

CASE NO. _____

William M. Windsor	§	IN THE DISTRICT COURT
Petitioner,	§	
v.	§	
Sean Boushie,	§	
Respondent	§	RAVALLI COUNTY, MONTANA

**SECOND SWORN PETITION FOR TEMPORARY ORDER OF
PROTECTION AND REQUEST FOR HEARING FOR
A PERMANENT ORDER OF PROTECTION**

Comes Now, William M. Windsor (“Plaintiff”) and files this SWORN PETITION FOR TEMPORARY ORDER OF PROTECTION AND REQUEST FOR A HEARING FOR A PERMANENT ORDER OF PROTECTION (“SECOND SWORN PETITION”). PETITIONER shows the Court as follows:

1. PETITIONER applied for a Temporary Order of Protection in the Justice Court, but the petition was denied by Judge Bailey on bogus grounds.. PETITIONER meets all of the requirements of the statutes, and he must not be denied for no good reason or for erroneous reasons.

2. RESPONDENT SEAN BOUSHIE (“BOUSHIE” or “RESPONDENT”) is a serial cyber-stalker who has terrorized the PETITIONER and his family.

3. On August 6, 2013, the PETITIONER filed a SWORN PETITION FOR TEMPORARY ORDER OF PROTECTION AND REQUEST FOR A HEARING (“SWORN PETITION”) with the Justice Court. A true and correct copy of the SWORN PETITION is attached hereto as Exhibit 1 and incorporated herein.

4. Justice of the Peace Jim Bailey denied the SWORN PETITION claiming “(1) In order to grant a restraining order, the Court must find that the applicant is in imminent danger of harm. The information in your application did not meet that criteria. (2) If you have no relationship to the Respondent, then the Statutes require that you must be a victim of assault, stalking, incest, sexual assault, or sexual intercourse without your consent. The information provided in your application did not meet that criteria.” A true and correct copy of the AUGUST 6, 2013 ORDER is attached hereto as Exhibit 2 and incorporated herein.

5. Judge Bailey did not properly consider the evidence presented, so the PETITIONER is providing additional evidence to make it crystal clear that the PETITIONER meets the requirements of the statutes for a Temporary Order of Protection.

6. The PETITIONER verifies this SWORN PETITION before a notary under penalty of perjury stating that all facts contained herein are true and correct

based upon his personal knowledge, so this SWORN PETITION also serves as sworn testimony of the PETITIONER.

7. The PETITIONER badly needs this Court to issue a protective order.

**THE PETITIONER HAS MET THE REQUIREMENTS FOR
A TEMPORARY ORDER OF PROTECTION**

8. The PETITIONER has met the requirements for a temporary order of protection. Mont. Code Ann. § 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.**” [**emphasis added.**]

9. The PETITIONER has filed a SWORN PETITION in which he clearly stated that he is “in danger of harm if the court does not issue a Temporary Order of Protection immediately.” (SWORN PETITION, P. 1, No. 1.) In so doing, the PETITIONER met the only criteria required. Mont. Code Ann. § 40-15-201 simply provides that the petitioner shall file a sworn petition that states that the

petitioner is in reasonable apprehension of bodily injury. There are no other requirements once this is done. The only evidence before the Justice Court was the sworn testimony of the PETITIONER, and Judge Bailey had no basis to doubt the sworn testimony of the PETITIONER. In fact, the Justice Court was required to accept that everything that the PETITIONER has stated is true, and it is sworn under penalty of perjury before a notary.

10. In addition, the PETITIONER has filed a SWORN PETITION in which he has stated that he is a victim of several of the offenses listed in Mont. Code Ann. § 40-15-102. (SWORN PETITION, P. 3 No. 4, and P. 4 No. 5b.) So, the PETITIONER has more grounds than required for an order of protection.

11. Mont. Code Ann. § 40-15-102 provides: “(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....**” [**emphasis added.**] (The details of the Stalking offenses committed against the PETITIONER are provided in the

SWORN PETITION on pages 1-15 of the SWORN PETITION Addendum to 5B and in the Sworn Affidavit of William M. Windsor dated August 8, 2013, attached hereto as Exhibit 3 and incorporated herein. This Affidavit details over 100 instances of stalking and a dozen notices for the RESPONDENT to cease and desist in 128 exhibits. The details of the Assault offenses committed against the PETITIONER are provided in the SWORN PETITION on pages 16-17 of the SWORN PETITION Addendum to 5B. The details of the Aggravated Assault offenses committed against the PETITIONER are provided in the SWORN PETITION on pages 18-19 of the SWORN PETITION Addendum to 5B.)

