
2 on the other paperwork -- the extradition paperwork
3 until he gets to the jail?

4 MS. MONTGOMERY: And I did let Chief know
5 when he gets to the jail. There will be a space he
6 needs to sign and then the jail needs to approve that.

7 THE COURT: Do I need to send that original
8 with the deputies to the jail?

9 MS. MONTGOMERY: Yes, Your Honor.

10 THE COURT: Okay. So I will keep a copy
11 here until they can switch with me?

12 MS. MONTGOMERY: The original bond will
13 have to be signed at the jail and processed. Then it
14 will be forwarded back to our office usually.

95. The PR Bond was not actually valid. William M. Windsor was simply released without being asked to sign anything at the jail as Ellis County Texas Judge Cindy Ermatinger said was required. [A true and correct copy of the Transcript of the December 19, 2014 Hearing is on the Flash Drive -- Exhibit 39 in the folder named Missoula Montana Criminal Case, Page 52 Lines 15-18, Page 57 Lines 1-14.]

96. William M. Windsor left Dallas, Texas en route to Missoula, Montana on December 29, 2014. He had every intent to surrender. He reserved a Missoula Montana extended stay hotel room for 30

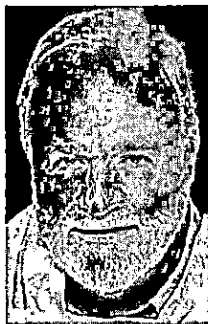
days, from January 20, 2015 through February 19, 2015. [Exhibit 3 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of the reservation.]

97. On December 30, 2014, a hearing was held in Ellis County Texas without notice to William M. Windsor, and the PR Bond was revoked because he was not there. The PR Bond clearly stated that William M. Windsor had to either appear in Judge Cindy Ermatinger's court in Ellis County Texas on January 21, or surrender in Montana prior to that date. This is absolutely crystal clear in the Transcript. The Transcript of the December 19, 2014 hearing shows the detailed discussion of this by Judge Cindy Ermatinger, and William M. Windsor's question to get it clarified. It is discussed several times. The hearing ends with Judge Cindy Ermatinger saying that William M. Windsor can turn himself in in Montana while discussing his claustrophobia and a reminder of the January 21, 2015 hearing in Ellis County as the alternative. [A true and correct copy of the Transcript of the December 19, 2014 Hearing is on the Flash Drive -- Exhibit 39 in the folder named Missoula Montana Criminal Case, Page 51 Lines 25-25, Page 52 Lines 1-8, Page 54 Lines 4-23, Page 55 Lines 5-7, Page 59 Lines 8-21, Page 60 Lines 3-7.]

WANTED

William Michael Windsor AKA: William M. Windsor

AKA: Bill Windsor



Age: 66
Date of Birth: October 2, 1948
Height: 6'
Weight: 240 pounds

Hair: Gray
Eyes: Green
Race: White
Nationality: United States

Windsor is wanted in the state of Montana for felony and misdemeanor offenses of violating an order of protection. He is contesting extradition from Texas to Montana. On December 23, 2014, Texas Governor Rick Perry, at the request of Montana Governor Steve Bullock, issued a warrant for the arrest of Windsor, so that Windsor may be returned to Montana to be dealt with according to law.

If you have information about Windsor's whereabouts please call the

Ellis County Sheriff's Office at: (972) 825-4901.

98. The Ellis County Texas District Attorney Patrick Wilson actually published a Wanted Poster for William M. Windsor – wanted for publishing a man’s name, sending an email, allegedly sending a Tweet, and filming a movie that will expose Ellis County Texas District Attorney Patrick Wilson as a dishonest and very corrupt elected official. [A true and correct copy of William M. Windsor’s Wanted Poster is on the Flash Drive -- Exhibit 60 in the folder named Missoula Montana Criminal Case.] WANTED: TWEETER.

99. William M. Windsor has now filed three appeals to the Texas Tenth Court of Appeals regarding the wrongdoing in the Ellis County Texas Court. [Exhibits 5, 6, and 7 in the folder on the Flash Drive named Missoula Montana Criminal Charges are true and correct copies of the appeals.]

100. William M. Windsor is now near Missoula, but he will give no further thought to surrendering himself on these bogus charges until (1) Judge Karen Townsend acts on this Motion to Quash and (2) the Tenth Court of Appeals acts on Windsor’s appeals.

101. William M. Windsor’s experience with law enforcement and the courts in Montana have proven to him that there is corruption at every level. Seemingly everyone in Montana protects Sean Boushie and allows him to commit hundreds of crimes. William M. Windsor has been victimized repeatedly by the various authorities in Montana. Rather than have this Motion to Quash surpass War and Peace, William M. Windsor attaches his AFFIDAVIT as Exhibit A hereto – on the Flash Drive, a document that explains what has happened; the Affidavit details all of the wrongdoing of Sean Boushie, and the Flash Drive contains all of the evidence.

102. The Missoula County Assistant Attorney refused to even tell William M. Windsor what he was charged with. No wonder; the words probably would have choked Missoula County Assistant Attorney Jennifer Clark and legal intern Tyler Dugger, the person who signed a sworn affidavit stating that William M. Windsor committed these crimes. [Exhibit 8 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of an email from Jennifer Clark where she refuses to provide the documents.] The Ellis County District Attorney Patrick Wilson stated to Judge Cindy Ermatinger in court that the only document the DA’s Office had was the Bench Warrant. [Exhibit 1 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of the Bench Warrant.]

ARGUMENT

A. THERE IS NO VALID ORDER OF PROTECTION, AND THE TEMPORARY ORDER OF PROTECTION THAT DID EXIST WAS IMPROPER, VOID, AND/OR EXPIRED, AND IT DID NOT PROHIBIT THE ACTIONS THAT WILLIAM M. WINDSOR HAS BEEN CHARGED WITH.

103. Missoula Municipal Court Judge Sam Brown issued a 20-day Temporary Order of Protection ("TOP") that was served on William M. Windsor on August 23, 2013. [Exhibit 13 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of the TOP and the Petition for the TOP by Sean Boushie.]

HEARING

A hearing on the Petitioner's request that this Court Order the Order of Protection continue for a specific time or continue permanently will be held before this court on 09/09/13, the 9th day of September, 2013, at the hour of 2:30 o'clock P.m., or as soon thereafter as the matter may be heard, in the following courtroom:

<i>Municipal Court – City Hall</i>	<i>Justice Court I</i>	<i>Justice Court II</i>	<i>District Court</i>
<i>435 Ryman</i>	<i>200 W. Broadway</i>	<i>200 W. Broadway</i>	<i>200 W. Broadway</i>
<i>Missoula, MT</i>	<i>Missoula, MT</i>	<i>Missoula, MT</i>	<i>Missoula, MT</i>

This Temporary Order of Protection shall continue in full force and effect until 09/16/13, the 16th day of September, 2013, at the hour of 11:59 o'clock P.m. unless continued at the hearing.

104. Page 1 of the TOP states that the TOP expired on September 16, 2013 unless it was earlier terminated by a court order. It was not terminated. It simply expired. It was signed on August 23, 2013. 20 days was September 13, 2013. William M. Windsor filed an appeal on August 26, 2013. The Montana Supreme Court remanded it on June 10, 2014. An "appeal" of a TOP is really just a change of court, so the TOP expired on September 16, 2013. If such an appeal extends the time, the TOP expired at the latest on June 27, 2014 when no hearing was held.

The court has jurisdiction over the parties and subject matter. The terms of this Order shall be effective until 09/16/13 at 11:59 PM/unless terminated earlier by another Court Order. By Judge Sam Warren

105. The TOP lists this date twice, stating very clearly that the order was effective only until September 16, 2013.

Protected Person/s. I am seeking an Order of Protection for (check all that apply):

☒ Myself.

☐ I am the parent, guardian or other person seeking an order on behalf of _____ who is in danger and in need of guardianship. Hereafter "T", "me" or "myself" refers to the person I am representing.

☐ The following minor child/ren:

Child/ren	Age	How child is related to: You	Respondent	Who does the child live with?

☒ Other people who have asked to be protected (must be victims of the abuse or have witnessed the abuse):

First Name	Last Name	Relationship to Respondent
Wynette E. Boushie	Boushie	Spouse

106. Page 1 of the TOP says the "Protected Persons" are Sean Boushie and Wynette Boushie.

Claudia Denker-Eccles did not apply for a TOP, yet Alleged Crime #5 is a charge that William M. Windsor sent an email to her. *Montana Annotated Code Section 40-15-102* shows that she was not eligible. Claudia Denker-Eccles emailed William M. Windsor on August 29, 2013 (6 days after the TOP was served), so she certainly was not in fear, though she has outrageously filed criminal charges against William M. Windsor for sending her a required service copy of a court filing in which she was an attorney of record. [On the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of the email from Claudia Denker-Eccles, Exhibit = 2013-08-29-12-31-00-PM-Sean-Boushie-Email-from-Claudia-Denker-Eccles.]

Relationship to the Respondent. (Please check all that apply to the relationship between the Respondent and you or the person(s) for whom you are seeking protection).

☐ Married or common law married

☐ Were married, but are now separated

☐ Divorced

☐ Are currently dating or having an ongoing intimate relationship

☐ Victim of Sexual Assault (no relationship required)

☐ Victim of Stalking (no relationship required)

☒ Victim of assault

☐ Other: (Describe how you know Respondent)

107. Page 1 of the TOP claims the Protected Persons were victims of stalking. Sean Boushie actually petitioned for the TOP claiming he was a victim of assault. This is an outrageous lie. The TOP was obtained based on malicious perjury by Sean Boushie who apparently knew he could get away with it. Extensive sworn testimony and evidence in this regard has been identified above. Judge John W. Larson

ignored this. The only reason Judge John W. Larson could have ignored this sworn testimony from William M. Windsor is because he is corrupt, and he knew he could get away with it.

1 **Firearms:** To the best of your knowledge, does the Respondent currently possess firearms? ☐ No ☒ Yes

2 Where are the firearms located? On Person

Petitioner's/Protected Person's Relationship to Respondent: check all that apply

- | | |
|--|--|
| <input type="checkbox"/> Married | <input type="checkbox"/> Victim of sexual assault |
| <input type="checkbox"/> Were married, but are now separated | <input checked="" type="checkbox"/> Victim of stalking |
| <input type="checkbox"/> Divorced | <input type="checkbox"/> Victim of assault |
| <input type="checkbox"/> Currently dating or having an ongoing intimate relationship | <input type="checkbox"/> Victim of other: _____ |
| <input type="checkbox"/> Live together | |
| <input type="checkbox"/> Lived together in the past | |
| <input type="checkbox"/> Have a child and/or children together | |
| <input type="checkbox"/> Family member or former family member of Respondent | |
| <input type="checkbox"/> Dated or had an ongoing intimate relationship in the past | |

CAUTION:

- ☒ Weapon Involved
☒ Weapon on Property

108. Page 1 of the TOP claims there was "Weapon Involved" and "Weapon on Property." This is false. Paragraphs 638 and 642 in the AFFIDAVIT show that Sean Boushie knew that William M. Windsor did not have a weapon, but Sean Boushie swore to Judge Sam Brown that William M. Windsor had a weapon on his person.

109. Page 2 of the TOP says the "2. Respondent must not harass, annoy, disturb the peace of, telephone, email, contact, or otherwise communicate directly or indirectly with Petitioner and the following Protected Persons: Wynette Boushie and "U of M Staff." U of M Staff was never defined. There was and is no legal basis to include a "U of M staff." The "U of M Staff" was not a petitioner, and does not qualify for protection under Montana law. – [A true and correct copy of the MOTION FOR MODIFICATION OF TEMPORARY ORDER OF PROTECTION filed in the underlying case on August 26, 2013 where William M. Windsor asked the court to clarify the TOP is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case.] The Montana law is addressed below.

22 14. ~~The Court~~ The Court deems that the following additional relief is necessary to provide for the safety and welfare of
 23 the Petitioner or other individuals designated in this Petition. Release of www.seanboushie.co
 24 To petitioner, Respondent shall not post
 25 Petitioner's name on liv

110. Page 3 of the TOP says: "14. The Court deems that the following additional relief is necessary to provide for the safety and welfare of the Petitioner or other designated individuals in this Petition: release of www.seanboushie.co to Petitioner; Respondent shall not post Petitioner's name on liv." William M. Windsor does not own www.seanboushie.co, so there is nothing to be released. The TOP says "on liv" or "on liu," or "on lit" or "on it" or "on iu." This is not defined. The TOP does not set any terms as to when this would be done. This is a matter that could not possibly be dealt with on an ex parte basis. No judge can take away someone's property just because a liar asks for it without even giving the property owner the right to speak. A website that exposes someone as a criminal is a Constitutional right, and elimination of it was not needed for the safety and welfare of Sean Boushie. www.SeanBoushie.com has been online ever since the TOP was served on August 23, 2013 – over 500 days, and Sean Boushie is still safe as he is allowed to continue to cyberstalk Windsor and others and commit more and more crimes. [A true and correct copy of the Motion for Modification filed in the underlying case on August 26, 2013 where William M. Windsor addresses the website is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case.]

1 **HEARING**
 2 A hearing on the Petitioner's request that this Court Order the Order of Protection continue for a specific
 3 time or continue permanently will be held before this court on 09/09/13, the 9th day of September,
 4 2013, at the hour of 2:30 o'clock P.m., or as soon thereafter as the matter may be heard, in the following
 5 courtroom:

Municipal Court – City Hall	Justice Court I	Justice Court II	District Court
435 Ryman	200 W. Broadway	200 W. Broadway	200 W. Broadway
Missoula, MT	Missoula, MT	Missoula, MT	Missoula, MT

 6 This Temporary Order of Protection shall continue in full force and effect until 09/16/13, the 16th day of
 7 September, 2013, at the hour of 11:59 o'clock P.m. unless continued at the hearing.

111. Page 4 of the TOP set a hearing for September 9, 2013. It was never held.

112. Page 4 of the TOP states that the TOP expired on September 16, 2013 unless continued at the hearing. There was never a hearing, and it did expire.

113. The handwriting on the TOP is that of Sean Boushie except where Judge Sam Brown entered dates and his signature. Sean Boushie wrote what he wanted, and Judge Sam Brown did not consider it very carefully, if at all. Simply reciting the contentions of the parties and reaching a legal conclusion does not satisfy the court's duty to make factual findings and conclusions of law under M. R. Civ. P. 52(a).

"The court must also make factual findings and combine those with a logical, reasoned analysis and application of the law to the facts." (*Snavelly v. St. John*, 2006 MT 175, ¶18, 333 Mont. 16, ¶16, 140 P.3d 492, ¶18; *Edelen v. Bonamarte*, 162 P.3d 847, 337 Mont. 407, 2007 MT 138 (Mont. 06/12/2007).)

M. R. Civ. P. 52(a) requires the court to "find the facts specially and state separately its conclusions of law" in all actions tried upon the facts without a jury. Requiring findings of fact under M. R. Civ. P. 52(a) serves to aid the trial judge's process of adjudication, to assist in the determination of res judicata and estoppel by judgment, and to help the appellate court on review. *Snavelly v. St. John*, 2006 MT 175, ¶ 16, 333 Mont. 16, ¶ 16, 140 P.3d 492, ¶ 16. The court's failure to state the findings of fact and conclusions of law in the recommended form does not constitute substantial error if the court's findings and conclusions are clear to Missoula County Montana Judge Karen Townsend. We consider "whether a district court's order sets forth reasoning, based upon its findings of fact and conclusions of law, in a manner sufficient to allow informed appellate review." *Snavelly*, ¶ 11. The District Court's order fails to set forth the court's support for its finding that Bonamarte caused Edelen "substantial emotional distress, if not reasonable apprehension of bodily injury, by repeatedly harassing, threatening, and intimidating her." The court's order simply refers to § 45-5-220, MCA, the stalking statute, and recites Edelen's testimony that she felt threatened by Bonamarte. Simply reciting the contentions of the parties and reaching a legal conclusion does not satisfy the court's duty to make factual findings and conclusions of law under M. R. Civ. P. 52(a). "The court must also make factual findings and combine those with a logical, reasoned analysis and application of the law to the facts." *Snavelly*, ¶ 18. The court's failure to enter findings of fact and conclusions of law, as required by M. R. Civ. P. 52(a), precludes Missoula County Montana Judge Karen Townsend from undertaking appellate review. We refuse to review the record with the purpose of making our own factual findings. *Snavelly*, ¶ 19. Missoula County Montana Judge Karen Townsend's function includes determining whether the district court abused its discretion in continuing the order of protection against Bonamarte. *Bock*, ¶ 29. We cannot carry out this task without a complete order from the District Court. We remand to the District Court for entry of findings of fact and conclusions of law as required by M. R. Civ. P. 52(a). (*Edelen v. Bonamarte*, 162 P.3d 847, 337 Mont. 407, 2007 MT 138 (Mont. 06/12/2007).)

114. Failure to issue findings of facts and analysis of law is a violation of the statute and Montana Constitution Section 16 - The administration of justice.

115. The TOP was issued ex parte, and it is based on a totally perjured affidavit by Sean Boushie. There are 20 Montana statutes and one Texas statute to consider to see that there is no valid order of

protection, and the TOP did not prohibit the actions that William M. Windsor is charged with violating.

These are presented below:

116. **TITLE 40. Family Law, Chapter 15. Partner and Family Member Assault, Sexual Assault, and Stalking – Safety and Protection of Victims, Part 1. General Provisions - Montana Annotated Code § 40-15-101. Purpose.** “The purpose of this chapter is to promote the safety and protection of all victims of partner and family member assault, victims of sexual assault, and victims of stalking.” None of the five alleged crimes could in any way affect the safety and protection of Sean Boushie or Wynette Boushie.

“Section 40-15-101, MCA, makes clear that the purpose of Title 40, chapter 15, MCA, is ‘to promote the safety and protection of all victims of partner and family member assault, victims of sexual assault, and victims of stalking.’ Section 40-15-201(1), MCA, allows a petitioner to seek a TOP if the petitioner is ‘in reasonable apprehension of bodily injury’; is a victim of stalking; and is in ‘danger of harm if the court does not issue a temporary order of protection immediately.’” (*Lear v. Jamrogowicz*, DA 12-0523, Supreme Court of Montana (Mont. 06/04/2013).)

117. **Montana Annotated Code § 40-15-102. Eligibility for order of protection.** “(2) The following individuals are eligible to file a petition for an order of protection against the offender regardless of the individual's relationship to the offender: (a) a victim of assault as defined in 45-5-201, aggravated assault as defined in 45-5-202, assault on a minor as defined in 45-5-212, stalking as defined in 45-5-220, incest as defined in 45-5-507, sexual assault as defined in 45-5-502, or sexual intercourse without consent as defined in 45-5-503;” Note that Sean Boushie’s Application for a TOP sought the TOP for assault. (See page 7 of the Application – Exhibit 13 in the folder on the Flash Drive named Missoula Montana Criminal Charges.) Sean Boushie was not eligible for an order of protection in Missoula County. There was no evidence of assault. William M. Windsor had never even seen Sean Boushie. This is explained in the Answer that William M. Windsor filed on August 26, 2013 and in many other filings since.

118. **Montana Annotated Code § 40-15-116. Definitions.** “As used in 40-15-115 through 40-15-121, the following definitions apply: (6) “Stalking” has the meaning provided in 45-5-220. (7) “Victim” means an individual who has been a victim of partner or family member assault, sexual assault, or stalking or who is otherwise eligible to file a petition for an order of protection under 40-15-102.” There was no

stalking by William M. Windsor. William M. Windsor was the Stalkee. There was no stalking of Claudia Denker-Eccles, and she was not eligible to file a petition for an order of protection.

