



Return copy

IN THE CIRCUIT COURT OF LAFAYETTE COUNTY, MISSOURI

Judge or Division: ONE	Case Number: 13LF-CV00461	
Plaintiff: William M. Windsor	Person subpoenaed: Wynette Boushie	Plaintiff's Attorney: Pro Se
	Address: 570 Grandview Drive Stevensville, MT 59870	Address: 514 America's Way #4841 Box Elder, SD 57719-7600
vs.		Telephone: 770-578-1094
Defendant: Allie L. Overstreet	Requesting Party: <input type="checkbox"/> Plt./Pet. Atty <input checked="" type="checkbox"/> Plt./Pet. <input type="checkbox"/> Def./Resp. Atty <input type="checkbox"/> Def./Resp.	Defendant's Attorney: Matthew O'Connor
	Address: (Of Party Checked Above) see above	Address: 521 Walnut St. Kansas City, MO 64106
	Telephone:	Telephone: 816-842-1111

(Date File Stamp)

Subpoena Order to Appear/Produce Documents/Give Depositions

The State of Missouri to Wynette Boushie you are commanded:

to contact _____ at _____ who will advise of time and place appearance is required.

to appear at Jeffries Court Reporting, 1015 Mount Avenue, Suite C, Missoula, MT 59801
on August 15th, 2013, at 9:00 AM.

to testify on behalf of:

to give depositions.

to bring the following All documents identified in Attachment.

(Seal)
8-1-13
Date Issued

Deana Overstreet
Clerk

Return/Affidavit

I certify that I served this subpoena in _____ County, Missouri by:

delivering a copy to the person subpoenaed on _____ (date).

reading a copy to the person subpoenaed on _____ (date).

I tendered legal fees for travel expenses per Section 491.130 RSMo in the amount of \$ _____.

Summons \$ _____

Non Est \$ _____

Mileage \$ _____ (_____ miles @ \$ _____ per mile)

Total \$ _____

Person serving Subpoena



Service copy

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 Non Est \$ _____
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_____ Person serving Subpoena

REQUEST FOR PRODUCTION OF DOCUMENTS TO
WYNETTE BOUSHIE

INSTRUCTIONS AND DEFINITIONS

- A. Each document request herein seeks all information available to Wynette Boushie, her attorneys or agents, her husband, and any other person acting on his behalf.
- B. If the original of a document is within your possession, custody or control, produce it; if not, produce such a copy of it as is in your possession, custody or control. Any copy of a document on which any notation, addition, alteration or change has been made is to be treated as constituting an additional original document.
- C. The term "document" is intended to have the broadest meaning permitted by law and specifically includes documents in written and electronic form, including but not limited to electronic mail, online messages, and online postings.
- D. For the purpose of responding, the term "you" and derivations of that pronoun shall refer to Wynette Boushie.
- E. For the purpose of responding, the term "Windsor" refers to William M. Windsor.
- F. For the purpose of responding, the term "Lawless America" refers to www.LawlessAmerica.com, www.LawlessAmerica.org, www.facebook.com/lawlessamerica, www.facebook.com/lawlessamerica2, www.youtube.com/lawlessamerica and the project of Windsor that these web pages cover.
- G. For the purpose of responding, the term "Overstreet" refers to Defendant Allie Loraine Yager Overstreet in Missouri Case # 13LF-CV00461.
- H. For the purpose of responding, the term "Mr. Boushie" refers to Sean Boushie, the husband of Wynette Boushie.
- I. Documents should be organized in folders or stacks with the document request number on the top.

DOCUMENT REQUESTS

1. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Windsor.
2. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Overstreet.
3. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Crystal Cox.
4. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Mary Wilson or Mary Deneen.
5. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Michael Spreadbury.
6. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Lea Anne Scott.
7. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Shawn Rutherford.
8. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Stephanie DeYoung.
9. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Paul Stramer.
10. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about Royce Engstrom.
11. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about anyone that you or your husband have ever said, written, or posted something negative.
12. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about anything that you or your husband have ever sent to anyone by any means or posted online containing vulgar words, cuss words, four-letter words, or anatomical terms, including but not limited to fuck, shit, dickless, ass, penis, butt.
13. All documents relating or referring to, or evidencing, reflecting, or constituting web pages of or about Windsor or Lawless America.
14. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about the police, sheriff's department, University of Montana Public Safety or Campus Security Department, any law enforcement agency, district attorney, or prosecuting attorney.
15. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, the University of Montana or any other entity or person about you or your husband allegedly stalking, harassing, defaming, libeling, slandering, cyberstalking, or threatening anyone.
16. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about any charges against you or your husband by any law enforcement agency, any arrests, and any convictions for violating the law.
17. All documents relating or referring to, or evidencing, reflecting, or constituting information about Windsor or Lawless America provided to you or your husband by anyone or obtained by you from any source.

