

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

William M. Windsor	§	
Plaintiff,	§	
v.	§	CASE NO. 13-311-M-ELC-JCL
Sean M. Boushie,	§	
Defendant	§	

NOTICE OF FILING OF AFFIDAVIT OF MARY WILSON
DATED JANUARY 30, 2014

Comes Now, William M. Windsor (“Windsor” or “Plaintiff”) and files this
NOTICE OF FILING OF AFFIDAVIT OF MARY WILSON DATED JANUARY
30, 2014.

1. THE AFFIDAVIT OF MARY WILSON DATED JANUARY 30,
2014 is attached as Exhibit A.

Submitted this 6th day of February, 2014,



William M. Windsor
PO Box 150325, Dallas, Texas 75315
Email: nobodies@att.net, Phone: 770-578-1094

CERTIFICATE OF COMPLIANCE

I hereby certify that this document is proportionately spaced, using
Times Roman typeface, 14 point.

Submitted this 6th day of February, 2014,

A handwritten signature in black ink, appearing to read "William M. Windsor". The signature is written in a cursive style with a horizontal line underneath it.

William M. Windsor, Appellant
PO Box 150325 * Dallas, TX 75315
Email: nobodies@att.net
Phone: 770-578-1094

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing NOTICE OF FILING OF
AFFIDAVIT OF MARY WILSON DATED JANUARY 30, 2014 to each

Defendant:

Sean M. Boushie
c/o Alison Garab
Sullivan, Tabaracci & Rhoades
1821 S Avenue West, Missoula, MT 59801
406-721-9700
email: alison@montanalawyer.com

University of Montana
c/o Office of Legal Counsel
University Hall 133. University of Montana. Missoula, MT 59812
406-243-4742 * fax: 406-243-2797
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Sean Boushie
Office of Legal Counsel
University of Montana. University Hall 133, University of Montana
Missoula, MT 59812
406-243-4742 * fax: 406-243-2797
email: claudia.eccles@mso.umt.edu

Submitted this 6th day of February, 2014,



William M. Windsor
PO Box 150325, Dallas, Texas 75315
Email: nobodies@att.net, Phone: 770-578-1094

Exhibit

A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

William M. Windsor)
Plaintiff,)

v.)

CASE NO. 13-311-M-ELC-JCL

Sean M. Boushie, University of)
Montana, John Does 1-100,)
Defendants)

AFFIDAVIT OF MARY WILSON DATED
JANUARY 30, 2014

I, Mary Wilson, the undersigned, hereby declare under penalty of perjury:

1. I am over the age of 21, am competent to testify, and have personal knowledge of the matters stated herein. I provide this affidavit to be used in any legal proceeding.
2. I have been a licensed registered nurse for (32) years.
3. I met William M. Windsor ("Mr. Windsor") when he came to Sacramento, California to film people for the documentary film that he is producing. Mr. Windsor filmed me and posted part of what he filmed on YouTube.
4. The injustice that I spoke about when I was filmed was based in the state of Montana.
5. I have never met and do not know Sean Boushie, but he began harassing me, threatening me, and stalking me online. He has threatened me in a manner that I consider to be death threats, and he has threatened my family.
6. In addition to published statements online, I received approximately (15) text messages from Sean Boushie with a photograph of a big knife and threats to me.
7. I believe he picked on me because I was from Montana, where he is from, and because I am very supportive of Mr. Windsor.
8. I have regularly read and posted on Mr. Windsor's Facebook pages from 2012 to the present. I saw and read the defamatory statements, obscene language, harassment, and threats posted in the name of Sean Boushie and various aliases on Facebook. I saw and read about threats to Mr. Windsor.
9. Posts in the name of Sean Boushie and aliases that he is believed to use were made attacking me.
10. A California Superior Court Judge and California Sheriffs witnessed Sean Boushie's threats with a big knife and fabrication that he had a warrant waiting for me in Montana. They saw these on my cell phone. They told me to have Sean Boushie served and they would set a hearing on an Order of Protection. They did not take screenshots of my cell phone text messages with the big knife because they did not want to pursue criminal stalking charges across state lines. They just told me to file a civil case against Sean Boushie for defamation and harassment in federal court.

11. I traveled to Missoula Montana to see a protective order against Sean Boushie. I filed my petition in Missoula Municipal Court on January 16, 2014.