119. **Montana Annotated Code § 40-15-117. Substitute address for participant -- application -- duties of department -- penalty.** “(1) A victim who is a resident of this state may apply to the department to have a substitute address designated by the department to serve as the official address of the applicant.”

Neither Sean Boushie, Wynette Boushie, nor Claudia Denker-Eccles sought this protection, so they have no legal right to complain about receiving legal mail. Claudia Denker-Eccles simply had no right whatsoever. This is just one of the many reasons why Alleged Crime #5 must be dismissed.

120. **Montana Annotated Code § 40-15-201. Temporary order of protection.** “(1) A petitioner may seek a temporary order of protection from a court listed in 40-15-301. The petitioner shall file a sworn petition that states that the petitioner is in reasonable apprehension of bodily injury or is a victim of one of the offenses listed in 40-15-102, has a relationship to the respondent if required by 40-15-102, and is in danger of harm if the court does not issue a temporary order of protection immediately.” Sean Boushie’s Application was perjured. Sean Boushie published repeatedly that he was not afraid. This has been well documented above. He’s a criminal who made all of this up. He lied claiming William M. Windsor had a gun and repeatedly came to his home. This is all absolutely false.

“Upon reviewing the allegations contained in the Petition, we agree with the District Court that Wetherill was not in immediate danger of harm. ... We conclude that the District Court did not err in dissolving the Temporary Order of Protection.” (*Wetherill v. Walters*, 299 Mont. 547, 4 P.3d 1220, 2000 MT 79 (Mont. 03/23/2000).)

“An order of protection may be issued if a district court determines that the petitioner needs permanent protection “to avoid further injury or harm.” Section 40-15-204(1), MCA. A temporary order of protection shall be issued if the petitioner is ‘in danger of harm if the court does not act immediately.’ Section 40-15-201(2), MCA. As there was ‘no credible evidence’ that Short harassed or intimidated Richards or that Richards was otherwise in danger of harm from Short, it was not an abuse of discretion for the District Court to refuse to grant an order of protection.” (*Richards v. Short*, DA 14-0273, 2014 MT 298N (November 12, 2014).)

121. **Montana Annotated Code § 40-15-201 (4):** “The court may, without requiring prior notice to the respondent, issue an immediate temporary order of protection for up to 20 days if the court finds, on the basis of the petitioner's sworn petition or other evidence, that harm may result to the petitioner if an order is not issued before the 20-day period for responding has elapsed.” A TOP is good for only 20 days, not over

500! The law is precise "for up to 20 days." The TOP expired after 20 days. There was absolutely no legal justification to pretend it was valid after 20 days. Corruption is the only reason anyone in Montana has pretended that there is an order of protection.

122. **Montana Annotated Code § 40-15-202 (1):** "A hearing must be conducted within 20 days from the date that the court issues a temporary order of protection. The hearing date may be continued at the request of either party for good cause or by the court. If the hearing date is continued, the temporary order of protection must remain in effect until the court conducts a hearing. At the hearing, the court shall determine whether good cause exists for the temporary order of protection to be continued, amended, or made permanent." There was never a hearing. The law is precise "A hearing must be conducted within 20 days from the date that the court issues a temporary order of protection." The TOP expired after 20 days. There was absolutely no legal justification to pretend it was valid after 20 days. Over 500 days is certainly not temporary, and there was never a show cause order or hearing. Corruption is the only reason anyone in Montana has pretended that there is an order of protection. [A true and correct copy of the Motion to Dismiss filed in the underlying case on August 14, 2014 in which William M. Windsor said the TOP had expired is on the Flash Drive -- Exhibit 29 in the folder named Missoula Montana Criminal Case.]

"MCA § 40-15-202(1) states that '[a] hearing must be conducted within 20 days from the date that the court issues a temporary order of protection,' wherein 'the court shall determine whether good cause exists for the temporary order of protection to be continued, amended, or made permanent.' ... Under § 40-15-202(1), MCA, a court must hold a show cause hearing before rendering its decision to deem permanent a temporary order of protection. A review of the record indicates that such a hearing did not occur. Hence, the Permanent Order of Protection and the Amended Permanent Order of Protection issued by the District Court was a manifest abuse of the District Court's discretion. Based on the foregoing, we reverse the District Court's order granting both the Permanent Order of Protection and the Amended Permanent Order of Protection. We order that the District Court vacate both the Permanent Order of Protection and the Amended Permanent Order of Protection." (*Coogler v. Coogler*, 321 Mont. 243, 90 P.3d 414, 2004 MT 122 (Mont. 05/06/2004).) [**emphasis added.**]

"Given the seriousness associated with a permanent order of protection, § 40-15-202(1), MCA, provides that a hearing must be conducted within 20 days from the date that the court issues a temporary order of protection." (*Keller v. Trull*, 158 P.3d 439, 337 Mont. 188, 2007 MT 108 (Mont. 05/08/2007).)

"Section 40-15-202(1), MCA, states that a hearing must be conducted within 20 days from the date the court issues a TOP. The purpose of the hearing is for the court to determine "whether good cause exists for the temporary order of protection to be continued, amended, or made permanent." The statute also provides that the hearing may be continued at the request of either party for good

cause or by the court. In summary, the TOP statutes contemplate a temporary order, followed quickly by a hearing, and continuation of the order as a temporary, amended, or permanent order of protection....” (*Lear v. Jamrogowicz*, DA 12-0523, Supreme Court of Montana (Mont. 06/04/2013).) [emphasis added.]

123. **Montana Annotated Code § 40-15-204. Written orders of protection.** “(1) The court may, on the basis of the respondent's history of violence, the severity of the offense at issue, and the evidence presented at the hearing, determine that to avoid further injury or harm, the petitioner needs permanent protection. The court may order that the order of protection remain in effect permanently.” There was never a hearing. William M. Windsor has no history of violence in 66 years. Nothing whatsoever. There was no offense by William M. Windsor, so severity would also be scored zero. This has been well-documented with sworn testimony. A “temporary” order of protection that exists for over 500 days is not temporary, and there is absolutely no legal or factual basis for there to be a permanent order.

“Section 40-15-204, MCA, states, ‘The court may, on the basis of the respondent's history of violence, the severity of the offense at issue, and the evidence presented at the hearing, determine that to avoid further injury or harm, the petitioner needs permanent protection. The court may order that the order of protection remain in effect permanently.’ Bock contends that he has no ‘history of violence,’ and that therefore the order of protection was improperly granted and made permanent.” (*Bock v. Smith*, 107 P.3d 488, 326 Mont. 123, 2005 MT 40 (Mont. 02/22/2005).)

(See also *In re Schiller*, 309 Mont. 431, 47 P.3d 816, 2002 MT 103 (Mont. 05/16/2002); *Richards v. Short*, DA 14-0273, 2014 MT 298N (November 12, 2014).)

124. **Montana Annotated Code § 40-15-204 (6)** “An order of protection must include a section that indicates whether there are any other civil or criminal actions pending involving the parties, a brief description of the action, and the court in which the action is filed.” There was nothing included in the TOP, so as it failed to meet the “must” requirement, it may not be considered to be an “order of protection,” and no self-serving “decision” by Judge John W. Larson or the Montana Supreme Court would qualify as an “order of protection.” (See Exhibit 13 in the folder named Missoula Montana Criminal Case.)

125. **Montana Annotated Code § 40-15-204 (7)** “An amendment to a temporary order of protection or to an order of protection is effective only after it has been served in writing on the opposing party.” William M. Windsor hereby swears that he was never served in writing with any amendment. So, there was no amendment.

126. **Montana Annotated Code § 45-5-220. Stalking -- exemption -- penalty.** (1) "A person commits the offense of stalking if the person purposely or knowingly causes another person substantial emotional distress or reasonable apprehension of bodily injury or death by repeatedly: (a) following the stalked person; or (b) harassing, threatening, or intimidating the stalked person, in person or by mail, electronic communication, as defined in 45-8-213, or any other action, device, or method." *Montana Annotated Code § 45-2-101(65)* defines "purposely" in relevant part: [A] person acts purposely with respect to a result or to conduct described by a statute defining an offense if it is the person's conscious object to engage in that conduct or to cause that result. When a particular purpose is an element of an offense, the element is established although the purpose is conditional, unless the condition negatives the harm or evil sought to be prevented by the law defining the offense. *Montana Annotated Code § 45-2-101(35)* defines "knowingly" as: [A] person acts knowingly with respect to conduct or to a circumstance described by a statute defining an offense when the person is aware of the person's own conduct or that the circumstance exists. A person acts knowingly with respect to the result of conduct described by a statute defining an offense when the person is aware that it is highly probable that the result will be caused by the person's conduct. When knowledge of the existence of a particular fact is an element of an offense, knowledge is established if a person is aware of a high probability of its existence. "Substantial emotional distress" means extreme pain, either of body or mind, and is synonymous with agony, distress, or torment. "Harass" means to annoy repeatedly. Intimidate means "to make timid; to frighten." There was no distress; see the published comments by Sean Boushie on Joeyisalittlekid.blogspot.com. [A true and correct copy of the over 600 published comments of Sean Boushie on Joeyisalittlekid.blogspot.com is on the Flash Drive -- Exhibit 43 in the folder named Missoula Montana Criminal Case.] Sean Boushie was never followed, never harassed, never threatened in person, by mail, or by electronic communications. Having a website for a TV show does not apply; it is a Constitutionally-protected activity. William M. Windsor simply exposed Sean Boushie as a cyberstalker and criminal on a TV show website. William M. Windsor believes that every word he wrote or recorded was true. William M. Windsor honored what he understood the terms of the TOP to be despite the fact that he has consistently stated and published that the TOP expired and was not valid. There was no order

of protection; nothing listed the pending litigation; the only "protective order" that William M. Windsor was served was the TOP. William M. Windsor has not been served with anything else, including the Bench Warrant.

127. **Montana Annotated Code § 45-5-220. Stalking -- exemption -- penalty.** (2) "This section does not apply to a constitutionally protected activity." Free speech and freedom of the press are Constitutionally-protected activities. The TOP was void from the very start because it violates the Constitution if it says William M. Windsor had to release any website to Sean Boushie and could not "post" Sean Boushie's name "on it" or "on liv" or "on liu." [Exhibit 13:] Isn't it amazing that the Montana Supreme Court said in William M. Windsor's appeal of the denial of his petition for a temporary order of protection that the website activity was a Constitutionally-protected activity. So, the website wasn't stalking, and there was no basis to require William M. Windsor to release it or cease posting on it.

"First, we agree with the District Court that Windsor's claimed apprehension of bodily injury is not reasonable, given the geographic distance over which the alleged 'cyberstalking' was taking place and the fact that neither party knew the other personally. Second, stalking is defined as purposely or knowingly causing another person substantial emotional distress or reasonable apprehension of bodily injury or death by repeatedly (a) following the stalked person, which did not occur here, or (b) harassing, threatening, or intimidating the stalked person, in person or by mail, electronic communication, or any other action, device, or method. Section 45-5-220(1), MCA. There is no credible evidence that Boushie harassed, threatened, or intimidated Windsor. Moreover, the offense of stalking does not apply to a constitutionally protected activity, § 45-5-220(2), MCA, and, as the District Court noted, the blogging alleged here involved First Amendment 'free speech' rights with which [Windsor and Boushie] each appear familiar and in which they regularly engage." (*Windsor v. Boushie*, DA 13-0618 (Mont. 02/25/2014).)

(See also *State v. Helfrich*, 922 P.2d 1159, 277 Mont. 452 (Mont. 08/09/1996).)

128. **Montana Annotated Code § 45-8-213. Privacy in communications.** (1) "Except as provided in 69-6-104, a person commits the offense of violating privacy in communications if the person knowingly or purposely: (a) with the purpose to terrify, intimidate, threaten, harass, annoy, or offend, communicates with a person by electronic communication and uses obscene, lewd, or profane language, suggests a lewd or lascivious act, or threatens to inflict injury or physical harm to the person or property of the person. The use of obscene, lewd, or profane language or the making of a threat or lewd or lascivious suggestions is prima facie evidence of an intent to terrify, intimidate, threaten, harass, annoy, or offend. (b) uses an electronic communication to attempt to extort money or any other thing of value from a person or to

disturb by repeated communications the peace, quiet, or right of privacy of a person at the place where the communications are received; (c) records or causes to be recorded a conversation by use of a hidden electronic or mechanical device that reproduces a human conversation without the knowledge of all parties to the conversation. (4) "Electronic communication" means any transfer between persons of signs, signals, writing, images, sounds, data, or intelligence of any nature transmitted in whole or in part by a wire, radio, electromagnetic, photoelectronic, or photo-optical system." None of this was done by William M. Windsor, but a massive amount was done by Sean Boushie. William M. Windsor sent Sean Boushie two emails in three years other than 24 cease and desist notices for him to cease the unwanted communications. Neither of those emails violated privacy in communications, though at least 24 of Sean Boushie's definitely did.

"...a person commits the offense of violating privacy in communications if that person 'with the purpose to terrify, intimidate, threaten, harass, annoy, or offend, communicates with a person by telephone and . . . threatens to inflict injury or physical harm to the person or property of the person.'" Section 45-8-213(1)(a), MCA (1999) (emphasis added). (*State v. Flowers*, 320 Mont. 49, 86 P.3d 3, 2004 MT 37 (Mont. 02/24/2004).)

129. **Montana Annotated Code § 40-15-301 (4)** "An action brought under this chapter may be filed in the county where the petitioner currently or temporarily resides, the county where the respondent resides, or the county where the abuse occurred." The Temporary Order of Protection was void because Sean Boushie did not reside in Missoula County, and William M. Windsor did not reside in Missoula County. This is proven by Sean Boushie's PTO where he states he is a resident of Ravalli County and on the eighth page of the TOP where Sean Boushie swore that William M. Windsor was a legal resident of either Marietta Georgia or Box Elder South Dakota. All of William M. Windsor's filings with Montana courts in August 2013 showed that he was a resident of Box Elder, South Dakota. [A true and correct copy of the evidence of this is on the Flash Drive in folders named SB-13-24-2, DA-13-0540, DR-13-144-2, and DV-13-899.] The lies that Sean Boushie told about alleged abuse were in Ravalli County. William M. Windsor's filming on the campus of the University of Montana with authorization from the Montana Film Commission, the City of Missoula, and the University of Montana cannot be considered improper in any way, shape, form, or manner. He was there with the full knowledge of the University of Montana Police, as has been well-documented. On August 21, 2013, the day Sean Boushie filed his application for a protective

order, William M. Windsor filed a University of Montana Police report against Sean Boushie for stalking. Sean Boushie did not file anything, and Officer Nick Painter of the University of Montana Police advised William M. Windsor that he spoke with Sean Boushie and told him to stay away from William M. Windsor and cease sending him emails or messages. [Exhibit 2013-08-21-11-13-00-AM-University-of-Montana-Police-Report in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of the police report notice of filing.] [A true and correct copy of the videos filmed while William M. Windsor was on the University of Montana campus on August 21, 2013 are on <http://www.youtube.com/lawlessamerica>, and are referenced and incorporated herein as if attached hereto.] This was filming an expose story. There was no stalking.

130. **Montana Annotated Code § 40-15-301 (6)** "An order of protection issued under this section is effective throughout the state. Courts and law enforcement officials shall give full faith and credit to all orders of protection issued within the state." William M. Windsor did nothing to violate anything in Montana. He left Missoula the day after he was served with the Temporary Order of Protection, filmed one day in Great Falls, Montana, and left the state the morning of August 26, 2013. He has never returned and hopes to never return. There is no allegation that William M. Windsor committed any violation of any protective order anywhere in the State of Montana. Anything that William M. Windsor did in Texas, where he was from August 31, 2013 to December 29, 2014 is not restricted by any order of protection.

131. **Montana Annotated Code § 40-15-301 (7)** provides: "A certified copy of an order of protection from another state, along with proof of service, may be filed in a Montana court with jurisdiction over orders of protection in the county where the petitioner resides. If properly filed in Montana, an order of protection issued in another state must be enforced in the same manner as an order of protection issued in Montana." **Texas Family Code § 88.005** requires registration of a foreign protective order for it to be valid in Texas. There has been no such registration in Texas. In fact, Sean Boushie attempted to get it recognized in Texas, but the judge failed to do so. William M. Windsor did not do anything he is accused of in Montana. William M. Windsor has been in Texas where a protective order from Montana has no validity.

132. **Montana Annotated Code § 46-9-201. Who may admit to bail.** “A judge may admit to bail any defendant properly appearing before the judge in a bail proceeding. When bound over to any court or judge having jurisdiction of the offense charged, bail must be continued provided that the court or judge having jurisdiction may increase, reduce, or substitute bail. On appeal, a judge before whom the trial was had or a judge having the power to issue a writ of habeas corpus may admit the defendant to bail. For purposes of this section, a defendant's appearance before a judge may be either by physical appearance before the court or by two-way electronic audio-video communication as provided in 46-9-206.” William M. Windsor never appeared before Judge Karen Townsend, yet the Bench Warrant alleges that bail was set. This violates this law. [Exhibit 1 in the folder on the Flash Drive named Missoula Montana Criminal Charges.]

133. **Montana Annotated Code § 46-9-206. Setting bail -- appearance or use of two-way electronic audio-video communication.** “The requirement that a defendant be taken before a judge for setting of bail may, in the discretion of the court, be satisfied either by the defendant's physical appearance before the court or by two-way electronic audio-video communication. The audio-video communication must operate so that the defendant and the judge can see each other simultaneously and converse with each other, so that the defendant and the defendant's counsel, if any, can communicate privately, and so that the defendant and the defendant's counsel are both physically present in the same place during the two-way electronic audio-video communication. The defendant may waive the requirement that the defendant's counsel be in the defendant's physical presence during the two-way electronic audio-video communication. A judge may order a defendant's physical appearance in court for the hearing of an application for admission to bail.” William M. Windsor never appeared before Judge Karen Townsend in any manner.

134. **Montana Annotated Code § 45-7-202. False swearing.** “(1) A person commits the offense of false swearing if the person knowingly makes a false statement under oath or equivalent affirmation or swears or affirms the truth of a statement previously made when the person does not believe the statement to be true and: (a) the falsification occurs in an official proceeding; (b) the falsification is purposely made to mislead a public servant in performing an official function; or (c) the statement is one that is required by law to be sworn or affirmed before a notary or other person authorized to administer oaths.” Sean Boushie

knowingly attested falsely and provided incorrect information in his Application for Temporary Order of Protection. Exhibit 13 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of what Sean Boushie swore to. Exhibit A hereto is a true and correct copy of the AFFIDAVIT of William M. Windsor dated January 15, 2015 identifying each of the false statements. William M. Windsor's statements have not been controverted in any manner. Sean Boushie's perjury has been well documented above.

135. **Montana Annotated Code § 45-7-201. Perjury.** "(1) A person commits the offense of perjury if in any official proceeding he knowingly makes a false statement under oath or equivalent affirmation or swears or affirms the truth of a statement previously made, when the statement is material." Sean Boushie is guilty of many counts of perjury. William M. Windsor has provided both sworn testimony and evidence to prove significant perjury.

THE TEMPORARY ORDER OF PROTECTION IS A VOID ORDER.

136. The TOP is a **void order**. The U.S. Supreme Court has stated that if a court is "without authority, its judgments and orders are regarded as nullities. They are not voidable, but simply void; and form no bar to a recovery sought, even prior to a reversal in opposition to them. They constitute no justification; and all persons concerned in executing such judgments or sentences, are considered, in law, as trespassers." (*Elliot v. Piersol*, 1 Pet. 328, 340, 26 U.S. 328, 340 (1828).)