**THE PETITIONER HAS ESTABLISHED A PRIMA FACIE CASE BY
STATUTE, SO THIS COURT HAS NO OPTION; THIS COURT MUST
ISSUE A TEMPORARY ORDER OF PROTECTION**

12. Since there is no evidence to the contrary and the only person in the world who can say whether or not he is in fear for his safety is the PETITIONER, this Court may not accept anything else as fact in making a prima facie decision.

Once the accused has received actual notice that the stalked person does not want to be contacted or followed, any further attempts by the accused to contact or follow that person constitute prima facie evidence that the accused purposely or knowingly followed, harassed, threatened, or intimidated the

stalked person. Section 45-5-220(6), MCA. (*State v. Yuhas*, 2010 MT 223 (Mont. 10/26/2010).)

13. The PETITIONER has provided true and correct copies of cease and desist notices that he sent to the RESPONDENT. (See AFFIDAVIT, ¶¶ 5, 32, 42, 49, 53, 56, 63, and 65.) The PETITIONER has provided proof that the RESPONDENT acknowledged receipt of those cease and desist notices. (See AFFIDAVIT, ¶¶ 11, 66.) And the PETITIONER has provided dozens of contacts after the cease and desist notices. (See AFFIDAVIT, ¶¶ 6-128.) True and correct copies of this evidence is attached hereto.

14. That the PETITIONER is a victim of Stalking is easily proven because Mont. Code Ann. § 45-5-220 (6) provides that the continued harassment, threats, and intimidation by BOUSHIE after being notified to stop is prima facie evidence of stalking. AFFIDAVIT Exhibits 2, 14, 15, 19, 22, 28, 31, 33, 44, 49, 54, 63, 65, 67, 75, 78, 82, 84, 88, 89, 91, 92, 93, 99, 100, 107, 123, and 128 are some of the most significant evidence of the stalking. Exhibits 29, 39, 46, 50, 53, 60, and 62 are some of the cease and desist notices sent to BOUSHIE by the PETITIONER notifying BOUSHIE to stop. 123 of the exhibits for stalking came after the first cease and desist notice. Exhibits 11 and 66 are examples where BOUSHIE admits receiving the cease and desist notices.

15. This Court must, therefore, grant the SECOND SWORN PETITION because the PETITIONER has met yet another of the individual criteria needed for the issuance of such an order, and this one is mandatory. This Court does not have any discretion when the prima facie case has been established by statute.

16. Mont. Code Ann. § 40-15-201 provides: “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.” (*Coogler v. Coogler*, 321 Mont. 243, 90 P.3d 414, 2004 MT 122 (Mont. 05/06/2004).) Montana courts have accepted that the harm may be merely emotional. (*T.A.S. v. J.J.H.*, 2009 MT 429 (Mont. 12/18/2009).)

17. The PETITIONER has made it clear that he is suffering emotional distress and that he fears for his safety. The RESPONDENT claims he shot at the PETITIONER on August 4, 2013. The SWORN PETITION contains massive evidence of what has been done to the PETITIONER and his family and that he is suffering emotional distress.

THE PURPOSE OF PROTECTION FROM STALKING

18. The purpose of protection from stalking is to PROTECT people from others.

“...the statute serves a plainly legitimate purpose — to discourage the repeated, intentional, harmful conduct which constitutes stalking.” (*State v. Martel*, 902 P.2d 14, 273 Mont. 143 (Mont. 08/24/1995).)

As the statutes taken together establish, the object of a TOP proceeding is the swift and efficient protection of one who is being harassed and intimidated by another. (*Lear v. Jamrogowicz*, DA 12-0523 (Mont. 06/04/2013).)

A TOP is intended to protect victims from the danger of harm at the hands of an assaultive person or stalker. (*Lear v. Jamrogowicz*, DA 12-0523 (Mont. 06/04/2013).)

19. SEAN BOUSHIE has knowingly attempted to place the PETITIONER in fear of physical harm; he has associated with others who have threatened or implied the desire to commit physical harm to the PETITIONER; has harassed the PETITIONER; has engaged in a purposeful course of conduct involving more than one incident that alarms or causes distress to the PETITIONER and serves no legitimate purpose; has followed the PETITIONER in public places online; has stalked the PETITIONER; has purposely and repeatedly engaged in an unwanted course of conduct that causes alarm to the PETITIONER when it is reasonable in the PETITIONER’S situation to have been alarmed by the conduct; has caused the PETITIONER to fear of danger of physical harm; has

committed a pattern of conduct composed of repeated acts over a period of time that serves no legitimate purpose; has sent the PETITIONER unwanted communication; has made unwanted contact; and has been a major cause of the PETITIONER'S loss of his marriage, his children, and his grandchildren.

THE PETITIONER IS A VICTIM OF STALKING

20. The PETITIONER is clearly a victim of stalking. The PETITIONER can provide this Court with a flash drive made by the PETITIONER containing approximately 15 gigabytes of evidence of stalking, defamation, harassment, threats, and more that the PETITIONER has obtained and kept on a hard drive.