18. All documents relating or referring to, or evidencing, reflecting, or constituting emails or online messages sent by you or your husband or received by you or your husband at home, at work, on a mobile device, or in any other manner in 2012 or 2013.

19. All documents relating or referring to, or evidencing, reflecting, or constituting accounts that you or your husband have ever set up with Facebook, Yahoo, Google, Lawless America, any email provider, or any website on which you have ever posted a comment.

20. All documents relating or referring to, or evidencing, reflecting, or constituting your drivers' license.

21. All documents relating or referring to, or evidencing, reflecting, or constituting your passport.

22. All documents relating or referring to, or evidencing, reflecting, or constituting licenses or permits for guns or weapons of any type.

23. All documents relating or referring to, or evidencing, reflecting, or constituting information about Mr. Boushie's participation in email, online messaging, and online posting.

24. All documents relating or referring to, or evidencing, reflecting, or constituting information about your husband's employment with the University of Montana, including but not limited to performance appraisals, contracts, personnel file information, compensation information.

25. All documents relating or referring to, or evidencing, reflecting, constituting, or showing telephone calls by you or your husband in 2012 and 2013.

26. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications between you or your husband and anyone regarding Windsor or Lawless America.

27. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications between you or your husband and all persons known to you or your husband who have knowledge of the facts and circumstances alleged in Overstreet's Complaint for Protective Order in Missouri Case # 13LF-CV00289.

28. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications that support Overstreet's claim that she was entitled to relief against Windsor as alleged in her Complaint for Protective Order in Missouri Case # 13LF-CV00289.

29. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications between you or your husband and each person with knowledge of you and Windsor or Lawless America.

30. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications with Windsor, including but not limited to, any and all telephone discussions with Windsor, notes or recordings of oral discussions with Windsor, emails, letters, faxes, or messages sent to or received.

31. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications between you or your husband and anyone to the effect that Windsor or Lawless America are dishonest, operate a "scam," are fraudulent, or are corrupt.

32. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications between you or your husband and Joeyisalittlekid.blogspot.com or anyone who posts on the Joeyisalittlekid.blogspot.com website.

33. All documents relating or referring to, or evidencing, reflecting, constituting, or showing communications, or any other form of publication or information between you or your husband and anyone regarding the American Mothers Political Party.

34. All documents relating or referring to, or evidencing, reflecting, constituting, or showing communications, information, messages, postings, articles, recordings, or any other form of publication or information to indicate that statements made by Windsor in the VERIFIED COMPLAINT in Missouri case # 13LF-CV00461 were false.

35. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about all the time you or your husband have spent in the state of Missouri, Kansas, or Texas from January 1, 2012 to the present.

36. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about a Facebook page pretending to be Windsor's deceased father.

37. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about a Facebook page pretending to be Windsor's deceased mother.

38. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about a Facebook page pretending to be Bill Windsor.

39. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about a Facebook page pretending to be Barbara or Babs Windsor.

40. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about Windsor as the victim of stalking, harassment, defamation, libel, slander, and threats.

41. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding threats that you have made to Windsor or Lawless America.

42. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding threats that you or your husband have made to anyone.

43. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, or any other form of publication, information, or communication made online in 2012 and 2013.

44. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication between anyone and you or your husband in which you use an alias, such as John Smith, John Brown, William Windsore, or any other name than your own.

45. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication between you or your husband and Claudine Dombrowski, Lorraine Tipton, Shannon Miller aka Elizabeth Hope Hernandez aka Shannon Hernandez, or anyone associates in any manner with the American Mothers Political Party.

46. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication that Windsor posted the death notice posting about Noah Williamson or that Windsor has ever posted knowingly false information.

47. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding any cease and desist notices published by Windsor in an attempt to stop you from making contact and defaming Windsor.

48. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor' published request for retractions from you or anyone else.

49. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding any litigation involving you or your husband now or at any time in the last 10 years.

50. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication that relates to police reports made by you or your husband.

51. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding any weapons that you or your husband own, including but not limited to, guns, knives, bows and arrows, explosives.

52. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, receipts, logs, or communication regarding your travel or your husband's travel from January 1, 2012 to the present.

53. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, telephone records, Internet records, recordings, or any other form of publication, information, receipts, logs, or communication regarding time that you or your husband have spent in Missouri, Kansas, or Texas from January 1, 2012 to the present.

54. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, telephone records, Internet records, recordings, or any other form of publication, information, receipts, logs, or communication to indicate that you or your husband are an experienced cyberstalker.

55. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, telephone records, Internet records, recordings, or any other form of publication, information, receipts, logs, or communication to indicate that you or your husband have conspired with Overstreet.