137. It is clear and well established law that a judge must first determine whether the judge has jurisdiction before hearing and ruling in any case. Judge Sam Brown and Judge John W. Larson of Missoula Montana failed to do so, and the TOP is void.

(*Adams v. State*, No. 1:07-cv-2924-WSD-CCH (N.D.Ga. 03/05/2008).) (*See Steel Co. v. Citizens for a Better Env't*, 523 U.S. 83, 94 (1998); see also *University of S. Ala. v. The Am. Tobacco Co.*, 168 F.3d 405, 410 (11th Cir. 1999) ("[O]nce a federal court determines that it is without subject matter jurisdiction, the court is powerless to continue."). (*Jean Dean v. Wells Fargo Home Mortgage*, No. 2:10-cv-564-FtM-29SPC (M.D.Fla. 04/21/2011).) (*Taylor v. Appleton*, 30 F.3d 1365, 1366 (11th Cir. 1994).)

138. Failure to follow the mandatory requirements of the law means Judge Sam Brown and Judge John W. Larson of the Fourth Judicial District Court in Missoula Montana did not have jurisdiction.

"When there is no jurisdiction, there can be no discretion, for discretion is incident to jurisdiction." *Piper v. Pearson*, 2 Gray 120, cited in *Bradley v. Fisher*, 13 Wall 335, 20 L. Ed. 646 (1872).

Rankin v. Howard (1980) 633 F.2d 844, cert den. *Zeller v. Rankin*, 101 S.Ct. 2020, 451 U.S. 939, 68 L.Ed 2d 326. When a judge knows that he lacks jurisdiction, or acts face of clearly statutes valid statutes expressly depriving him of jurisdiction, judicial immunity is lost.

139. The TOP could be interpreted to say that William M. Windsor may not contact any member of the "U of M" staff (page 1). While the term is not even defined, a TOP may not be issued for anyone who is not a family member. Clearly the staff of the University of Mississippi, the University of Missouri, the University of Maryland, the University of Miami, the University of Memphis, the University of Minnesota, the University of Maryland, the University of Massachusetts, the University of Montreal, the University of Manitoba, the University of Montana, or any other university would not be the family of the PETITIONER.

140. *Montana Code 40-15-102* clearly provides that a TOP may only be issued to the applicant or a family member. *Montana's Petition for Temporary Order of Protection and Request for Hearing- AGO Form OVS 3* provides that those sought to be covered by a TOP must be identified, and Sean Boushie's petition did not specify anyone but his wife and himself (Exhibit 13 on the Flash Drive in the folder named Missoula Montana Criminal case, Page 1).

141. When William M. Windsor came to the Missoula Municipal Court to file his first petition for a temporary order of protection against Sean Boushie, the Clerk of the Municipal Court told William M. Windsor that he could not include anyone but an immediate family member and that they must consent to the request.

142. The *Fifth Amendment of the U.S. Constitution* provides: "No person shall be...deprived of life, liberty, or property, without due process of law...." Article 17 of the *Montana Constitution* provides: "No person shall be deprived of life, liberty, or property except by due process of law." All of these rights have been violated. Missoula County Montana Judge John W. Larson issued an injunction denying property and liberty interests without giving Windsor the opportunity to be heard at a hearing. Procedural due process requires notice and an opportunity to be heard before any governmental deprivation of a property or liberty interest.

Procedural due process requires notice and the opportunity to be heard. See *State v. Kingery* (1989), 239 Mont. 160, 166, 779 P.2d 495, 499. *State v. Sol*, 282 Mont. 69, 936 P.2d 307 (Mont. 03/20/1997).)

Procedural due process requires that parties be given reasonable notice and a reasonable opportunity to be heard; these due process requirements are reflected in MAPA in §§ 2-4-601, and 2-4-612(1), MCA. Section 2-4-612(1), MCA, provides that "[o]pportunity shall be afforded all parties to respond and present evidence and argument on all issues involved." (*Anaconda Public Schools v. James D. Whealon*, 268 P.3d 1258, 363 Mont. 344 (Mont. 01/24/2012).)

143. Meaningful access to the courts is a Constitutional right that has been denied by Judge Sam Brown and Missoula County Montana Judge John W. Larson, and this alleged order denies significant rights.

(See *Procup v. Strickland*, 792 F.2d 1069, 1072 (11th Cir. 1986) (per curiam) (en banc); *Christopher v. Harbury*, 536 U.S. 403, 415 & n.12, 122 S.Ct. 2179, 2187 & n.12, 153 L.Ed.2d 413 (2002).)

144. Every judge or government attorney takes an oath to support the U.S. Constitution. Whenever any judge violates the Constitution in the course of performing his/her duties, as Missoula County Montana Judge Karen Townsend has, then he has defrauded not only William M. Windsor, but has also the government. Judge Sam Brown, Judge John W. Larson, and Judge Karen Townsend paid to support the U.S. Constitution and the Montana Constitution. By not supporting the Constitutions, Judge Sam Brown, Judge John W. Larson, and Judge Karen Townsend are collecting monies for work not performed.

145. William M. Windsor contends that the alleged order issued by Judge Sam Brown is absolutely void. U.S. Constitutional rights take absolute precedence over any laws or actions by state judges. As a result, William M. Windsor is under no obligation to do anything in regard to the alleged TOP order.

The TOP is unintelligible

146. William M. Windsor filed a Motion for Modification of Temporary Order of Protection on August 26, 2013, three days after he was served with the TOP. This MOTION provided eight reasons why the TOP had to be modified, including the fact that it was unintelligible. [A true and correct copy of the MOTION FOR MODIFICATION OF TEMPORARY ORDER OF PROTECTION is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case.] The courts never responded to this.

147. William M. Windsor cannot understand what the TOP provides. The possible interpretations would include gross violations of the United States and Montana Constitutions and the law.

148. The terms "U of M," "staff," "post," and "on it" or "on liv" or "on liu" were not defined in the TOP and could have many meanings.

149. Does "U of M" mean University of Mississippi? There are dozens of U of M's. Is William M. Windsor denied access to any university in the world that has an M as its name?

150. Does staff mean subordinates of Sean Boushie, superiors of Sean Boushie, law enforcement, management? Does staff mean cafeteria workers? Bookstore workers? Maintenance personnel? Where in the Montana statutes does it indicate that a person like Sean Boushie is authorized by law to seek a protective order for people other than himself and perhaps his family? The law and the protective order forms provided on the Missoula County Montana Clerk's website do not permit a petitioner to seek protection for others. How can a Missoula County Montana Judge deny William M. Windsor the ability to file criminal complaints with the University of Montana Police and follow up in the half dozen or so criminal complaints that he has filed against Sean Boushie? How can a Missoula County Montana Judge deny William M. Windsor the ability to communicate with the University's attorney and management about the litigation and criminal charges that William M. Windsor is filing against the University, its President Royce Engstrom, and others? How can a Missoula County Montana Judge deny Windsor the ability to speak with employees of the University and students of the University who contact William M. Windsor with information about crimes of Sean Boushie and the University? William M. Windsor comes in contact with thousands of people in the average month. Is William M. Windsor expected to ask everyone he meets if they are on the "U of M staff?"

151. Does post mean a strong piece of timber, metal, or the like, set upright as a support, a point of attachment, a place for displaying notices; a pole on a racetrack indicating the point where a race begins or ends; to affix (a notice, bulletin, etc.) to a post, wall, or the like; to bring to public notice by or as by a poster or bill; to denounce by a public notice or declaration; to publish the name of in a list; to send a message to a newsgroup; to place text on a Web site? Is William M. Windsor not allowed to speak or write the name "Sean Boushie?" What law gives a Missoula County Montana Judge the jurisdiction to say whether anyone may speak or write the name of another? Is there case law to support such an outrageous concept?

22 14. ~~The Court deems that the following additional relief is necessary to provide for the safety and welfare of~~
 23 the Petitioner or other individuals designated in this Petition. *Release of www.seanboushie.co*
 24 *To petitioner, Respondent shall not post*
 25 *Petitioner's name on tv*

152. In paragraph 14 of the order, what does “on lit” mean? Or is it “on it” or “on liu” or “on liv?” Or is it a misspelling of online? If online, does online mean anything on the Internet anywhere? Does online mean by telephone, fax, wire, radio, TV, modem? Does online mean on Facebook? Does online mean in search engines? How is William M. Windsor supposed to control the Internet and search engines over which he has no control whatsoever? William M. Windsor doesn’t own www.seanboushie.co. How can he release something that he doesn’t own? If “online,” does online mean on William M. Windsor’s TV show website, www.SeanBoushie.com? If “online,” does online mean that William M. Windsor is no longer allowed to post the videos for his movie and TV show on YouTube? Does this mean that Missoula County Montana Judge Sam Brown has ripped away William M. Windsor’s property right to his TV show and online advertising, promotion, and distribution without due process?

contemplated by § 40-15-201(2)(j), MCA. Finally, the condition requiring Windsor to transfer SeanBoushie.com into Boushie’s name and to refrain from posting about Boushie on the site is also permissible within § 40-15-201(2)(j), MCA, under the circumstances. The

153. On June 10, 2014, the Montana Supreme Court said the TOP prohibited William M. Windsor from posting on www.SeanBoushie.com, and he has not. But, the Montana Supreme Court previously ruled in *Windsor v. Boushie* that blogging is not stalking and cannot be denied by any order of protection, so clearly the TOP is not meant to stop William M. Windsor from publishing.

“...the offense of stalking does not apply to a constitutionally protected activity, § 45-5-220(2), MCA, and, as the District Court noted, the blogging alleged here involved First Amendment ‘free speech’ rights with which [Windsor and Boushie] each appear familiar and in which they regularly engage.” (*Windsor v. Boushie*, DA 13-0618 (Mont. 02/25/2014).)

B. WILLIAM M. WINDSOR’S CONSTITUTIONAL RIGHTS HAVE BEEN VIOLATED.

154. The TOP and these criminal charges are an absolute outrage.

155. The TOP violates William M. Windsor's Constitutional rights. William M. Windsor expressed this to Missoula County Montana Judge John W. Larson in his MOTION FOR MODIFICATION OF PETITION FOR PROTECTIVE ORDER, on the Flash Drive in the folder named DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-3 ¶¶ 44 TO 52.]



156. William M. Windsor is a journalist who was in Missoula filming a television show that is an expose about Sean Boushie and the University of Montana. William M. Windsor's work was unlawfully interrupted by the TOP. William M. Windsor was served with the TOP at the start of filming on the campus of the University of Montana and was escorted off the property. This is a violation of William M. Windsor's *First Amendment* rights of Freedom of the Press, and it wrongfully interferes with William M. Windsor's business and profession. William M. Windsor is unable to complete the work that he has done in Missoula by being denied the ability to be on campus.

157. Prior to coming to Montana, William M. Windsor filed for a film permit with the State of Montana Film Commission and obtained permission for filming in the state. William M. Windsor made the necessary arrangements with both the City of Missoula and the University of Montana, which allows William M. Windsor to film on any public property in the City of Missoula and anywhere on the campus of the University of Montana except near medical facilities where patients might be seen.

158. The TOP violates the *First and Fourteenth Amendment* rights to free speech and freedom of the press and violated the Montana Constitution. The *Fourteenth Amendment* proscribed the various states from abridging freedom of speech and press as mandated by the First Amendment. Montana also has a strong freedom of speech clause in the *Montana Constitution*, Art. I, Sec. 7. It provides: "Section 7.

FREEDOM OF SPEECH, EXPRESSION, AND PRESS. No law shall be passed impairing the freedom of speech or expression. Every person shall be free to speak or publish whatever he will on any subject, being responsible for all abuse of that liberty. [emphasis added.]

159. The TOP seems to limit the ability for William M. Windsor to publish the name "Sean Boushie." The TOP denies William M. Windsor access to the campus of the University of Montana, where it is essential that William M. Windsor continue to film, conduct research, and interview. But, the Montana Supreme Court has already ruled in *Windsor v. Boushie* that blogging cannot be denied by any order of protection, so clearly the TOP is unconstitutional.

"...the offense of stalking does not apply to a constitutionally protected activity, § 45-5-220(2), MCA, and, as the District Court noted, the blogging alleged here involved First Amendment 'free speech' rights with which [Windsor and Boushie] each appear familiar and in which they regularly engage." (*Windsor v. Boushie*, DA 13-0618 (Mont. 02/25/2014).)

160. The underlying philosophy of the broad latitude attached to the *First Amendment's* guarantee of freedom of the press found eloquent expression in the words of John Marshall, which were quoted with approval by James Madison, *6 Writings of James Madison* 1790-1802, p. 336 (G. Hunt ed. 1906):

"Among those principles deemed sacred in America, among those sacred rights considered as forming the bulwark of their liberty, which the Government contemplates with awful reverence and would approach only with the most cautious circumspection, there is no one of which the importance is more deeply impressed on the public mind than the liberty of the press. That this liberty is often carried to excess; that it has sometimes degenerated into licentiousness, is seen and lamented, but the remedy has not yet been discovered. Perhaps it is an evil inseparable from the good with which it is allied; perhaps it is a shoot which cannot be stripped from the stalk without wounding vitally the plant from which it is torn. However desirable those measures might be which might correct without enslaving the press, they have never yet been devised in America."

Chief Justice Hughes in *DeJonge v. Oregon*, 299 U.S. 353, 365, 57 S. Ct. 255, 260 (1937) tersely stated the underlying philosophy inherent in the First Amendment's guarantee of freedom of speech and press in the following words: "(Imperative) is the need to preserve inviolate the constitutional rights of free speech, free press and free assembly in order to maintain the opportunity for free political Discussion, to the end that government may be responsive to the will of the people and that changes, if desired, may be obtained by peaceful means. Therein lies the security of the Republic, the very foundation of constitutional government."

The news media itself bears the greater responsibility, even more than the courts, to preserve the *First Amendment's* guarantee of freedom of speech and press. Self discipline on the part of the news media, and it alone, can give purity of meaning to the *First Amendment* and justification for its literal interpretation and application. (*Elmer E. Whitmore v. Kansas City Star*, 499 S.W.2d 45, 07/23/73.)

161. The Missoula County Montana Fourth Judicial District Court has been operating in violation of the Constitution with the TOP. This violates the oath of office of both Missoula County Montana Judge John W. Larson and Judge Karen Townsend, so the TOP order as written is void and unenforceable.

162. It has been said that most jurists, along with most U.S. citizens, agree with Justice Oliver Wendell Holmes, Jr., who felt that the Constitution allows some restrictions on speech under certain circumstances. To illustrate this point, Holmes wrote, "The most stringent protection of free speech would not protect a man in falsely shouting fire in a theater and causing a panic" (*Schenck v. United States*, 249 U.S. 47, 39 S. Ct. 247, 63 L. Ed. 470 [1919]). Oliver Wendell Holmes must be turning over in his grave at the thought that today in Montana, denying the publishing of a man's name, sending an email, and sending a Tweet have been found to be acceptable in spite of the First Amendment. Oliver Wendell Holmes wouldn't even need an explanation of what an email and a Tweet are.

163. The effect of this TOP is to say that the media may no longer function in the United States involving a resident of Montana, or someone who commits stalking while in Montana, because any news story that is pursued by the media may be considered stalking. The TOP is a prior restraint on speech, and that is not allowed.

If the government tries to restrain speech before it is spoken, as opposed to punishing it afterwards, it must be able to show that punishment after the fact is not a sufficient remedy, and show that allowing the speech would "surely result in direct, immediate, and irreparable damage to our Nation and its people" (*New York Times Co. v. United States*). U.S. courts have not permitted most prior restraints since the case of *Near v. Minnesota* in 1931.

164. **Constitution of the State of Montana Article 2 Declaration of Rights § 3. Inalienable rights.** "All persons are born free and have certain inalienable rights. They include the right to a clean and healthful environment and the rights of pursuing life's basic necessities, enjoying and defending their lives and liberties, acquiring, possessing and protecting property, and seeking their safety, health and happiness in all lawful ways. In enjoying these rights, all persons recognize corresponding responsibilities." William M. Windsor has been denied these inalienable rights. He is being denied liberty, and he is being denied possession and protection of his property. William M. Windsor was detained in an Ellis County Texas Jail on completely bogus charges and an illegal Bench Warrant from Judge Karen Townsend of Missoula,

Montana. And various judges in Montana say that William M. Windsor needs to give his TV show website to a Montana criminal; that website is personal property, and no judge has a right to take any property without due process, and there has been none. Judge Sam Brown, Judge John W. Larson, the Montana Supreme Court, Judge Karen Townsend, Missoula County Attorney's Office legal Intern Tyler Dugger, and Assistant Missoula County Montana Attorney Jennifer Clark have all violated their oaths of office and the Montana Constitution by denying these inalienable rights.

165. Constitution of the State of Montana Article 2 Declaration of Rights § 7. Freedom of speech, expression, and press. "No law shall be passed impairing the freedom of speech or expression. Every person shall be free to speak or publish whatever he will on any subject, being responsible for all abuse of that liberty. In all suits and prosecutions for libel or slander the truth thereof may be given in evidence; and the jury, under the direction of the court, shall determine the law and the facts." William M. Windsor has the absolute right to speak and publish whatever he chooses as long as he does not commit libel or slander, and he hasn't. If Sean Boushie wants to attempt to claim that William M. Windsor has libeled or slandered him, his sole recourse is a civil suit. Sean Boushie has not filed a civil suit because he would have no case, and he would have to testify under oath. This would create hundreds of counts of perjury or result in his admission that he had lied repeatedly. Law enforcement and the courts in Montana, and the Missoula County Attorney's Office all want to say that William M. Windsor has no right to say anything about a stalker and a criminal. This is as serious a violation of fundamental Constitutional rights as it gets. And they aren't doing it because they don't have the sense to read and understand the Constitutions, they are doing it because they can do whatever they want in Montana, and because the corruption goes all the way to the Montana Supreme Court, William M. Windsor and other victims have no recourse. The United States Supreme Court (corrupt as they are) is not an answer; they only review 1 out of 100 cases that are appealed. The chances of the U.S. Supreme Court reviewing William M. Windsor's legal rape by the State of Montana are about as good as 20-year-old Palma de Mallorca's chances were when the Spanish judiciary sentenced him to 384,912 years for having failed to deliver letters. Judge Sam Brown, Judge John W. Larson, the Montana Supreme Court, Judge Karen Townsend, Missoula County Attorney's Office legal Intern Tyler

Dugger, and Assistant Missoula County Montana Attorney Jennifer Clark have all violated their oaths of office and the Montana Constitution by denying these rights. The Montana Supreme Court has already ruled in *Windsor v. Boushie* that blogging cannot be denied by any order of protection, so clearly the TOP is unconstitutional.

“...the offense of stalking does not apply to a constitutionally protected activity, § 45-5-220(2), MCA, and, as the District Court noted, the blogging alleged here involved First Amendment ‘free speech’ rights with which [Windsor and Boushie] each appear familiar and in which they regularly engage.” (*Windsor v. Boushie*, DA 13-0618 (Mont. 02/25/2014).)