21. Mont. Code Ann. § 45-5-220 - Stalking provides:

(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 phone, by mail, or by other action, device, or method. [emphasis added.]**

22. The terms in Mont. Code Ann. § 45-5-220 have been defined by the Montana courts.

“Words such as ‘repeatedly,’ ‘harassing,’ and ‘intimidating’ have commonly understood meanings. ‘Repeatedly’ means ‘more than once.’ ‘Intimidate’ means ‘to make timid; to frighten.’ ‘Harass’ means ‘to annoy repeatedly.’

Webster's Collegiate Dictionary, (10th Ed. 1993).” (*State v. Martel*, 902 P.2d 14, 273 Mont. 143 (Mont. 08/24/1995).) (See also *State v. Yuhas*, 2010 MT 223 (Mont. 10/26/2010).) Stalking is defined: “...repeated harassment, threatening or intimidation of the stalked person.” (*Edelen v. Bonamarte*, 162 P.3d 847, 337 Mont. 407, 2007 MT 138 (Mont. 06/12/2007).)

23. So, stalking is making someone timid or frightening someone or annoying someone repeatedly, and there must be more than one such occurrence.

“Stalking is the act or crime of willfully and repeatedly following or harassing another person. Stalking occurs in circumstances that seriously alarm, annoy, intimidate or causes a reasonable person to fear injury or death because of express or implied threats.” (*Missoula County Crime Victim Advocates Office* website, 8-6-2013.)

24. The PETITIONER has provided over 100 documented instances of stalking (AFFIDAVIT), and he has stated that this activity by BOUSHIE has frightened him and annoyed him. Any reasonable person would feel the same way as the PETITIONER.

The standard to be employed when construing the statute is that of the "reasonable person." When faced with the conduct complained of, would a reasonable person feel apprehension or substantial emotional distress? (*State v. Martel*, 902 P.2d 14, 273 Mont. 143 (Mont. 08/24/1995).)

25. The PETITIONER has been caused substantial emotional distress.

“Further, the term ‘substantial emotional distress’ has been examined by this Court within the context of the tort of intentional infliction of emotional distress. *First Bank-Billings v. Clark* (1989), 236 Mont. 195, 771 P.2d 84. We found that the reasonable person standard was the most appropriate way of quantifying an abstract concept such as emotional distress. Such a standard is equally applicable here, and may be inferred from the language

of the stalking statute.” (*State v. Martel*, 902 P.2d 14, 273 Mont. 143 (Mont. 08/24/1995).)

Whether a stalked person has suffered substantial emotional distress is determined by a reasonable person standard - whether, when faced with the same conduct, a reasonable person would experience substantial emotional distress. (*State v. Martel*, 273 Mont. 143, 150, 902 P.2d 14, 19 (1995).)

A stalked person need not manifest physical symptoms in order to establish substantial emotional distress. *Id.* at 152, 902 P.2d at 20 (holding that a stalked person's becoming frustrated, upset, angry, and scared constituted substantial emotional distress). (*State v. Yuhas*, 2010 MT 223 (Mont. 10/26/2010).)

26. All that is necessary in Montana to meet “substantial emotional distress” is to say that you are scared and intimidated. Recent case law has recognized emotional distress in cases without physical injury or contact.

“The record before us contains sufficient evidence that B.T. suffered substantial emotional distress. B.T. described himself as being "really scared and intimidated" after Yuhas appeared at the football practices and bonfire.” (*State v. Yuhas*, 2010 MT 223 (Mont. 10/26/2010).)

27. The PETITIONER stated this clearly in the SWORN PETITION: “I am experiencing substantial emotional distress AND reasonable apprehension of bodily injury or death...” (SWORN PETITION, Addendum to 5B, P. 2 ¶2.) “I fear for my safety and the safety of my family. I am in fear of bodily harm to myself and my family, violent injury to my property, and more.” (SWORN PETITION, Addendum to 5B, P. 8 ¶2.) “I do these things because I fear for my safety.”

(SWORN PETITION, Addendum to 5B, P. 9 ¶2.) “Any reasonable person in possession of this information would regard it as sufficient to cause another person reasonable distress.” (SWORN PETITION, Addendum to 5B, P. 11 ¶6.)

28. Montana courts have established that something as innocent as attending three football events meets the requirements for stalking. Needless to say, that is nothing compared to what the PETITIONER endures.

“Yuhas's actions clearly occurred more than once: He appeared at two football practices and the homecoming bonfire over a two day period. Therefore, the stalking statute's requirement that the acts occur repeatedly is satisfied. *State v. Martel*, 273 Mont. 143, at 150, 902 P.2d at 19.” (*State v. Yuhas*, 2010 MT 223 (Mont. 10/26/2010).)