12. At 2:00 pm on January 16, 2014, Missoula Municipal Court Clerk named Matt called me again to inform me that Judge Sam Warren denied the petition for a protective order against Sean Boushie stating electronic communications and screenshots are not proof that Boushie sent them and that it is very difficult to prove electronic communications. I informed him we have IP addresses that Boushie sent from.

13. The law in Montana is very clear on the grounds for a protective order, and I met the grounds so that a protective order should have been issued. There is no doubt in my mind whatsoever that Mr. Windsor should have been granted a protective order against Sean Boushie, just as I should have been. It appears to me that law enforcement and the courts in Montana are protecting Sean Boushie for some unknown reason.

14. Matt, the Missoula Municipal Court Clerk told me that Bill Windsor has been found to have fabricated electronic communications and purchased and fabricated domain pages against Boushie, that Bill Windsor is a vexatious litigant and that that case is in the Montana Supreme Court.

15. I informed Matt the Missoula Municipal Court Clerk that thousands across the country have witnessed the violent threats and death threats posted by Sean Boushie on Facebook, on www.LawlessAmerica.com, as well as other electronic communications to Mr. Windsor, his family, Crystal Cox, me, and some others.

16. I do not believe that Mr. Windsor ever fabricated electronic communications or purchased and fabricated domain pages against Sean Boushie. He assures me that he hasn't, and he says that forensic examination of the various postings, emails, and text messages will prove that Mr. Windsor is nothing but a victim here, as I am. I have seen the orders that were issued by the Missoula Municipal Court in Mr. Windsor's case, and there is no mention whatsoever of Mr. Windsor fabricating electronic communications or purchasing and fabricating domain pages against Sean Boushie. I was amazed that Missoula Municipal Court Clerk Matt would say such a thing to me.

17. From what I have seen published online, Sean Boushie has worked with a group called Joeyisalittlekid in Texas in the defamation, harassment and stalking of Mr. Windsor.

18. Like Mr. Windsor, I have been stalked, defamed and harassed by Joeyisalittlekid. I believe Sean Boushie and people with Joeyisalittlekid knowingly and willfully violated (HIPAA) laws by publishing my sensitive protected health information on the world wide web. They posted fraudulent, fictitious, false statements, defamation, libel and slander in a humiliating and intimidating manner. Defamation, profanity, lewd and lascivious statements with sexual assault were made against me. These included "She is a lesbian lover, a lot lizard, has sex with Crystal Cox and Bill Windsor, and she is infected with Herpes, Syphilis and spirokeets." I've been humiliated being called "TickBiteMary, a Lyme Brain, Munchausen's Mary, a psychopath, a looney bin, she requires arrest for a strip search and a body cavity search and she is a big nugget for a large injection of beetle dung," and other. "I hope she is homeless, penniless, and has to live in a cardboard box" with repeated threats with a big knife, with intimidation and aggravated assault, "Don't tell anyone about me, my employer, or anyone related to me, or I will get you locked up forever." They also published I should be locked up in the State Mental Hospital forever.

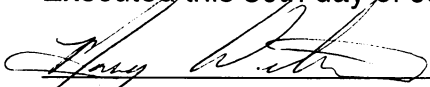
19. With use of veiled and vile threats with what I consider in a manner of death threats with repeated threats with a big knife causing deliberate infliction of emotional distress with harm, causing fear - interfering with my health, family and personal relationships, housing, professional college education, employment and community life. Further, with rights to claim with waste and abuse against federal agencies.

19. I reported the defamation, stalking, harassment and everything to the University of Montana Police Department. An officer named Nick Painter said "Are you a friend of Michael Spreadberry? He is crazy." I said, "I have never met Michael Spreadberry; I have only heard of him." Officer Nick Painter then said, "I have conflicts of interest; don't call back here again." So the University of Montana denied me the rights to make a police complaint against Sean Boushie. It seems to me that the University of Montana conspires with Sean Boushie to damage people like Mr. Windsor and myself.

FURTHER SAITH AFFIANT NOT.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of January 2014.



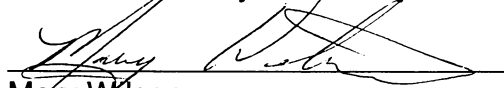
Mary Wilson

VERIFICATION

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


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

This 30th day of January 2014.



Mary Wilson

Sworn and subscribed before me this ^{4th} ~~30th~~ day of ^{February} ~~January~~ 2014.



Notary Public