The First Amendment to the United States Constitution and Article II, Section 7 of the Montana Constitution both protect the right to free speech. The First Amendment to the United States Constitution provides that “Congress shall make no law abridging the freedom of speech.” Montana is bound to the guarantees of the First Amendment by the Due Process Clause of the Fourteenth Amendment. *City of Whitefish v. O’Shaughnessy*, 216 Mont. 433, 438, 704 P.2d 1021, 1024 (1985) (citing *Gillow v. New York*, 268 U.S. 652, 45 S.Ct. 625, 69 L.Ed. 1138 (1925)). Article II, Section 7 of the Montana Constitution states that “[n]o law shall be passed impairing the freedom of speech or expression.” Additionally, under Article II, Section 7, “[e]very person shall be free to speak . . . whatever he will on any subject, being responsible for all abuse of that liberty.”

The right to free speech is a fundamental personal right and “essential to the common quest for truth and the vitality of society as a whole.” *St. James Healthcare v. Cole*, 2008 MT 44, ¶ 26, 341 Mont. 368, 178 P.3d 696 (quoting *Bose Corp. v. Consumers Union*, 466 U.S. 485, 503–04, 104 S.Ct. 1949, 1961, 80 L.Ed.2d 502 (1984)). The “vast majority” of speech enjoys constitutional protection. *State v. Lance*, 222 Mont. 92, 102, 721 P.2d 1258, 1265 (1986).

166. Constitution of the State of Montana Article 2 Declaration of Rights § 12. Right to bear arms. “The right of any person to keep or bear arms in defense of his own home, person, and property, or in aid of the civil power when thereto legally summoned, shall not be called in question, but nothing herein contained shall be held to permit the carrying of concealed weapons.” William M. Windsor has the absolute right to own and possess a gun, especially in light of the death threats that he has received from Sean Boushie and others and his attempted murder by Sean Boushie. William M. Windsor swore under penalty of perjury that he never had a gun in Montana, and the courts ignored it. Tyler Dugger and Assistant County Attorney Jennifer Clark ignored it and all of William M. Windsor’s sworn affidavits in the underlying case. Judge Karen Townsend’s order says William M. Windsor may not possess a gun, yet Judge Karen Townsend has no basis whatsoever to deny that right in light of the clear evidence that William M. Windsor has provided. William M. Windsor has never shot anything but a target in his life, but he is a target, and he needs to have a gun so he can defend himself against anyone who tries to harm him. Sean Boushie, Judge Sam Brown,

Judge John W. Larson, the Montana Supreme Court, Judge Karen Townsend, Missoula County Attorney's Office legal Intern Tyler Dugger, and Assistant Missoula County Montana Attorney Jennifer Clark have all violated their oaths of office and the Montana Constitution by denying this right.

167. Constitution of the State of Montana Article 2 Declaration of Rights § 16. The administration of justice. "Courts of justice shall be open to every person, and speedy remedy afforded for every injury of person, property, or character." William M. Windsor came to the Montana courts with absolutely undeniable evidence of hundreds of crimes of stalking and other offenses by Sean Boushie, and he was improperly denied a remedy for his injuries. One judge, Justice of the Peace Jim Bailey assaulted him twice by throwing his petition for a temporary restraining order in his face. Another judge, Judge Kathleen Jenks of Missoula Montana did not even issue an order denying William M. Windsor's petition for a temporary restraining order. Judge James A. Haynes and Judge John W. Larson demonstrated significant corruption when they violated one law after another. Then they allowed bogus charges to be manufactured against William M. Windsor in a case of corrupt administration of justice. Judge Sam Brown, Justice of the Peace Jim Bailey, Judge James A. Haynes, Judge Kathleen Jenks, Judge John W. Larson, the Montana Supreme Court, Judge Karen Townsend, have all violated their oaths of office and the Montana Constitution by improperly administering "justice" and denying this right. [A true and correct copy of the petitions for protective order that William M. Windsor filed in Ravalli County are on the Flash Drive -- Exhibit 45 in the folder named Missoula Montana Criminal Case.] [A true and correct copy of the petitions for protective order that William M. Windsor filed in Missoula County are on the Flash Drive -- Exhibit 46 in the folder named Missoula Montana Criminal Case.]

168. Constitution of the State of Montana Article 2 Declaration of Rights § 17. Due process of law. "No person shall be deprived of life, liberty, or property without due process of law." William M. Windsor's liberty has been denied by Judge Karen Townsend through the issuance of an illegal Bench Warrant and then telling the authorities in Ellis County Texas that William M. Windsor was not to be released on bond as the law provided. Taking William M. Windsor's website in absolute violation of the law and without giving William M. Windsor notice or the opportunity to be heard violates fundamental due

process. William M. Windsor's property is being denied without due process of law by Judge Sam Brown, Judge John W. Larson, the Montana Supreme Court, Judge Karen Townsend, Missoula County Attorney's Office legal Intern Tyler Dugger, and Assistant Missoula County Montana Attorney Jennifer Clark; each has violated their oaths of office and the Montana Constitution by denying due process and this Constitutional right.

169. Constitution of the State of Montana Article 2 Declaration of Rights § 21. Bail. "All persons shall be bailable by sufficient sureties, except for capital offenses, when the proof is evident or the presumption great." William M. Windsor was denied bail in Texas because Judge Karen Townsend and/or Judge John W. Larson and/or Missoula County Attorney's Office legal Intern Tyler Dugger, and Assistant Missoula County Montana Attorney Jennifer Clark told the Ellis County Texas authorities that William M. Windsor was not to be released on either of the two bonds that he provided. Judge Karen Townsend and/or Judge John W. Larson and/or Missoula County Attorney's Office legal Intern Tyler Dugger, and Assistant Missoula County Montana Attorney Jennifer Clark are guilty of violating William M. Windsor's right to bail, and they violated their oaths of office and the Montana Constitution by denying due process and this Constitutional right.

170. Constitution of the State of Montana Article 2 Declaration of Rights § 22. Excessive sanctions. "Excessive bail shall not be required, or excessive fines imposed, or cruel and unusual punishments inflicted." Judge Karen Townsend claims that \$100,000 bail is required. Excessive is not the right word. Totally outrageous is more appropriate. William M. Windsor had never been charged with a crime in his life; had never been in jail; was not subject to any protective order (no protective order was even presented to Judge Karen Townsend for consideration); had filed extensive proof that he was the victim not Sean Boushie; had committed absolutely no crimes in this case; hasn't even had a traffic ticket or parking ticket in 15 years; was then denied bail; was strip-searched, sprayed with de-licing spray, denied a telephone call, denied socks, denied a toothbrush, denied access to a law library; was exposed to Staph, MRSA, Herpes, Tuberculosis, Lord knows what all else, and some very insane people; was denied his liberty wrongfully for 53 days during which time his personal property was held for "evidence for Montana" as his computer and

zip drive were undoubtedly copied; and was denied every form of Constitutional right while he was illegally detained, illegally incarcerated, illegally denied bond, and illegally denied discharge. This has been excessive and cruel and unusual. Judge Karen Townsend violated her oath of office and the Montana Constitution by ordering an excessive bail. Judge Karen Townsend violated this Constitutional right.

171. Constitution of the State of Montana Article 2 Declaration of Rights § 24. Rights of the accused. In all criminal prosecutions the accused shall have the right to appear and defend in person and by counsel; to demand the nature and cause of the accusation; to meet the witnesses against him face to face; to have process to compel the attendance of witnesses in his behalf, and a speedy public trial by an impartial jury of the county or district in which the offense is alleged to have been committed, subject to the right of the state to have a change of venue for any of the causes for which the defendant may obtain the same.” William M. Windsor demanded the nature of the accusations from Missoula County Attorney Jennifer Clark, and she refused to provide the information. Missoula County Attorney Jennifer Clark violated her oath of office and the Montana Constitution by denying this right.

172. Constitution of the State of Montana Article 2 Declaration of Rights § 34. Unenumerated rights. The enumeration in this constitution of certain rights shall not be construed to deny, impair, or disparage others retained by the people. William M. Windsor is the victim of rampant corruption in the State of Montana. William M. Windsor has the right to have honest people in law enforcement, the courts, and the county attorney’s office, and there do not appear to be any. Honesty of government officials and a system that is free from corruption are unenumerated rights that are perhaps more important than all of these other rights Judge Sam Brown, Justice of the Peace Jim Bailey, Judge James A. Haynes, Judge Kathleen Jenks, Judge John W. Larson, the Montana Supreme Court, Judge Karen Townsend, the Missoula County Attorney’s Office, Fred Van Valkenburg, Missoula County Attorney’s Office legal Intern Tyler Dugger, and Assistant Missoula County Montana Attorney Jennifer Clark, the Missoula Police Department, the University of Montana Police Department, attorney Claudia Denker-Eccles, Sean Boushie and his attorneys, have violated their oaths of office and/or the Montana Constitution by being dishonest and/or corrupt.

173. **Constitution of the United States First Amendment** “Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.” This has been discussed above. This is the fundamental problem with these utterly ridiculous charges.

174. **Constitution of the United States Second Amendment** “A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed.” This has been discussed above.

175. **Constitution of the United States Fifth Amendment** “No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the Militia, when in actual service in time of War or public danger; nor shall any person be subject for the same offence to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.” An “infamous crime” is defined as one that is “punishable by death in the state penitentiary or imprisonment in a state correctional facility.” (*Farrakhan v. Gregoire*, 2010 U.S. App. LEXIS 141 (9th Cir. Wash. Jan. 5, 2010).) There is no indictment in this case, but the penalty has been clearly identified by the Missoula County Attorney as imprisonment in the Montana State Prison, and that is an “infamous crime.” William M. Windsor may not be held to answer to the charges listed on the Bench Warrant. William M. Windsor’s property (website) has been alleged to have been taken, but there has been no due process whatsoever. No court has the authority to violate the United States Constitution and take away William M. Windsor’s property. Besides, the First Amendment of the U.S. Constitution and Constitution of the State of Montana Article 2 Declaration of Rights Section 7 grant William M. Windsor the undeniable right of free speech and freedom of the press. Judge Sam Brown, Justice of the Peace Jim Bailey, Judge James A. Haynes, Judge Kathleen Jenks, Judge John W. Larson, the Montana Supreme Court, Judge Karen Townsend, the Missoula County Attorney’s Office, Fred Van Valkenburg, Missoula County Attorney’s Office legal

Intern Tyler Dugger, and Assistant Missoula County Montana Attorney Jennifer Clark, the Missoula Police Department, the University of Montana Police Department, attorney Claudia Denker-Eccles, Sean Boushie and his attorneys, Ellis County Texas Sheriff Johnny Brown, Ellis County Texas District Attorney Patrick Wilson, and Ellis County Judge Cindy Ermatinger have violated their oaths of office and/or the Constitution.

176. Constitution of the United States Fourteenth Amendment “Section 1. All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.” William M. Windsor’s property (website) has been alleged to have been taken, but there has been no due process whatsoever. No court has the authority to violate the United States Constitution and take away William M. Windsor’s property. Besides, the First Amendment of the U.S. Constitution and Constitution of the State of Montana Article 2 Declaration of Rights Section 7 grant William M. Windsor the undeniable right of free speech and freedom of the press. William M. Windsor has been denied equal protection under the law because his massive proof of stalking by Sean Boushie was ignored by the Ravalli County and Missoula County courts, yet William M. Windsor did nothing and has been subject to a Temporary Order of Protection and is now facing bogus criminal charges. Judge Sam Brown, Justice of the Peace Jim Bailey, Judge James A. Haynes, Judge Kathleen Jenks, Judge John W. Larson, the Montana Supreme Court, Judge Karen Townsend, the Missoula County Attorney’s Office, Fred Van Valkenburg, Missoula County Attorney’s Office legal Intern Tyler Dugger, and Assistant Missoula County Montana Attorney Jennifer Clark, the Missoula Police Department, the University of Montana Police Department, attorney Claudia Denker-Eccles, Sean Boushie and his attorneys, Ellis County Texas Sheriff Johnny Brown, Ellis County Texas District Attorney Patrick Wilson, and Ellis County Judge Cindy Ermatinger have violated their oaths of office and/or the Constitution.

C. JUDGE KAREN TOWNSEND VIOLATED THE LAW ON BENCH WARRANTS, AND WILLIAM M. WINDSOR WAS DETAINED IMPROPERLY AS A RESULT.

177. Judge Karen Townsend issued a Bench Warrant on felonies that require an indictment.

There is no indictment, and the Bench Warrant must be quashed. (Constitution of the United States Fifth Amendment "No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury....")

178. Montana Annotated Code § 46-6-201. Issuance of arrest warrant upon complaint. "If it appears from the contents of the complaint and the examination of the complainant and from the examination of other witnesses or affidavits, if any, that there is probable cause to believe that the person against whom the complaint was made has committed an offense, a warrant shall be issued by the court for the arrest of the person complained against." There was no probable cause. For starters, the case file shows that Missoula County Montana Judge Karen Townsend was not even shown that a protective order existed. That's because there isn't one! The so-called complaint is a short document signed by a legal intern, Tyler Dugger, and Assistant District Attorney Jennifer Clark. Neither of them have any personal knowledge of anything. The charges are totally unfounded and do not even violate the TOP that was void and expired. And, there was no examination of the complainant, in clear violation of this statute. [A true and correct copy of the case file in this case consists of Exhibits 1, 9, 10, 11, and 12 on the Flash Drive in the folder named Missoula Montana Criminal Charges.]

"Section 46-6-201, MCA, provides that an arrest warrant may be issued when a written complaint is presented to a court charging a person with the commission of an offense and the court examines the complainant under oath to determine if there is probable cause for the arrest." (*State v. Sor-lokken*, 247 Mont. 343, 805 P.2d 1367 (Mont. 02/06/1991).) [emphasis added.]

"The Rules of Professional Responsibility adopted by Missoula County Montana Judge Karen Townsend preclude prosecution which is not supported by probable cause. Rule 3.8 provides that '[t]he prosecutor in a criminal case shall: (a) refrain from prosecuting a charge that the prosecutor knows is not supported by probable cause.' 'Probable cause is . . . the concurrence of the belief of guilt with the existence of facts and circumstances reasonably warranting the belief.' *State ex rel. Wong You v. District Court* (1938), 106 Mont. 347, 353, 78 P.2d 353, 355; see also *State v. Lynn* (1990), 243 Mont. 430, 434, 795 P.2d 429, 432." (*State v. Johnson*, 918 P.2d 293, 276 Mont. 447 (Mont. 05/14/1996).)

"We conclude that the Notice to Appear and Complaint does not set forth sufficient facts which, in combination with Judge Smith's examination of Dighans, satisfy the statutory requirement that it appear 'from the contents of the [written] complaint and the examination [on oath] of the complainant and other witnesses, if any, that there is probable cause to believe that the person against whom the complaint was made has committed an offense.' See § 46-6-201, MCA (1989), the statute in effect in November 1990, when Dighans applied to file the complaint and obtain the arrest

warrant against Sacco. *In State ex rel. Wicks v. District Court of Tenth J.D.* (1972), 159 Mont. 434, 498 P.2d 1202, interpreting that same language from § 95-603, RCM 1947, we held unlawful the issuance of an arrest warrant where the complaint of the deputy prosecutor, under oath, disclosed nothing more than his 'bald conclusion' that the defendant committed the offense charged on a date certain and where neither the complainant nor justice of the peace could remember whether the complainant was examined under oath. *Wicks*, 498 P.2d at 1203-04. We stated: The showing of 'probable cause' required for issuance of a warrant of arrest is similar and analogous to the showing of 'probable cause' required for the issuance of a search warrant. [Citing *Application of Gray* (1970), 155 Mont. 510, 473 P.2d 532]. As applied to the facts of this case, such showing must disclose facts which will enable the magistrate to make a judicial determination of the existence of probable cause and undisclosed information possessed by law enforcement officers is irrelevant. *Wicks*, 498 P.2d at 1204. The complaint, here, sets forth nothing but Dighans' conclusory statement that Sacco committed the offense of theft of the photo negatives and proof sheets. There was no affidavit of probable cause or other written statement of probable cause before the city judge when the decision was made to issue an arrest warrant nor were there any underlying facts within the body of the complaint itself from which the magistrate could make a judicial determination of the existence of probable cause. Moreover, Judge Smith testified that he could not remember being provided with any more information than what appeared on the face of the complaint, and Dighans' affidavit does not disclose that he provided Judge Smith with any more information than what was on the face of the complaint. We hold that what appeared on the face of the complaint is an insufficient basis, as a matter of law, upon which to premise a finding of probable cause. *Wicks*, 498 P.2d at 1203-04. If the officer simply swears to his bald conclusions that the defendant committed the crime charged without either orally or in writing swearing to the factual basis for those conclusions, the magistrate has no legal basis on which to make the statutorily required finding of probable cause for the issuance of the warrant of arrest or summons (§ 46-6-201, MCA (1989)). We also conclude that a reasonably competent officer would have known of that legal requirement and that such an officer would have concluded that an arrest warrant could not issue." (*Sacco v. High Country Independent Press*, 896 P.2d 411, 271 Mont. 209 (Mont. 02/14/1995).) [emphasis added.]

(See also *State v. Allum*, 114 P.3d 233, 327 Mont. 363, 2005 MT 150 (Mont. 06/14/2005).)

179. **Montana Annotated Code § 46-6-211. Issuance of arrest warrant or summons.** "(1)

Upon the filing of a charge, the court may issue a summons or an arrest warrant as provided in 46-11-201. A summons may be issued to a corporation upon the filing of a charge against it. More than one warrant or summons may be issued on the same charge. (2) A summons may be served personally or by first-class mail." William M. Windsor has not been served with anything.

180. **Montana Annotated Code § 46-11-201. Leave to file information.** "(2) An application

must be by affidavit supported by evidence that the judge or chief justice may require. If it appears that there is probable cause to believe that an offense has been committed by the defendant, the judge or chief justice shall grant leave to file the information, otherwise the application is denied." Missoula County Montana Judge Karen Townsend did not require any evidence. Absolutely no evidence was presented, as is proven by

the file copy that William M. Windsor obtained from the Clerk of the Court. The so-called complaint is a short document signed by a legal intern, Tyler Dugger, and Assistant District Attorney Jennifer Clark. Neither of them have any personal knowledge of anything. The State failed to include sufficient evidence in the amended affidavit to support a finding of probable cause as required under § 46-11-201, MCA. [A true and correct copy of the case file in this case consists of Exhibits 1, 9, 10, 11, and 12 on the Flash Drive in the folder named Missoula Montana Criminal Charges.]

181. **Montana Annotated Code § 46-6-215. Execution of warrant.** "An arrest warrant may be directed to all peace officers in the state. It must be executed by a peace officer and may be executed in any county of the state. Arrest warrants issued for the violation of city ordinances may not be executed outside the city limits, except as otherwise provided by law." The Bench Warrant (Exhibit 1 in the folder on the Flash Drive named Missoula Montana Criminal Charges) clearly shows that it was for an arrest in Montana. It had no validity in any other state.

182. **Montana Annotated Code § 46-6-216. Manner of arrest with warrant.** "(1) When making an arrest pursuant to a warrant, a peace officer shall inform the person to be arrested of the officer's authority, the intention to arrest that person, the cause of the arrest, and the fact that a warrant has been issued for that person's arrest, except: (a) when the person flees or forcibly resists before the peace officer has an opportunity to inform the person; or (b) when the giving of the information will imperil the arrest. (2) The peace officer need not have possession of the warrant at the time of the arrest, but after the arrest, the warrant must be shown to the person arrested as soon as practicable if the person requests." William M. Windsor was detained for 53 days in Ellis County Texas, but he was never arrested, was never told what the charges were, and was not read his rights. The Transcript from the court hearing on December 19, 2014 in Case #14-158 in Ellis County District Court will show that Lieutenant Michael Tobey admitted that William M. Windsor was not read his rights. (P 40 Lines 18-20.) The file in that case proves that William M. Windsor was never told what the charges were. Ellis County Texas District Attorney Patrick Wilson told Ellis County Texas Judge Cindy Ermatinger that William M. Windsor committed a felony in Montana on December 30, 2013 and fled the state. This was a complete fabrication by Ellis County Texas District

Attorney Patrick Wilson, a lie that Ellis County Texas District Attorney Patrick Wilson told to block William M. Windsor's release. [A true and correct copy of the Transcript of the December 19, 2014 Hearing is on the Flash Drive -- Exhibit 39 in the folder named Missoula Montana Criminal Case.]

D. THE EXTRADITION LAWS OF BOTH MONTANA AND TEXAS WERE VIOLATED DUE TO THE BENCH WARRANT, AND WILLIAM M. WINDSOR'S RIGHTS WERE DENIED.

183. **Montana Annotated Code § 46-30-401. Application for issuance of requisition.** "(1)

When the return to this state of a person charged with a crime in this state is required, the prosecuting attorney shall present to the governor a written application for a requisition for the return of the person charged. The application must state the name of the person charged, the crime charged against the person, the approximate time, place, and circumstances of its commission, and the state in which the person is believed to be, including the location of the accused in that state at the time the application is made. The application must certify that in the opinion of the prosecuting attorney the ends of justice require the arrest and return of the accused to this state for trial and that the proceeding is not being instituted to enforce a private claim."

The Bench Warrant issued by Missoula County Montana Judge Karen Townsend was not valid anywhere but Montana. The use of it to detain William M. Windsor in Texas was illegal. If a Governor's Warrant has been issued in Texas, then and only then was there a valid warrant for William M. Windsor in Texas. There is no valid warrant in any other state except Montana and perhaps Texas, and the Bench Warrant must be quashed and at least removed from the database that might cause other law enforcement authorities to act improperly on that Montana-only warrant.

184. **Montana Annotated Code § 46-30-402. Requisition by governor.** "Whenever the governor of this state shall demand a person charged with crime or with escaping from confinement or breaking the terms of his bail, probation, or parole in this state from the chief executive of any other state or from the chief justice or an associate justice of the supreme court of the District of Columbia authorized to receive such demand under the laws of the United States, he shall issue a warrant under the seal of this state to some agent commanding him to receive the person so charged if delivered to him and convey him to the

proper officer of the county in this state in which the offense was committed.” See paragraph 183 immediately above.

185. **Montana Annotated Code § 46-30-302. Commitment to await requisition.** “If from the examination before the judge or magistrate it appears that the person held is the person charged with having committed the crime alleged and, except in cases arising under 46-30-204, that he has fled from justice, the judge or magistrate must by a warrant reciting the accusation commit him to the county jail for such a time not exceeding 30 days and specified in the warrant as will enable the arrest of the accused to be made under a warrant of the governor on a requisition of the executive authority of the state having jurisdiction of the offense, unless the accused give bail as provided in 46-30-303 or until he shall be legally discharged.” Both Montana and Texas have identical laws as both adopted the Uniform Criminal Extradition Act. Judge Karen Townsend and/or Judge John W. Larson and the Missoula County Attorney’s Office allowed Ellis County Texas to detain William M. Windsor longer than 30 days, and one or the other denied a Texas bond and a Montana bond with absolutely no legal authority to do so.

The authority for Montana officials to arrest a defendant wanted in another state for a crime is found in Section 46-30-227, MCA. **If the defendant does not consent to extradition, he must be committed to the county jail for not exceeding 30 days or admitted to bail,** Section 46-30-302, MCA, to provide time to obtain a requisition from the demanding state. Upon receipt of the requisition, the Governor of this state may then issue an arrest warrant against the defendant. Section 46-30-213, MCA. **The 30-day period is a limitation upon the power of Montana to hold the defendant without a requisition from the demanding state when Montana proceeds against him under Section 46-30-227, MCA (State v. Campbell, 761 P.2d 393, 233 Mont. 502 (Mont. 09/12/1988).) [emphasis added.]**

186. **Montana Annotated Code § 46-30-303. Bail while awaiting requisition.** “Unless the offense with which the prisoner is charged is shown to be an offense punishable by death or life imprisonment under the laws of the state in which it was committed, a judge or magistrate in this state may admit the person arrested to bail by bond or undertaking with sufficient sureties and in such sum as he deems proper, conditioned for his appearance before him at a time specified in such bond or undertaking and for his surrender to be arrested upon the warrant of the governor of this state.” Both Montana and Texas have identical laws as both adopted the Uniform Criminal Extradition Act. Judge Karen Townsend and/or Judge John W. Larson and/or the Missoula County Attorney’s Office knowingly and purposely violated the law by

telling Ellis County Texas that William M. Windsor could not be bonded out on either the Texas bond or the Montana bond that he provided. Ellis County Texas Jail officers and the Montana Bonding Company told William M. Windsor that Judge Karen Townsend wanted William M. Windsor to appear before her before any bond would be granted. There is no legal basis for this whatsoever. A Montana judge has no jurisdiction in Texas, but the Montana authorities and the Ellis County Texas authorities conspired to keep William M. Windsor in jail for 53 days without bond that was required by the Uniform Criminal Extradition Act which is the law in both states.

187. Exhibit 14 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of William M. Windsor's legal analysis of the many violations of the Texas Code of Criminal Procedure by the various authorities in Ellis County Texas. It is referenced and incorporated herein.

12 |
13 | The State of Montana to any Peace Officer of this State:

Information concerning the

188. The Bench Warrant was issued only to Peace Officers in Montana.

25 | You are therefore ordered, forthwith, to arrest the above-named Defendant and bring
26 | him/her before this Court or in the case of my absence or inability to ~~RECEIVED~~ nearest

1 | and most accessible Judge in this County, or if the arrest is made in another county, before
2 | a Judge of the County without unnecessary delay. This warrant may be served day or
3 | night.
4 |

189. The Bench Warrant called only for an arrest in a Montana county. The Bench Warrant was illegal to use to detain William M. Windsor in Ellis County Texas.

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WARRANTS CIVIL

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1 | Fourth Judicial District
2 | Missoula County Courthouse
Missoula, MT 59802
(406) 258-4780

190. And here's an interesting note: The Bench Warrant was not even sent to the Ellis County Sheriff's Department until October 29, 2014, a day after William M. Windsor was incarcerated.

191. **TEXAS CODE OF CRIMINAL PROCEDURE ARTICLE 51.13 (UNIFORM CRIMINAL EXTRADITION ACT) SEC. 13. ARREST PRIOR TO REQUISITION.** "Whenever any person within this State shall be charged on the oath of any credible person before any judge or magistrate of this State with the commission of any crime in any other State and except in cases arising under Section 6, with having fled from justice, or with having been convicted of a crime in that State and having escaped from confinement, or having broken the terms of his bail, probation or parole, or whenever complaint shall have been made before any judge or magistrate in this State setting forth on the affidavit of any credible person in another State that a crime has been committed in such other State and that the accused has been charged in such State with the commission of the crime, and except in cases arising under Section 6, has fled from justice, or with having been convicted of a crime in that State and having escaped from confinement, or having broken the terms of his bail, probation or parole and is believed to be in this State, the judge or magistrate shall issue a warrant directed to any peace officer commanding him to apprehend the person named therein, wherever he may be found in this State, and to bring him before the same or any other judge, magistrate or court who or which may be available in or convenient of access to the place where the arrest may be made, to answer the charge or complaint and affidavit, and a certified copy of the sworn charge or complaint and affidavit upon which the warrant is issued shall be attached to the warrant."

192. This details the requirements for arresting an allegedly-accused person in Texas based upon a warrant from a Texas magistrate, but prior to a requisition being sent to Texas requesting a Texas Governor's Warrant. The first and most important requirement is that there has to be an oath before a Texas judge or magistrate that the allegedly-accused committed a crime in another state and fled from justice. The Texas judge or magistrate must then issue a warrant directing a law enforcement officer to apprehend the person named. The allegedly-accused must then be brought before a Texas judge or magistrate to answer the charge or complaint and affidavit. A certified copy of the sworn charge or complaint and affidavit must be attached to the warrant. The allegedly-accused must be allowed to answer.

193. **State of Texas v. William M. Windsor, 14-158, District Court, Ellis County Texas**

(2014): Article 51. In this case, there was no warrant. There was no oath before a Texas judge or magistrate that the allegedly-accused committed a crime in another state and fled from justice. A Texas judge or magistrate did not issue a warrant directing a law enforcement officer to apprehend the person named. William M. Windsor was not brought before a Texas judge or magistrate to answer the charge or complaint and affidavit. As there was no warrant, there was no certified copy of a sworn charge or complaint and affidavit attached to the warrant. Windsor was not allowed to answer as is also required by this statute.

194. The law was violated, and William M. Windsor was “arrested” and incarcerated illegally.

195. **TEXAS CODE OF CRIMINAL PROCEDURE ARTICLE 51.13 (UNIFORM CRIMINAL EXTRADITION ACT) Sec. 14. ARREST WITHOUT A WARRANT.** “The arrest of a person may be lawfully made also by any peace officer or private person, without a warrant upon reasonable information that the accused stands charged in the courts of a State with a crime punishable by death or imprisonment for a term exceeding one year, but when so arrested the accused must be taken before a judge or magistrate with all practicable speed and complaint must be made against him under oath setting forth the ground for the arrest as in the preceding section; and thereafter his answer shall be heard as if he had been arrested on a warrant.”

196. This details the requirements for arresting an allegedly-accused person prior to a requisition being sent to Texas requesting a Texas Governor’s Warrant when there is no Texas Magistrate’s Warrant issued. The other requirements are the same as Section 13. The first and most important requirement is that there has to be an oath that the allegedly-accused committed a crime in another state and fled from justice. The allegedly-accused must then be speedily brought before a Texas judge or magistrate to answer the charge or complaint and affidavit. The allegedly-accused must be allowed to answer.

197. **State of Texas v. William M. Windsor, 14-158, District Court, Ellis County Texas**

(2014): Article 51. In this case, William M. Windsor was not arrested. He was taken before a magistrate the morning of October 29, 2014, but there was no complaint or oath before a Texas judge or magistrate that the

allegedly-accused committed a crime in another state and fled from justice. William M. Windsor was not given the opportunity to answer the charge or complaint and affidavit. There was no complaint or affidavit.

198. The Magistrate's document (Missoula Montana Criminal Case folder, file = **14-158-Texas-v-Windsor-Affidavit-of-William-M-Windsor-2014-12-11-Exhibit-C**) says "Affidavits charging you with these offenses (has not) been filed in Missoula County Montana Judge Karen Townsend." The Magistrate did not find probable cause. No facts had been presented to the Magistrate under oath to show probable cause. Thus, that section of the document is unsigned.

199. The law was violated, and William M. Windsor was incarcerated illegally. When neither section 13 nor section 14 have been complied with, there was no legal basis to "arrest" or incarcerate William M. Windsor.

200. **TEXAS CODE OF CRIMINAL PROCEDURE ARTICLE 51.13 (UNIFORM CRIMINAL EXTRADITION ACT) Sec. 15. COMMITMENT TO AWAIT REQUISITION; BAIL.** "If from the examination before the judge or magistrate it appears that the person held is the person charged with having committed the crime alleged and except in cases arising under Section 6, that he has fled from justice, the judge or magistrate must, by warrant reciting the accusation, commit him to the county jail for such time not exceeding thirty days and specified in the warrant, as will enable the arrest of the accused to be made under a warrant of the Governor on a requisition of the Executive Authority of the State having jurisdiction of the offense, unless the accused give bail as provided in the next section, or until he shall be legally discharged."

201. After either Section 13 or Section 14 takes place, the Texas judge or magistrate is to issue a warrant reciting the accusation and committing the allegedly-accused "for such time **not exceeding thirty days**" while the demanding state tries to obtain a Texas Governor's Warrant.

202. This section clearly states that thirty days was the time after which William M. Windsor was to be released. **THIS IS VERY IMPORTANT. 30 DAYS!** The maximum amount of time that an allegedly-accused person may be incarcerated in Texas on an extradition matter is 30 days. If a Texas magistrate or judge fails to issue a warrant specifying the 30 days, the law has been violated, and the

allegedly-accused has been incarcerated illegally. If the allegedly-accused is not discharged after 30 days, the law has been violated, and the allegedly-accused has been imprisoned illegally.

(See *Commonwealth ex rel. Knowles v. Lester*, 456 Pa. 423, 321 A.2d 637 (1974); *COMMONWEALTH PENNSYLVANIA EX REL. MARION JACOBS v. A.S. DIGIACINTO*, 468 A.2d 1118, 321 Pa. Super. 536 (07/26/83); *STATE UTAH v. TERRY ROBERT JENSEN*, 818 P.2d 551, 170 Utah Adv. Rep. 30 (09/30/91); *King v. Mitchell*, 14 Or.App. 382, 513 P.2d 519 (Or.App. 08/27/1973).)

203. **State of Texas v. William M. Windsor, 14-158, District Court, Ellis County Texas (2014):** William M. Windsor was detained on October 28, 2014. William M. Windsor appeared before the Texas Magistrate on October 29, 2014. December 19, 2014 was Day 53. William M. Windsor demanded his release daily in writing from Day 31 to Day 53. William M. Windsor should have been released without any bond required.

204. District Attorney Patrick Wilson gave false information to Judge Cindy Ermatinger saying the 30 days began at a later date. This is absolutely false. The statute is very clear, and there is case law on this. The actions of District Attorney Patrick Wilson in this case have been deliberately in violation of the law. William M. Windsor sent District Attorney Patrick Wilson a letter from jail detailing the law and the violations, and he ignored it. The Oath of Office that District Attorney Patrick Wilson took stated: "I swear that I will faithfully execute the duties of the office of District Attorney of Ellis County Texas, and will to the best of my ability preserve, protect, and defend the Constitution and laws of the United States and this state, so help me God." District Attorney Patrick Wilson violated his Oath of Office by intentionally ignoring the law and allowing it to be violated again and again and again.

205. William M. Windsor should have never been incarcerated, but he certainly should have been released after 30 days. Article 51.08 provides that once released, he could not be arrested upon a charge of the same offense except by a warrant from the Governor of Texas. As Judge Cindy Ermatinger has failed to discharge William M. Windsor, he is being denied that important legal right.

206. **TEXAS CODE OF CRIMINAL PROCEDURE ARTICLE 51.13 (UNIFORM CRIMINAL EXTRADITION ACT) Sec. 16. BAIL; IN WHAT CASES; CONDITIONS OF BOND.**

"Unless the offense with which the prisoner is charged is shown to be an offense punishable by death or life

imprisonment under the laws of the State in which it was committed, a judge or magistrate in this State may admit the person arrested to bail by bond, with sufficient sureties and in such sum as he deems proper, conditioned for his appearance before him at a time specified in such bond, and for his surrender, to be arrested upon the warrant of the Governor in this State.”

207. The allegedly-accused person is to be offered Texas bail unless the alleged crime is punishable by death or life in prison. A TEXAS judge or magistrate is to set the amount of the bail and the terms of the bond requiring the allegedly-accused to appear before the Texas judge or magistrate at a specified time. If any jail claims the demanding state sets the bail amount and bond terms, it is absolutely false. Judges in other states have no jurisdiction in Texas. If the allegedly-accused is not granted bail in Texas by a Texas judge or magistrate, this is a violation of the law, and the allegedly-accused is being incarcerated without bond in clear violation of the law.

208. **State of Texas v. William M. Windsor, 14-158, District Court, Ellis County Texas (2014):** The only bail that a Texas magistrate can set is a TEXAS bail, not a Montana bail/bond. William M. Windsor has reviewed approximately 100 Texas appellate court decisions on extradition, and none had a bond other than Texas. *Drake v. Spriggs*, No. 13-03-429-CV (Tex.App. Dist.13 12/14/2006) is exactly on point. Extradition of a Texas mad was sought by Colorado. He was denied a Texas bond, and the appellate court ruled this was an error.

(See also for Texas bonds on extradition matters: *Ex Parte Jerome Wall*, No. 02-11-00326-CR (Tex.App. Dist. 2 11/21/2012); *Ex Parte Pauline Fletcher Hasssenpflug*, 254 S.W.2d 835 (08/04/88); *Ex Parte Baugh*, No. 12-08-00367-CR (Tex.App. Dist. 12 02/19/2009); *Nelly Nichols et al v. State*, 255 S.W.2d 522, 158 Tex.Crim. 367 (02/04/53); *Ex Parte Parker*, No. 14-09-00493-CR (Tex.App. Dist.14 10/08/2009).)

209. There is nothing in Texas law to indicate that a Texas magistrate can order an out-of-state bond. A Texas magistrate has no such jurisdiction. There is nothing in Texas law to provide that a person being held for extradition is to post a bond from another state. The idea that a bond can be set in Texas by a judge in Montana is ludicrous. Forcing William M. Windsor to provide a Montana bond would deny his right to fight extradition. William M. Windsor would be forced to appear in Montana and would lose his rights to fight extradition and seek relief by habeas corpus.

210. William M. Windsor was outrageously denied bond and spent 52 days illegally incarcerated and denied bond.

211. **TEXAS CODE OF CRIMINAL PROCEDURE ARTICLE 51.13 (UNIFORM CRIMINAL EXTRADITION ACT) Sec. 17. EXTENSION OF TIME OF COMMITMENT; ADJOURNMENT.** "If the accused is not arrested under warrant of the Governor by the expiration of the time specified in the warrant or bond, a judge or magistrate may discharge him or may recommit him for a further period not to exceed sixty days, or a judge or magistrate may again take bail for his appearance and surrender, as provided in Section 16, but within a period not to exceed sixty days after the date of such new bond."

212. The amount of time that an allegedly-accused person may be held may be extended for another 60 days IF all laws were complied with prior to Day 30 and if the Texas judge or magistrate extends the time prior to Day 30. If the allegedly-accused is not discharged after 30 days and no extension is ordered by a Texas judge or magistrate, the law has been violated, and the allegedly-accused has been imprisoned illegally. If the matter is legally extended for up to 60 days, the allegedly-accused is again allowed a new Texas bond. If the allegedly-accused is held beyond 30 days and is not granted a new bail, the law has been violated, and the allegedly-accused has been imprisoned illegally.

213. **State of Texas v. William M. Windsor, 14-158, District Court, Ellis County Texas (2014):** In this case, there was no such request made prior to the expiration of 30 days. There was no order of extension.

E. ALLEGED CRIME #1 IS NOT A CRIME, AND THERE WAS NO VIOLATION OF A PROTECTIVE ORDER. ALLEGED CRIME #1 IS PUBLISHING A LEGAL DOCUMENT ONLINE REGARDING A MAN IN MICHIGAN THAT CONTAINED THE NAME OF SEAN BOUSHIE, A DEFENDANT IN CASE #88611 FILED ON DECEMBER 26, 2013 IN ELLIS COUNTY TEXAS.

214. The charge reads: "On or about the 4th day of May, 2014, the above-named Defendant (William M. Windsor) committed the offense of violation of an order of protection when, with knowledge of the order, purposely or knowingly violated a provision of an order provided for in 40-4-121 or an order of

protection under Title 40, chapter 15, to wit: "Defendant posted an article on his website, www.lawlessamerica.com, authored by himself, which mentioned Sean Boushie three times." [Exhibits 9 and 10 in the folder on the Flash Drive named Missoula Montana Criminal Case are true and correct copies of the Affidavit and Information filed in this case.]

215. William M. Windsor has no knowledge of such an order, so this charge must be dismissed. There isn't even an order of protection identified in this so-called "Information." Judge Karen Townsend abused her discretion when she signed an Order indicating there was probable cause when there was no evidence whatsoever that an order of protection even existed, much less what the terms might be. (See Exhibits 1, 9, 10, 11, and 12 on the Flash Drive in the folder named Missoula Montana Criminal Case.)

216. There is no order of protection that William M. Windsor is aware of that provides such a limitation. The Temporary Order of Protection that was void and/or expired did not restrict this.

217. The TOP was unintelligible, as William M. Windsor stated in his sworn Motion on August 26, 2013. [A true and correct copy of the MOTION FOR MODIFICATION OF TEMPORARY ORDER OF PROTECTION filed in the underlying case on August 26, 2013 where William M. Windsor asked the court to clarify the TOP is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case.] The TOP was never modified to make it intelligible.

218. William M. Windsor did not "purposely or knowingly" violate a provision of an order. Nowhere does any so-called "order of protection" state that William M. Windsor cannot publish an article that contains a legal document filed in a court and made a public record.

contemplated by § 40-15-201(2)(j), MCA. Finally, the condition requiring Windsor to transfer SeanBoushie.com into Boushie's name and to refrain from posting about Boushie on the site is also permissible within § 40-15-201(2)(j), MCA, under the circumstances. The

219. On June 10, 2014, the Montana Supreme Court ruled that the TOP provided that William M. Windsor could not post about Sean Boushie on www.SeanBoushie.com. He hasn't. This article was published on www.lawlessamerica.com. The Montana Supreme Court previously ruled in *Windsor v. Boushie* that blogging is not stalking and cannot be denied by any order of protection.

“...the offense of stalking does not apply to a constitutionally protected activity, § 45-5-220(2), MCA, and, as the District Court noted, the blogging alleged here involved First Amendment ‘free speech’ rights with which [Windsor and Boushie] each appear familiar and in which they regularly engage.” (*Windsor v. Boushie*, DA 13-0618 (Mont. 02/25/2014).)

220. *Montana Annotated Code 40-4-121* is cited but does not apply as anyone who reads it can see. “TITLE 40. FAMILY LAW CHAPTER 4. TERMINATION OF MARRIAGE, CHILD CUSTODY, SUPPORT - Part 1. Separation -- Dissolution of Marriage. 40-4-121. Temporary order for maintenance or support, temporary injunction, or temporary restraining order. It provides various things in regard to ‘...a proceeding for dissolution of marriage or for legal separation or in a proceeding for disposition of property or for maintenance or support following dissolution of the marriage....’”

221. William M. Windsor was not ever involved in marriage, child custody, or support with Sean Boushie or Wynette Boushie. Yet Tyler Dugger and Jennifer Clark cited this on each of the five alleged offenses.

222. Judge Karen Townsend abused her discretion when she stated in its Order that “...it appearing there is probable cause that the Defendant above-named committed the crimes charged.”

223. William M. Windsor most certainly didn’t violate *Montana Annotated Code 40-4-121*.

224. Tyler Dugger and Jennifer Clark have filed a false affidavit with the Court. They had no basis whatsoever to swear that William M. Windsor “purposely of knowingly violated a provision of an order provided for in 40-4-121....”

225. Tyler Dugger and Jennifer Clark have filed a false affidavit with the Court. They had no basis whatsoever to swear that William M. Windsor “purposely of knowingly violated “an order of protection under Title 40, chapter 15....”

226. Here’s the article that Alleged Crime #1 refers to: Sean D. Fleming Correction and Retraction Demand from William M. Windsor --
http://lawlessamerica.com/index.php?option=com_content&view=article&id=1394:sean-d-fleming-correction-and-retraction-demand-from-william-m-windsor&catid=139:joeyisalittlekid. Exhibit 15 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of this

article. Exhibit 16 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of the Second Request for Admissions to Sean D. Fleming, which is what the article is about.

227. This has been falsely portrayed to Missoula County Montana Judge Karen Townsend. This is not a “post” as can be clearly seen by examining the document. This is a 20-page article written and published on a news website. [Exhibit 17 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of the About Page for the website.] The article is about Sean D. Fleming of Madison Heights Michigan; it has nothing to do with Sean Boushie. The opening of the article says “The information printed here is from my Second Request for Admissions to Sean D. Fleming, and it seeks to have him to admit to the defamation.” So, this is an article that reprinted a legal document served on Sean D. Fleming, a Request for Admissions. Because Sean D. Fleming had made several defamatory statements about William M. Windsor, these had to be addressed. [Exhibit 18 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of Page 12 of the 20 pages, and it lists Request for Admissions numbers 231, 236, and 237.] Sean D. Fleming had published (#231) that William M. Windsor was retained by Lawless America Association to kill Sean Boushie. This is an outrageous false claim as William M. Windsor was never involved in any such thing. 236 and 237 had to do with two other statements by Sean D. Fleming about Sean Boushie.

228. William M. Windsor did publish this legal document in Texas. Montana protective orders are valid only in Montana. (*Montana Annotated Code § 40-15-301 (6).*) William M. Windsor’s actions in Texas have never been restricted in any manner.

229. When the TOP was valid, it prohibited only a “post.” This is not a “post.” A post is defined by Wikipedia as “to publish a message in an online forum or newsgroup.” William M. Windsor did not realize that Sean Boushie’s name was in the article, and he redacted it as soon as he became aware of it. There is nothing in the TOP to prohibit William M. Windsor from publishing Sean Boushie’s name (– “Respondent shall not post Petitioner’s name on liv.”). There is nothing in the TOP that says William M. Windsor cannot publish legal documents or cite what other people have published about Sean Boushie anywhere. William M. Windsor has bent over backwards for a year and a half to avoid problems, so he has

avoided posting or publishing Sean Boushie's name. William M. Windsor has now redacted the name from the article out of an abundance of caution due to these outrageous criminal charges. But the Montana Supreme Court has ruled that blogging by William M. Windsor is a Constitutionally-protected activity.

230. No judge can legally order anyone to not post, print, or display the name of a person. Freedom of Speech and Freedom of the Press are guaranteed by the First Amendment of the United States Constitution. Judge John W. Larson and Judge Karen Townsend took an oath of office that states: "I do solemnly swear (or affirm) that I will support, protect and defend the Constitution of the United States, and the Constitution of the State of Montana, and that I will discharge the duties of my office with fidelity (so help me God)." Assistant Missoula County Attorney Jennifer Clark similarly took the oath.

231. Judge John W. Larson, Judge Karen Townsend, and Assistant Missoula County Attorney Jennifer Clark have each violated their oaths of office by taking a position that the First Amendment to the United States Constitution does not apply to William M. Windsor. The same is true for former Missoula County Attorney Fred Van Vanderkirk and the new Missoula County Attorney, Kirsten Probst.

232. Montana law states very clearly (*Montana Annotated Code § 45-5-220*) that stalking does not apply to Constitutionally-protected activity. Freedom of speech and freedom of the press are the most fundamental of the Constitutionally-protected activities. Publishing a public legal document online cannot be restricted based upon the First Amendment to the United States Constitution.

233. There is no legal basis whatsoever to say that William M. Windsor must alter legal documents to change the content; that's just plain illegal.

234. Montana laws on protective orders are to promote safety and protection of all victims of stalking. Stalking is following someone or mailing, emailing, or having electronic communication with the protected person. Publishing a legal document online does not fall anywhere in the State of Montana's definition of "stalking." Sean Boushie is a serial stalker, not a victim. Sean Boushie's claims in his Application for a Temporary Order of Protection were a fabrication. [Exhibit 13 on the Flash Drive in the folder named Missoula Montana Criminal Case includes a true and correct copy of Sean Boushie's

Application.] [A true and correct copy of a Motion for Sanctions showing that Sean Boushie had committed perjury is on the Flash Drive -- Exhibit 61 in the folder named Missoula Montana Criminal Case.]

235. The TOP claims the court found that Sean Boushie was "in danger of harm." Sean Boushie was not harmed by the publication of a legal document regarding statements that were published online by Sean D. Fleming in Madison Heights Michigan. Arrest Sean D. Fleming!

236. William M. Windsor did not do anything purposely or knowingly. If publishing a legal document was to be restricted in the expired Temporary Order of Protection, the law requires that it be spelled out. William M. Windsor identified the ambiguity in the Temporary Order of Protection in an August 26, 2013 Motion for Modification. [A true and correct copy of the Motion for Modification filed in the underlying case on August 26, 2013 where William M. Windsor asked the court to clarify the TOP is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case.]

F. ALLEGED CRIME #2 IS NOT A CRIME, AND THERE WAS NO VIOLATION OF A PROTECTIVE ORDER. ALLEGED CRIME #2 IS PUBLISHING A LEGAL DOCUMENT ONLINE THAT CONTAINED THE NAME OF A DEFENDANT IN A LAWSUIT.

237. The charge reads: "On or about the 4th day of July, 2014, the above-named Defendant committed the offense of violation of an order of protection when, with knowledge of the order, purposely or knowingly violated a provision of an order provided for in 40-4-121 or an order of protection under Title 40, chapter 15, to wit: "Defendant posted an article on his website, www.lawlessamerica.com, authored by himself, which mentioned Sean Boushie once."

238. Here's the article that Alleged Crime #1 refers to: Judge asked to charge Sean D. Fleming with Stalking and issue a Protective Order --
http://lawlessamerica.com/index.php?option=com_content&view=article&id=1402:judge-asked-to-charge-sean-d-fleming-with-stalking-and-issue-a-protective-order&catid=139:joevisalittlekid [Exhibit 67 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of this article.] [Exhibit 21 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of the Petition for Protection against Sean D. Fleming that was filed and is a public record in Michigan.]

239. Again, this is not a "post." This is a 10-page article. It appeared on www.LawlessAmerica.com, not www.SeanBoushie.com. The article is about Sean D. Fleming; it has nothing to do with Sean Boushie. The opening of the article says "Bill Windsor has filed a Petition for a Personal Protection Order against Sean D. Fleming of Madison Heights Michigan. William M. Windsor has sued Sean D. Fleming because he has defamed him hundreds of times, has accused him of countless crimes, including plotting to commit mass murder, and has falsely and maliciously reported him to a wide variety of agencies for crimes that William M. Windsor has not committed. Sean D. Fleming of Madison Heights, Michigan has stalked William M. Windsor in various ways. Here is the text of the petition for a protection order against Sean D. Fleming that was filed in the Oakland County Michigan Superior Court on July 3, 2014:" Page 2 of the 10 pages refers to a claim made by Sean D. Fleming or some of his co-conspirators that "I have been making up information about Sean Boushie for years...."

240. William M. Windsor has no knowledge of such an order, so this charge must be dismissed. There isn't even an order of protection identified in this so-called "Information." Judge Karen Townsend abused her discretion when she signed an Order indicating there was probable cause when there was no evidence whatsoever that an order of protection even existed, much less what the terms might be. (See Exhibits 1, 9, 10, 11, and 12 on the Flash Drive in the folder named Missoula Montana Criminal Case.)

241. There is no order of protection that William M. Windsor is aware of that provides such a limitation. The TOP that was void and/or expired did not restrict this.

242. The TOP was unintelligible, as William M. Windsor stated in his sworn Motion on August 26, 2013. [A true and correct copy of the MOTION FOR MODIFICATION OF TEMPORARY ORDER OF PROTECTION filed in the underlying case on August 26, 2013 where William M. Windsor asked the court to clarify the TOP is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case.] The TOP was never modified to make it intelligible.

243. William M. Windsor did not "purposely or knowingly" violate a provision of an order. Nowhere does any so-called "order of protection" state that William M. Windsor cannot publish an article that contains a legal document filed in a court and made a public record.

contemplated by § 40-15-201(2)(j), MCA. Finally, the condition requiring Windsor to transfer SeanBoushie.com into Boushie's name and to refrain from posting about Boushie on the site is also permissible within § 40-15-201(2)(j), MCA, under the circumstances. The

244. On June 10, 2014, the Montana Supreme Court ruled that the TOP provided that William M. Windsor could not post about Sean Boushie on www.SeanBoushie.com. He hasn't. This article was published on www.lawlessamerica.com. The Montana Supreme Court previously ruled in *Windsor v. Boushie* that HIS blogging is not stalking and cannot be denied by any order of protection.

"...the offense of stalking does not apply to a constitutionally protected activity, § 45-5-220(2), MCA, and, as the District Court noted, the blogging alleged here involved First Amendment 'free speech' rights with which [Windsor and Boushie] each appear familiar and in which they regularly engage." (*Windsor v. Boushie*, DA 13-0618 (Mont. 02/25/2014).)

245. *Montana Annotated Code 40-4-121* is cited but does not apply as anyone who reads it can see. "TITLE 40. FAMILY LAW CHAPTER 4. TERMINATION OF MARRIAGE, CHILD CUSTODY, SUPPORT - Part 1. Separation -- Dissolution of Marriage. 40-4-121. Temporary order for maintenance or support, temporary injunction, or temporary restraining order. It provides various things in regard to '...a proceeding for dissolution of marriage or for legal separation or in a proceeding for disposition of property or for maintenance or support following dissolution of the marriage....'"

246. William M. Windsor was not ever involved in marriage, child custody, or support with Sean Boushie or Wynette Boushie. Yet Tyler Dugger and Jennifer Clark cited this on each of the five alleged offenses.

247. Judge Karen Townsend abused her discretion when she stated in its Order that "...it appearing there is probable cause that the Defendant above-named committed the crimes charged."

248. William M. Windsor most certainly didn't violate *Montana Annotated Code 40-4-121*.

249. Tyler Dugger and Jennifer Clark have filed a false affidavit with the Court. They had no basis whatsoever to swear that William M. Windsor "purposely of knowingly violated a provision of an order provided for in 40-4-121...."

250. Tyler Dugger and Jennifer Clark have filed a false affidavit with the Court. They had no basis whatsoever to swear that William M. Windsor “purposely of knowingly violated “an order of protection under Title 40, chapter 15....”

251. William M. Windsor did publish this legal document in Texas. Montana protective orders are valid only in Montana. (*Montana Annotated Code § 40-15-301 (6).*) William M. Windsor’s actions in Texas have never been restricted in any manner.

252. When the TOP was valid, it prohibited only a “post.” This is not a “post.” A post is defined by Wikipedia as “to publish a message in an online forum or newsgroup.” William M. Windsor did not realize that Sean Boushie’s name was in the article, and he redacted it as soon as he became aware of it. There is nothing in the TOP to prohibit William M. Windsor from publishing Sean Boushie’s name – “Respondent shall not post Petitioner’s name on liv.”). There is nothing in the TOP that says William M. Windsor cannot publish legal documents or cite what other people have published about Sean Boushie anywhere. William M. Windsor has bent over backwards for a year and a half to avoid problems, so he has avoided posting or publishing Sean Boushie’s name. William M. Windsor has now redacted the name from the article out of an abundance of caution due to these outrageous criminal charges. The Montana Supreme Court has ruled that blogging by William M. Windsor is a Constitutionally-protected activity.

253. No judge can legally order anyone to not post, print, or display the name of a person. Freedom of Speech and Freedom of the Press are guaranteed by the First Amendment of the United States Constitution. Judge John W. Larson and Judge Karen Townsend took an oath of office that states: “I do solemnly swear (or affirm) that I will support, protect and defend the Constitution of the United States, and the Constitution of the State of Montana, and that I will discharge the duties of my office with fidelity (so help me God).” Assistant Missoula County Attorney Jennifer Clark similarly took the oath.

254. Judge John W. Larson, Judge Karen Townsend, and Assistant Missoula County Attorney Jennifer Clark have each violated their oaths of office by taking a position that the First Amendment to the United States Constitution does not apply to William M. Windsor. The same is true for former Missoula County Attorney Fred Van Vanderkirk and the new Missoula County Attorney, Kirsten Probst.

255. Montana law states very clearly (*Montana Annotated Code § 45-5-220*) that stalking does not apply to Constitutionally-protected activity. Freedom of speech and freedom of the press are the most fundamental of the Constitutionally-protected activities. Publishing a public legal document online cannot be restricted based upon the First Amendment to the United States Constitution.

256. There is no legal basis whatsoever to say that William M. Windsor must alter legal documents to change the content; that's just plain illegal.

257. Montana law on protective orders are to promote safety and protection of all victims of stalking. Stalking is following someone or mailing, emailing, or having electronic communication with the protected person. Publishing a legal document online does not fall anywhere in the State of Montana's definition of "stalking." Sean Boushie is a serial stalker, not a victim. Sean Boushie's claims in his PTOP were a fabrication. [Exhibit 13 on the Flash Drive in the folder named Missoula Montana Criminal Charges includes a true and correct copy of Sean Boushie's Application.] [A true and correct copy of a Motion for Sanctions showing that Sean Boushie had committed perjury is on the Flash Drive -- Exhibit 61 in the folder named Missoula Montana Criminal Case.]

258. The TOP claims the court found that Sean Boushie was "in danger of harm." Sean Boushie was not harmed by the publication of a legal document regarding statements that were published online by Sean D. Fleming in Madison Heights Michigan. Arrest Sean D. Fleming!

259. William M. Windsor did not do anything purposely or knowingly. If publishing a legal document was to be restricted in the expired TOP, the law requires that it be spelled out. William M. Windsor identified the ambiguity in the TOP in an August 26, 2013 Motion for Modification. [A true and correct copy of the Motion for Modification filed in the underlying case on August 26, 2013 where William M. Windsor asked the court to clarify the TOP is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case.] The Montana Supreme Court has ruled that blogging by William M. Windsor is a Constitutionally-protected activity.

G. ALLEGED CRIME #4 IS NOT A CRIME, AND THERE WAS NO VIOLATION OF A PROTECTIVE ORDER.. ALLEGED CRIME #4 (A FELONY) IS USING TWITTER TO SEND A TWEET.

260. The charge reads: "On or about the 30th day of December, 2013, the above-named Defendant committed the offense of violation of an order of protection when, with knowledge of the order, purposely or knowingly violated a provision of an order provided for in 40-4-121 or an order of protection under Title 40, chapter 15, to wit: "Defendant posted Sean Boushie's name on Twitter, a third or subsequent offense." Elsewhere, this is stated to be the posting of a video with the title: "Bill Windsor is banned from the University of Montana and Sean Boushie. Corruption at its finest."



261. William M. Windsor does not have a copy of this alleged Tweet. William M. Windsor was in Texas on December 30, 2013 recovering from a fractured skull, and he did not send a Tweet on December 30, 2013. There can be no proof that William M. Windsor sent such a Tweet.

262. William M. Windsor has no knowledge of such an order, so this charge must be dismissed. There isn't even an order of protection identified in this so-called "Information." Judge Karen Townsend abused her discretion when she signed an Order indicating there was probable cause when there was no evidence whatsoever that an order of protection even existed, much less what the terms might be.

263. There is no order of protection that William M. Windsor is aware of that provides such a limitation. The Temporary Order of Protection that was void, expired, and did not restrict this. It made no reference to Tweeting.

contemplated by § 40-15-201(2)(j), MCA. Finally, the condition requiring Windsor to transfer SeanBoushie.com into Boushie's name and to refrain from posting about Boushie on the site is also permissible within § 40-15-201(2)(j), MCA, under the circumstances. The

264. On June 10, 2014, the Montana Supreme Court ruled that the TOP provided that William M. Windsor could not post about Sean Boushie on www.SeanBoushie.com. He hasn't, and this Tweet was sent on Twitter. Strangely, the Montana Supreme Court previously ruled in *Windsor v. Boushie* that William M.

Windsor's blogging is not stalking and cannot be denied by any order of protection. Tweeting is a short form of blogging.

"...the offense of stalking does not apply to a constitutionally protected activity, § 45-5-220(2), MCA, and, as the District Court noted, the blogging alleged here involved First Amendment 'free speech' rights with which [Windsor and Boushie] each appear familiar and in which they regularly engage." (*Windsor v. Boushie*, DA 13-0618 (Mont. 02/25/2014).)

265. The TOP was unintelligible, as William M. Windsor stated in his sworn Motion on August 26, 2013. [A true and correct copy of the Motion for Modification filed in the underlying case on August 26, 2013 where William M. Windsor asked the court to clarify the TOP is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case.] The TOP was never modified to make it intelligible.

266. William M. Windsor did not "purposely or knowingly" violate a provision of an order. Nowhere does any so-called "order of protection" state that William M. Windsor cannot send a Tweet. A Tweet is not a "post," but it is a form of blogging.

267. *Montana Annotated Code 40-4-121* is cited but does not apply as anyone who reads it can see. "TITLE 40. FAMILY LAW CHAPTER 4. TERMINATION OF MARRIAGE, CHILD CUSTODY, SUPPORT - Part 1. Separation -- Dissolution of Marriage. 40-4-121. Temporary order for maintenance or support, temporary injunction, or temporary restraining order. It provides various things in regard to '...a proceeding for dissolution of marriage or for legal separation or in a proceeding for disposition of property or for maintenance or support following dissolution of the marriage....'"

268. William M. Windsor was not ever involved in marriage, child custody, or support with Sean Boushie or Wynette Boushie. Yet Tyler Dugger and Jennifer Clark cited this on each of the five alleged offenses.

269. Judge Karen Townsend abused her discretion when she stated in its Order that "...it appearing there is probable cause that the Defendant above-named committed the crimes charged."

270. William M. Windsor most certainly didn't violate *Montana Annotated Code 40-4-121*.

271. Tyler Dugger and Jennifer Clark have filed a false affidavit with the Court. They had no basis whatsoever to swear that William M. Windsor "purposely or knowingly violated a provision of an order provided for in 40-4-121...."

272. Tyler Dugger and Jennifer Clark have filed a false affidavit with the Court. They had no basis whatsoever to swear that William M. Windsor “purposely of knowingly violated “an order of protection under Title 40, chapter 15....”

273. Exhibit 22 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of the home page of William M. (Bill) Windsor's Twitter feed. It shows that 13,081 Tweets have been sent. Please note the second Tweet on the page (circled). This shows the name William M. Windsor and @LawlessAmerica. But look at the second page. It shows the Tweet was sent by Lawless America Massachusetts. There are approximately 50 state Lawless America Facebook pages that have been maintained by people other than William M. Windsor. William M. Windsor has never seen that Tweet, nor has he seen very many of the 13,081 Tweets. Twitter offers a variety of applications for Tweeting. Exhibit 23 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of information off William M. Windsor's Twitter account to show the Twitter Applications used by William M. Windsor's account to show that automatic Tweets are generated from a variety of programs used in a variety of locations.

274. William M. Windsor did not send such a Tweet.

275. When the TOP was still valid, it prohibited only a “post.” A Tweet is not a “post.” A post is defined as “to publish a message in an online forum or newsgroup.”

276. There is nothing in the TOP to prohibit William M. Windsor from publishing Sean Boushie's name in a Tweet – “Respondent shall not post Petitioner's name on liv.”). There is nothing in the TOP that says someone unknown to William M. Windsor may not Tweet the name of Sean Boushie, or post it, or publish it, or anything else.

277. No judge can legally order anyone to not post, print, or display the name of a person. Freedom of Speech and Freedom of the Press are guaranteed by the First Amendment of the United States Constitution. Judge John W. Larson and Judge Karen Townsend took an oath of office that states: “I do solemnly swear (or affirm) that I will support, protect and defend the Constitution of the United States, and the Constitution of the State of Montana, and that I will discharge the duties of my office with fidelity

(so help me God).” Assistant Missoula County Attorney Jennifer Clark took the same oath of office as did Missoula County Attorney Fred Van Valkenburg and Missoula County Attorney Kirsten Probst.

278. Judge John W. Larson, Judge Karen Townsend, and Assistant Missoula County Attorney Jennifer Clark have each violated their oaths of office by taking a position that the First Amendment to the United States Constitution does not apply to William M. Windsor. The same is true for former Missoula County Attorney Fred Van Valkenburg and the new Missoula County Attorney, Kirsten Probst.

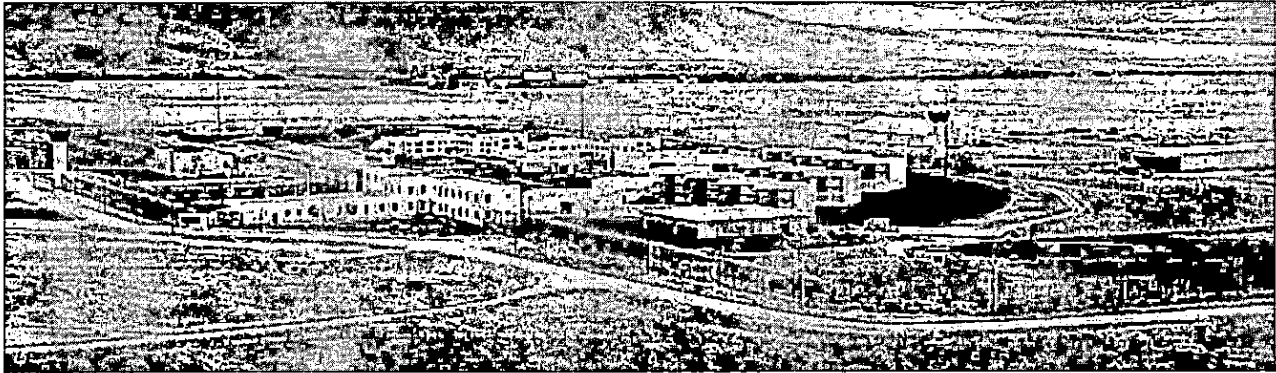
279. Montana laws on protective orders are to promote safety and protection of all victims of stalking. Stalking is following someone or mailing, emailing, or having electronic communication with the protected person. Tweeting to your followers on Twitter does not fall anywhere in the definition of “stalking.” Sean Boushie is a serial stalker, not a victim. As discussed above, Sean Boushie’s claims in his Petition for a Temporary Order of Protection were a fabrication.

280. Montana law states very clearly (MCA 45-5-220) that stalking does not apply to Constitutionally-protected activity. Freedom of speech and freedom of the press are the most fundamental of the Constitutionally-protected activities. Tweeting cannot be restricted based upon the First Amendment to the United States Constitution.

281. The Montana Supreme Court has ruled that blogging by William M. Windsor is a Constitutionally-protected activity.

282. William M. Windsor did not do anything purposely or knowingly. If someone unknown to you tweeting the name of Sean Boushie was to be restricted in the expired TOP, the law requires that it be spelled out. William M. Windsor identified the ambiguity in the TOP in a Motion filed three days after he was served. [A true and correct copy of the Motion for Modification filed in the underlying case on August 26, 2013 where William M. Windsor asked the court to clarify the TOP is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case.]

283. The TOP claims the court found that Sean Boushie was “in danger of harm.” Sean Boushie was not harmed by a Tweet that states that the actions taken involving Sean Boushie in Montana is corruption at its finest. That’s a fact.



284. Two years in Montana State Prison for having a two-word proper name in a Tweet. Wow. If all 13,081 Tweets had Sean Boushie’s name in them, William M. Windsor would be looking at 26,162 years in the Montana State Prison. That would be a record. If necessary, William M. Windsor will go for a record in his stand on his Constitutional rights to freedom of speech / press.

H. ALLEGED CRIME #5 IS NOT A CRIME, AND THERE WAS NO VIOLATION OF A PROTECTIVE ORDER. ALLEGED CRIME #5 (A FELONY) IS SENDING AN EMAIL.

285. The charge reads: “On or about the 6th day of February, 2014, the above-named Defendant committed the offense of violation of an order of protection when, with knowledge of the order, purposely or knowingly violated a provision of an order provided for in 40-4-121 or an order of protection under Title 40, chapter 15, to wit: “Defendant emailed Claudia Denker-Eccles, Associate Counsel for the University of Montana, a third or subsequent offense.”

286. Exhibit 24 in the folder on the Flash Drive named Missoula Montana Criminal Case is a true and correct copy of something that was sent on that date: Notice of Filing of Affidavit of Mary Wilson. This is a legal document that William M. Windsor was required to send to Claudia Denker-Eccles by federal law. As she was the attorney-of-record for the University of Montana, a defendant in a case filed by William M. Windsor, she had to be sent this notice and affidavit. Exhibit 25 in the folder on the Flash Drive named

of Montana was a defendant, that she is the listed agent, and that she was served with the required legal service copy.

287. William M. Windsor has no knowledge of such an order, so this charge must be dismissed. There isn't even an order of protection identified in this so-called "Information." Judge Karen Townsend abused her discretion when she signed an Order indicating there was probable cause when there was no evidence whatsoever that an order of protection even existed, much less what the terms might be.

288. There is no order of protection that William M. Windsor is aware of that provides such a limitation. The TOP that was void and expired did not restrict sending emails to attorneys required by federal law.

289. The TOP was unintelligible, as William M. Windsor stated in his sworn Motion on August 26, 2013. [A true and correct copy of the Motion for Modification filed in the underlying case on August 26, 2013 where William M. Windsor asked the court to clarify the TOP is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case.] The TOP was never modified to make it intelligible.

290. William M. Windsor did not "purposely or knowingly" violate a provision of an order. Nowhere does any so-called "order of protection" state that William M. Windsor must violate federal law and lose a civil lawsuit because he failed to serve legal documents on the defendants and their counsel.

291. *Montana Annotated Code 40-4-121* is cited but does not apply as anyone who reads it can see. "TITLE 40. FAMILY LAW CHAPTER 4. TERMINATION OF MARRIAGE, CHILD CUSTODY, SUPPORT - Part 1. Separation -- Dissolution of Marriage. 40-4-121. Temporary order for maintenance or support, temporary injunction, or temporary restraining order. It provides various things in regard to '...a proceeding for dissolution of marriage or for legal separation or in a proceeding for disposition of property or for maintenance or support following dissolution of the marriage....'"

292. William M. Windsor was not ever involved in marriage, child custody, or support with Sean Boushie or Wynette Boushie. Yet Tyler Dugger and Jennifer Clark cited this on each of the five alleged offenses.

293. Judge Karen Townsend abused her discretion when she stated in its Order that "...it appearing there is probable cause that the Defendant above-named committed the crimes charged."

294. William M. Windsor most certainly didn't violate *Montana Annotated Code 40-4-121*.

295. Tyler Dugger and Jennifer Clark have filed a false affidavit with the Court. They had no basis whatsoever to swear that William M. Windsor "purposely of knowingly violated a provision of an order provided for in 40-4-121...."

296. Tyler Dugger and Jennifer Clark have filed a false affidavit with the Court. They had no basis whatsoever to swear that William M. Windsor "purposely of knowingly violated "an order of protection under Title 40, chapter 15...."

297. Page 1 of the TOP says the "Protected Persons" are Sean Boushie and Wynette Boushie. Claudia Denker-Eccles is not a "protected person."

298. Page 2 of the TOP says the "2. Respondent must not harass, annoy, disturb the peace of, telephone, email, contact, or otherwise communicate directly or indirectly with Petitioner and the following Protected Persons: Wynette Boushie and U of M Staff."

299. U of M Staff was never defined. William M. Windsor did not do anything purposely or knowingly. If publishing a legal document was to be restricted in the expired Temporary Order of Protection, the law requires that it be spelled out. William M. Windsor identified the ambiguity in the Temporary Order of Protection in a Motion filed three days after he was served. [A true and correct copy of the Motion for Modification filed in the underlying case on August 26, 2013 where William M. Windsor asked the court to clarify the TOP is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case.]

300. Montana law provides that orders of protection may apply only to the applicants. (*Montana Annotated Code 40-15-116, 40-15-101, 40-15-102*.) Attorney Claudia Denker-Eccles was not a victim nor was she an applicant, so this does not apply to her.

301. Legal mail is not restricted by Montana protective order statutes. In fact, the *Montana Annotated Code 40-15-117* has a very specific provision to allow protected parties to opt to have the

Montana Secretary of State receive their legal mail instead of them. Sean Boushie, Wynette Boushie, and Attorney Claudia Denker-Eccles did not opt for this.

From: Denker-Eccles, Claudia <claudia.eccles@mso.umt.edu>
Sent: Thursday, August 29, 2013 12:31 PM
To: Nobodies@att.net
Cc: claudia.eccles@umontana.edu

302. Sean Boushie and Attorney Claudia Denker-Eccles have sent legal mail to William M. Windsor that required responses. [Exhibit 26 in the folder on the Flash Drive named Missoula Montana Criminal Case is a true and correct copy of an email that Claudia Denker-Eccles sent to William M. Windsor on August 29, 2013 a time that the Temporary Order of Protection was in place.] [A true and correct copy of some of the mail sent to William M. Windsor by Sean Boushie is on the Flash Drive -- Exhibit 48 in the folder named Missoula Montana Criminal Case.]

303. William M. Windsor did send this from Texas. Montana protective orders are valid only in Montana. (Montana Annotated Code 40-15-301 (6).) Even if there was a protective order, William M. Windsor's actions in Texas are not restricted in any manner.

304. There is nothing in the expired TOP to prohibit William M. Windsor from having contact with the attorney for the University of Montana. He was required by Federal Rules of Civil Procedure Rule 5 to do so.

305. To be charged with a felony for sending a required legal document to an attorney in a lawsuit is perhaps even more outlandish than being charged with a felony for a Tweet.

I. ALLEGED CRIME #3 IS NOT A CRIME, AND THERE WAS NO VIOLATION OF A PROTECTIVE ORDER. ALLEGED CRIME #3 (A FELONY) IS NOT GIVING CONTROL OF BILL WINDSOR'S TV SHOW WEBSITE TO SEAN BOUSHIE.

306. The charge reads: "On or about the 2nd day of October, 2014, the above-named Defendant committed the offense of violation of an order of protection when, with knowledge of the order, purposely or knowingly violated a provision of an order provided for in 40-4-121 or an order of protection under Title 40,

chapter 15, to wit: "Defendant has not released control of the website www.seanboushie.com to Sean Boushie, a third or subsequent offense."

307. William M. Windsor has never received any such request. This was included in Sean Boushie's perjured Petition, but that would have been addressed in the required hearing that was never held.

308. William M. Windsor has no knowledge of such an order, so this charge must be dismissed. There isn't even an order of protection identified in this so-called "Information." Judge Karen Townsend abused her discretion when she signed an Order indicating there was probable cause when there was no evidence whatsoever that an order of protection even existed, much less what the terms might be.

309. There is no order of protection that William M. Windsor is aware of that provides such a requirement. The TOP that was void and expired raised this as a ridiculous issue, but an ex parte petition by a serial liar cannot be used by any court to take away a person's property.

310. The TOP was unintelligible, as William M. Windsor stated in his sworn Motion on August 26, 2013. [A true and correct copy of the Motion for Modification filed in the underlying case on August 26, 2013 where William M. Windsor asked the court to clarify the TOP is on the Flash Drive -- Exhibit 41 in the folder named Missoula Montana Criminal Case.] The TOP was never modified to make it intelligible.

311. This issue was appealed on August 26, 2013 and remained on appeal until June 10, 2014 when the matter was remanded to the Missoula Municipal Court for the required hearing. No hearing was ever held, and the 20 days passed and the TOP expired.

312. This charge was made as of October 3, 2014. The TOP expired at the very latest on June 27, 2014 when no hearing was held. There is no legal basis for such a charge.

313. William M. Windsor did not "purposely or knowingly" violate a provision of an order. Nowhere does any so-called "order of protection" state that William M. Windsor must release control of the website www.seanboushie.com to Sean Boushie by any specific date or in any specific manner or prior to notice and an opportunity to be heard. No one has ever asked William M. Windsor to do anything in this regard. Exhibit 29 on the Flash Drive in the folder named Missoula Montana Criminal Case is a Motion to Dismiss in which William M. Windsor states that there was never a hearing as required by law, and there

were no grounds for a permanent order of protection because it had to be based on a history of violence, and there was none. There was no legal way for William M. Windsor to be permanently required to release his property or stop posting “on lit,” or “on it,” or “on liu”, or “on liv.” The Montana Supreme Court has previously ruled that blogging by William M. Windsor is a Constitutionally-protected activity.

314. *Montana Annotated Code 40-4-121* is cited but does not apply as anyone who reads it can see. “TITLE 40. FAMILY LAW CHAPTER 4. TERMINATION OF MARRIAGE, CHILD CUSTODY, SUPPORT - Part 1. Separation -- Dissolution of Marriage. 40-4-121. Temporary order for maintenance or support, temporary injunction, or temporary restraining order. It provides various things in regard to ‘...a proceeding for dissolution of marriage or for legal separation or in a proceeding for disposition of property or for maintenance or support following dissolution of the marriage....’”

315. William M. Windsor was not ever involved in marriage, child custody, or support with Sean Boushie or Wynette Boushie. Yet Tyler Dugger and Jennifer Clark cited this on each of the five alleged offenses.

316. Judge Karen Townsend abused her discretion when she stated in its Order that “...it appearing there is probable cause that the Defendant above-named committed the crimes charged.”

317. William M. Windsor most certainly didn’t violate *Montana Annotated Code 40-4-121*.

318. Tyler Dugger and Jennifer Clark have filed a false affidavit with the Court. They had no basis whatsoever to swear that William M. Windsor “purposely of knowingly violated a provision of an order provided for in 40-4-121....”

319. Tyler Dugger and Jennifer Clark have filed a false affidavit with the Court. They had no basis whatsoever to swear that William M. Windsor “purposely of knowingly violated “an order of protection under Title 40, chapter 15....”

320. There is no explanation of what “released” means. There is no date given for a “release.” There is no indication that this requested relief somehow takes precedence over the very clear law that required a hearing within 20 days.

321. There is no indication that this requested relief somehow takes precedence over William M. Windsor's personal and business property rights.

322. There is no basis whatsoever to take away a website that cites facts and provides the evidence.

323. SeanBoushie.com has been William M. Windsor's property, and no court has the right to take someone's property without due process of law. This type of relief cannot be ordered on an ex parte basis. Due process requires notice and an opportunity to be heard. William M. Windsor had no notice, and he was never heard. Therefore, William M. Windsor is very confident that he had no such obligation. In fact, Missoula County Montana Judge Karen Townsend seems to agree because the Order (Exhibit 12 in the folder on the Flash Drive named Missoula Montana Criminal Case) does not require this.

324. The "About Page" page for the website (www.seanboushie.com) begins with this: "SeanBoushie.com is a news report to expose Sean Boushie of the University of Montana as a cyberstalker. Bill Windsor of Lawless America is producing a TV special about the University of Montana and Sean Boushie. This online publication will provide evidence of the cyberstalking activities of Sean Boushie as well as threats that he has made to Bill Windsor and others." [Exhibit 2 on the Flash Drive in the folder named Missoula Montana Criminal Case is the About Page.]

325. No court has the right to require the media to stop publishing or give its websites to those the media is exposing, especially when there can be no proof that anything that William M. Windsor has published is false. Operating a news website with factual information is a Constitutionally-protected activity. Freedom of the press protects the right to obtain and publish information or opinions without government censorship or fear of punishment. This conflicts with the Montana Supreme Court's previous decision in *Windsor v. Boushie* that blogging is not stalking and cannot be denied by any order of protection. Therefore, you darned sure can't take away William M. Windsor's website.

"...the offense of stalking does not apply to a constitutionally protected activity, § 45-5-220(2), MCA, and, as the District Court noted, the blogging alleged here involved First Amendment 'free speech' rights with which [Windsor and Boushie] each appear familiar and in which they regularly engage." (*Windsor v. Boushie*, DA 13-0618 (Mont. 02/25/2014).)

326. Upon information and belief, Sean Boushie is paid by the government to stalk people such as William M. Windsor. He does it at the University of Montana, as William M. Windsor has proven. His TV show and movie will expose this corruption, and the corrupt authorities in Montana want to stop William M. Windsor, so they do things like this.

J. WILLIAM M. WINDSOR IS THE VICTIM OF FRAUD UPON THE COURT.

327. The claim that the TOP has remained valid for over 500 days is the product of fraud upon the court. And failure to issue a temporary order of protection against Sean Boushie constitutes fraud upon the court, obstruction of justice, and other criminal offenses by the judges involved.

328. In a Motion for Discovery filed on August 18, 2014, William M. Windsor stated the following: "This is a case where the dishonesty of SEAN BOUSHIE is critical to WINDSOR'S case. SEAN BOUSHIE swore to the Court that WINDSOR had a gun in Montana and he was afraid. WINDSOR has proof that he did not have a gun in Montana as SEAN BOUSHIE claimed in his petition. The only gun that WINDSOR has owned or had in his possession in the last 30 years was locked in a case on a top shelf in his now ex-wife's home in Marietta, Georgia from February 8, 2013 to December 4, 2013. WINDSOR left his home on a filming trip in April and did not return until December 4, 2013. WINDSOR'S ex-wife will testify that when she separated WINDSOR'S possessions from hers after the divorce on June 12, 2013, she removed the gun from the shelf and put it into a suitcase where it remained until WINDSOR came to Atlanta to retrieve his possessions on December 4, 2013. Barbara Windsor cannot come to Missoula Montana for the hearing, and she is a hostile witness. Therefore, WINDSOR seeks approval to conduct a short deposition by telephone. MCA Rule 26 provides in civil matters that "Parties may obtain discovery...." MCA Title 46, Chapter 15 provides for discovery in criminal matters. The Uniform District Court Rules contain no rules limiting discovery. The Local Rules for the Fourth Judicial District do not contain any rules limiting discovery. The Uniform Municipal Court Rules of Appeal to District Court do not contain any rules limiting discovery. (See SWORN AFFIDAVIT OF WILLIAM M. WINDSOR DATED NOVEMBER 18, 2013, ¶163.) WINDSOR needs discovery to help him successfully defend against the lies of BOUSHIE. This violates Montana Constitution Section 24 - Rights of the accused and Montana Constitution Section 16 - The

administration of justice. Discovery is essential to proving that BOUSHIE has committed perjury in his entire Petition. A District Court Order cites *Lear v. Jamrogowicz* as authority that discovery is not allowed in orders of protection matters. The facts are not at all the same here. WINDSOR has an extraordinary need for discovery as it is the only way to prove he is the victim. TOP's were not designed so that a stalker (BOUSHIE) can reinjure his victim (WINDSOR), but that is what has happened here, and WINDSOR'S rights to due process must be paramount. MCA Rule 26 provides in civil matters that "Parties may obtain discovery...." MCA Title 46, Chapter 15 provides for discovery in criminal matters. The Uniform District Court Rules contain no rules limiting discovery. The Local Rules for the Fourth Judicial District do not contain any rules limiting discovery. The Uniform Municipal Court Rules of Appeal to District Court do not contain any rules limiting discovery. Since BOUSHIE has lied under oath about sending emails, WINDSOR must be able to obtain discovery from BOUSHIE and others who have the evidence needed. Unfortunately, liars like BOUSHIE often get away with their lies in court proceedings. Discovery is the only way that WINDSOR will be able to prove the lies of BOUSHIE. Denying discovery to WINDSOR is a violation of Montana Constitution Section 24 - Rights of the accused and Section 16 - The administration of justice. In this case, there are clearly "exceptional circumstances." Every claim by BOUSHIE has been directly controverted by WINDSOR, and WINDSOR has provided sworn testimony and properly authenticated evidence to prove that BOUSHIE has committed massive perjury. It is essential that WINDSOR be given the opportunity to obtain the discovery that he needs to prove the lies of the PETITIONER."

329. Judge John W. Larson ignored this Motion for Discovery. The only explanation for why is that Judge John W. Larson is totally corrupt, and he is protecting Sean Boushie. No honest judge could deny discovery with facts such as these.

330. Missoula County Montana Judge John W. Larson simply ignored all of William M. Windsor's evidence and sworn testimony and evidence that establish that Sean Boushie committed significant perjury. [Motion for Reconsideration, folder DA-13-0785, files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-22 and DA-13-0785-Windsor-v-Boushie-Appellants-Brief-

2014-02-05-Exhibit-24 ¶¶157-159.] Missoula County Montana Judge John W. Larson did this because he is corrupt; there is no valid excuse.

331. Missoula County Montana Judge John W. Larson committed obstruction of justice and corruption in allowing unsworn claims and information to be considered as fact and in making absolutely false statements in his order affirming the Municipal Court TOP that was issued ex parte based on a totally perjured affidavit. [Folder DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-21, P.3, 4.] Missoula County Montana Judge John W. Larson claimed that a brief may be accompanied by "appropriate supporting documents," and then outrageously took the position that claims of fact and other information not supported by sworn affidavit or testimony are somehow "appropriate" and may be considered as facts by Missoula County Montana Judge John W. Larson. Horse manure. Missoula County Montana Judge John W. Larson has allowed such information to be considered as fact and has incorporated this information in consideration of this matter and in the November 18, 2013 Order. 17 sentences that purport to be facts in the ORDER AFFIRMING THE MUNICIPAL COURT RULING [DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-21] are absolutely false and most are not supported by any admissible evidence as can be seen by reviewing the only sworn affidavit, Folder DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-1. Folder DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-28 shows the 17 false statements in the November 18, 2013 Order.

332. Missoula County Montana Judge John W. Larson completely ignored the massive sworn testimony and evidence of William M. Windsor. William M. Windsor filed and the RECORD contains 203 pages of William M. Windsor's sworn testimony under penalty of perjury and 140 authenticated exhibits. [Folder DA-13-0785, five files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-XX (3, 4, 19, 22, 24.)

333. Missoula County Montana Judge John W. Larson ignored the undeniable fact that William M. Windsor has sworn under oath under penalty of perjury before a notary that Sean Boushie's sworn statements are false. The RECORD contains detailed sworn filings and affidavits by William M. Windsor

that controvert virtually everything alleged by Sean Boushie and his attorneys. [Folder DA-13-0785, five files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-XX (3, 4, 19, 22, 24.)] There is absolutely no legal basis whatsoever to allow this or any court to ignore the undeniable facts before it as Missoula County Montana Judge John W. Larson has done. Missoula County Montana Judge John W. Larson has ignored his obligation to rule based upon the facts and to conduct a hearing to allow William M. Windsor to provide further undeniable evidence of the massive perjury and criminal acts by Sean Boushie.

334. Missoula County Montana Judge John W. Larson has considered information and has included information in the November 14, 2013 Order that is false, misleading, and does not appear in the record of the Court. [DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-21.] Folder DA-13-0785, file = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-28 identifies and numbers 17 false statements.

335. False Statement #1 – William M. Windsor was never allowed to file a Brief.

336. False Statement #2 – No such allegation or facts appear in the RECORD of this or any court. [Motion for Reconsideration, folder DA-13-0785, files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-22 and DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-24 ¶142.] The claim by Missoula County Montana Judge John W. Larson that William M. Windsor has filed “frivolous actions in courts all over the country” is a blatant lie, is not supported by any facts [Exhibit#1], and appears to be an intentional lie by Missoula County Montana Judge John W. Larson.

337. False Statement #3 – William M. Windsor has filed sworn evidence showing this to be false. William M. Windsor is not a vexatious litigant and never has been. [Motion for Reconsideration, folder DA-13-0785, files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-22 and DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-24 ¶¶143-151.] In this matter, William M. Windsor had an action filed against him. Even if William M. Windsor was a vexatious litigant, which he is not, it would be totally irrelevant and is absolutely inappropriate for Missoula County Montana Judge John W. Larson to include in its November 14, 2013 Order.

338. False Statement #4 – There is no valid evidence to support such a claim. There is no valid assertion that William M. Windsor's websites were created for any improper purpose. Freedom of speech protects William M. Windsor from making true statements on a website., [Motion for Reconsideration, folder DA-13-0785, files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-22 and DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-24 ¶152,153.]

339. False Statements #5 and #6 – This false, and there is no evidence to support such a claim. There is not even evidence in the RECORD to support that these sites are William M. Windsor's. Missoula County Montana Judge John W. Larson has aided and abetted Sean Boushie in his criminal activities by misusing information that is not part of the RECORD in its campaign to obstruct justice.

340. False Statement #7 – William M. Windsor never received a cease and desist letter from Sean Boushie.

341. False Statement #8 – This is absolutely false. [Motion for Reconsideration, folder DA-13-0785, files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-22 and DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-24 ¶155.] There is no valid evidence in this regard. There is no truth whatsoever to this false claim.

342. False Statement #9 – There is no evidence in the RECORD to support making any such statement. Motion for Reconsideration, folder DA-13-0785, files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-22 and DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-24 ¶156.]

343. False Statement #10 – William M. Windsor did no such thing. [Motion for Reconsideration, folder DA-13-0785, files = DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-22 and DA-13-0785-Windsor-v-Boushie-Appellants-Brief-2014-02-05-Exhibit-24, ¶164.]

344. False Statement #11 – William M. Windsor has not harassed, threatened, or intimidated Sean Boushie with SeanBoushie.com. A media website is not encompassed by, and William M. Windsor has not communicated with Sean Boushie by mail or by electronic communication as defined by 45-8-21.3 or 45-

5-220(1)(a)(b). William M. Windsor never harassed, threatened, or intimidated Sean Boushie and his wife, and he never posted any defamatory or false information.

345. False Statement #12 – William M. Windsor didn't follow anyone around; he came to Montana to film a TV show in static locations. The RECORD contains no evidence to support this false statement.

346. False Statement #13 – William M. Windsor never received a cease and desist letter from Sean Boushie, and the RECORD does not indicate that he did.

347. False Statements #14 and 15 – This is false, and the RECORD contains no evidence to this effect.

348. False Statement #16 – William M. Windsor never ever followed Sean Boushie. There is no evidence to this effect in the RECORD.

349. False Statement #17 – There is no finding of fact or conclusion of law to indicate that anything William M. Windsor did in filing sworn petitions for protective order was frivolous, malicious, or vexatious. The facts in the petitions were totally accurate and they were based upon careful study of the law and were signed before notaries under penalty of perjury. William M. Windsor contends that Missoula County Montana Judge John W. Larson entered this order to try to hinder William M. Windsor in his efforts to expose Missoula County Montana Judge John W. Larson as the crook that William M. Windsor is confident he is.

350. Missoula County Montana Judge John W. Larson has intentionally made one false statement after another in the November 14, 2013 Order.

351. Missoula County Montana Judge John W. Larson entered an incredible order in which he issued filing restrictions against William M. Windsor with no justification whatsoever and without any due process. Missoula County Montana Judge John W. Larson is a corrupt judge, and this is what corrupt judges do to try to stop people who are actively working to expose them as the criminals that they are.

352. Judges are allegedly limited by the facts before them, and when a judge such as Missoula County Montana Judge John W. Larson invents facts, ignores his oath and duties, and issues outlandish

orders, the actions of the judge become criminal. William M. Windsor will ask a grand jury to file criminal charges against Missoula County Montana Judge John W. Larson.

353. This isn't a case of an incompetent judge. This is the case of a corrupt Judge John W. Larson of Missoula, Montana, who has committed the crimes of obstruction of justice, misprision of felonies, perjury, and more.

354. Judge John W. Larson of Missoula, Montana denied William M. Windsor any opportunity to appear before him, to testify, call witnesses, cross-examine Sean Boushie, or obtain the evidence that would prove to any honest person that Sean Boushie is a criminal and William M. Windsor is a victim. Of course it wouldn't have mattered because Judge John W. Larson is as corrupt as judges come in America. He very well may be the most corrupt state court judge in all 50 states. Judge John W. Larson has violated all of the laws regarding protective orders. Judge John W. Larson has violated a host of provisions of the Constitutions of both the United States and Montana. Judge John W. Larson has committed perjury and obstruction of justice by entering orders with many statements that he knows to be false. Judge John W. Larson violated his Code of Judicial Conduct and Oath of Office repeatedly. There probably isn't a thing that Judge John W. Larson has done in this case that is legal or ethical. Judge John W. Larson has committed fraud upon the court, obstruction of justice, has suborned perjury, has committed misprision of felonies, and has violated William M. Windsor's rights repeatedly. He is what William M. Windsor calls a scumbag. Judge John W. Larson of Missoula, Montana is one of the reasons we now live in Lawless America.

CONCLUSION

355. So, there you have it, five dastardly crimes. The true story here is that Bill Windsor has been filming a documentary, Lawless America, that exposes government, judicial, and law enforcement corruption. William M. Windsor named Montana the most corrupt state in America. Sean Boushie and Judge John W. Larson will be stars of the movie. Sean Boushie, who is apparently a paid government cyberstalker, is protected by law enforcement and the courts in Montana. This criminal action is an effort to destroy William M. Windsor and his movie. William M. Windsor is a senior citizen who has never been arrested and who has never committed a crime, not even a traffic ticket or parking ticket in 15 years.

356. Sean Boushie has threatened to kill or do bodily harm to William M. Windsor dozens of times. He attempted to kill him when he shot at him as William M. Windsor drove from Butte Montana to Missoula Montana to film a story for Lawless America...The Movie.

357. Sean Boushie has published over 600 comments online in a massive cyberstalking campaign against William M. Windsor. Sean Boushie became one of the members of the Joeyisalittlekid gang out of Ellis County Texas, a group of professional cyberstalkers and defamation artists.

358. There are many videos about Montana on www.YouTube.com/lawlessamerica, and the complete documentation of the criminal acts and wrongdoing of Sean Boushie are at www.SeanBoushie.com. Sean Boushie has threatened to kill others, and he was protected by law enforcement and the courts in Montana in those cases as well. William M. Windsor believes he is either paid by some government(s) to do this type of work, might be in a witness protection program that somehow allows him to get away with things like this, or he may have sexual blackmail on someone powerful in Montana. The sexual blackmail theory comes from the fact that a background search done on Sean Boushie revealed that the email address he used most often was missoulagloryholefun@yahoo.com. A "glory hole" is a hole in the divider wall between stalls in a public restroom where men have sex through the hole. One thing is for sure, Sean Boushie has committed crimes galore, and he is protected by the FBI, the Missoula Montana Police Department, the University of Montana Police Department, the Missoula County Sheriff's Department, the Ravalli County Sheriff's Department, the Missoula County District Attorney's Office, and the courts at all levels in Ravalli County, the City of Missoula, Missoula County, and the Montana Supreme Court.

359. The TOP was issued on August 23, 2013. That was over 500 days ago. There was never a hearing. It is a mere 480+ days too late for the hearing. The TOP expired. On August 14, 2014, William M. Windsor filed a Motion to Dismiss any attempt to obtain a protective order. That was over 150 days ago, and Judge John W. Larson never responded in any manner. [Exhibit 29 in the folder on the Flash Drive named Missoula Montana Criminal Charges is a true and correct copy of the Motion to Dismiss.]

PRAYER

360. William M. Windsor prays that Missoula County Montana Judge Karen Townsend quash the Bench Warrant and order all charges to be dropped.

361. William M. Windsor prays that the Bench Warrant be removed from any database that might cause other law enforcement authorities to act improperly on that Montana-only warrant.

362. William M. Windsor prays that Missoula County Montana Judge Karen Townsend find Tyler Dugger and Jennifer Clark in contempt for filing a false sworn pleading

363. William M. Windsor prays that Missoula County Montana Judge Karen Townsend issue a bench warrant for Tyler Dugger and Jennifer Clark for false swearing.

364. William M. Windsor prays that Missoula County Montana Judge Karen Townsend issue subpoenas so that the perjury and false swearing of Sean Boushie can be further proven.

365. William M. Windsor prays that Missoula County Montana Judge Karen Townsend order the Missoula County Attorney's Office to fully investigate the alleged crimes of Sean Boushie and Judge John W. Larson.

366. William M. Windsor asks Missoula County Montana Judge Karen Townsend to grant such other relief as the Court feels is appropriate.

Submitted this 16th day January, 2015,



William M. Windsor

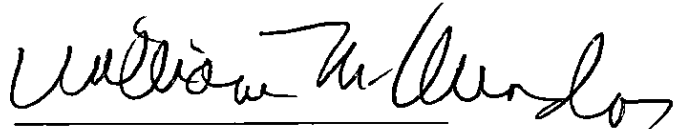
110 East Center Street #1213, Madison, SD 57042, 770-578-1094, email: WindsorInMontana@yahoo.com

VERIFICATION

Personally appeared before me, the undersigned Notary Public duly authorized to administer oaths, William M. Windsor, who after being duly sworn deposes and states that he is authorized to make this verification on behalf of himself and that the facts alleged in the foregoing are true and correct based upon his personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters he believes them to be true.

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

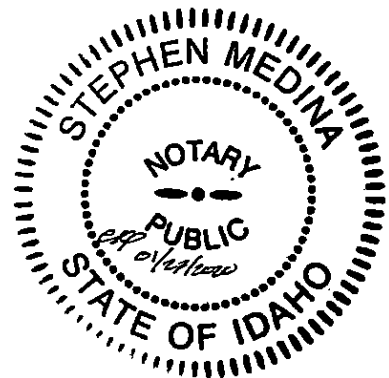
This 16 day of January, 2015.



William M. Windsor

Sworn and subscribed before me this 16 day of January, 2015.


Notary Public

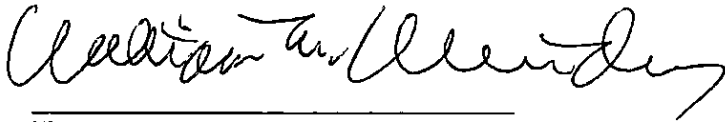


CERTIFICATE OF SERVICE

William M. Windsor has sent a copy of this VERIFIED MOTION TO QUASH by mail to the Missoula County Attorney, Kirsten Probst, Missoula County Courthouse, Fourth Floor in Courthouse Annex Building, 200 W Broadway, Missoula, MT 59802 and to Assistant Missoula County Attorney Jennifer Clark, Missoula County Courthouse, Fourth Floor in Courthouse Annex Building, 200 W Broadway, Missoula, MT 59802.

A copy of this MOTION TO QUASH has also been sent to the Montana Attorney General, the FBI, and the U.S. Department of Justice. It will be sent with the Judicial Misconduct Complaints that will be filed against each of the judges involved as well as with the Bar Complaints that will be filed against each attorney involved.

Submitted this 16th day January, 2015,

A handwritten signature in black ink, appearing to read 'William M. Windsor', written over a horizontal line.

William M. Windsor

110 East Center Street #1213, Madison, SD 57042, 770-578-1094, email: WindsorInMontana@yahoo.com

EXHIBIT

A