29. Montana courts say conduct such as shouting and throwing debris constitute stalking. Needless to say, the PETITIONER endures far worse.

“The District Court concluded that Stambaugh's conduct, including ‘threats, shouting, throwing canine feces and other debris onto [the Kendalls'] property, as well as other verbal threats that would reasonably cause [the Kendalls] fear of harm,’ justified an order of protection for stalking (§ 45-5-220, MCA). The District Court entered a permanent order of protection under § 40-15-204, MCA....” (*Robert Kendall and Julie Kendall v. Charles David Stambaugh*, 2012 MT 64N (Mont. 03/13/2012).)

30. The PETITIONER is a stalking victim.

31. The only evidence before this Court is that the PETITIONER is a stalking victim.

32. The statute doesn't say that it requires that a Court decide if a person is in reasonable fear for his safety; the law requires that the person says he is in reasonable fear for his safety and/or his family's safety.

33. The PETITIONER said in the SWORN PETITION: "I fear for my safety. My family is terrorized." The PETITIONER repeats this statement of fact. The PETITIONER is in reasonable fear for his safety. The PETITIONER'S family is in so much fear that they will no longer be around the PETITIONER, and the PETITIONER no longer has contact with his children and grandchildren as a result. The PETITIONER fears for the safety of his family. BOUSHIE has even published the PETITIONER'S ex-wife's home address as his own with a photo of a big knife on Facebook.

CYBER-STALKING IS STALKING BASED UPON THE DEFINITION
IN THE MONTANA STATUTES

34. This Court must properly consider cyber-stalking. Cyber-stalking is clearly recognized as a significant form of stalking.

35. The internet has enabled online groups of often-anonymous people to self-organize to target individuals with online defamation, threats of violence and technology-based attacks. These include publishing lies and doctored photographs, threats of rape and other violence, posting sensitive personal information about

victims, e-mailing damaging statements about victims to their employers, and manipulating search engines to make damaging material about the victim more prominent. Experts attribute the destructive nature of anonymous online mobs to group dynamics, saying that groups with homogeneous views tend to become more extreme as members reinforce each other's beliefs, they fail to see themselves as individuals, so they lose a sense of personal responsibility for their destructive acts, they dehumanize their victims, which makes them more willing to behave destructively, and they become more aggressive when they believe they are supported by authority figures. This is being done to the PETITIONER, and more.

36. There is absolutely no question that the RESPONDENT and his associates have followed the PETITIONER online and contacted the PETITIONER online for the purpose of harassing and intimidating the PETITIONER. They have attempted to terrify, threaten, harass, annoy, and offend the PETITIONER with lewd and profane language, lewd and lascivious acts, threats to inflict physical harm, and more.

37. Virtually all of the stalking and harassment has been cyber-stalking, the use of the Internet and email to stalk and harass the PETITIONER and those acquainted with the PETITIONER.

38. The stalking includes the making of false accusations and false statements. These include that the PETITIONER is a pedophile, a pedophile lover, anti-gay, bigoted, a criminal operating a scam, and much more.

39. The stalking includes monitoring, as the stalkers claim to be tracking the PETITIONER's Internet activity. The RESPONDENT and some of his associates participate in the PETITIONER's online radio talk shows to monitor and/or to disrupt the calls and the online chat. The monitoring includes repeated online posts of libelous, threatening, harassing statements.

40. The stalking includes threats.

41. The libel and slander is truly unbelievable. These stalkers invent one false claim after another. People who the PETITIONER doesn't know make statements in writing that have no truth whatsoever and can be easily proven to be false. It's like they feel they can say anything and get away with it.

42. The stalkers have repeatedly violated the PETITIONER's privacy rights and copyright by using photos and videos of the PETITIONER that they have no legal right to use. Photographs of the PETITIONER have been doctored. Absolutely sickening videos have been produced about the PETITIONER.

43. The threat from cyber-stalking is actually much greater than the threat when a man threatens a woman with physical harm. In the cyber-stalking that the

PETITIONER must endure every second of every day, the stalking is from many people -- a gang of cyber-stalkers. The PETITIONER believes as many as 1,000 people could be involved, and he has identified the names of over 500 who he knows or strongly believes to be involved in cyber-stalking him in some manner. The RESPONDENT is a leader in this gang stalking.

44. Any one of these people could do physical harm to the PETITIONER or his family, and all who participate make it just that much more likely that the PETITIONER or his family will be harmed. Because they publish outlandish lies and defamation about the PETITIONER, a person who hates pedophiles could attack the PETITIONER because publications on the Internet and websites set up such as “Bill-Windsor-is-a-pedophile” may cause pedophile haters to believe the PETITIONER is a pedophile. It is well-known that in prison, the inmates generally hate pedophiles and will hurt them.

45. The PETITIONER has been falsely and maliciously branded in all types of horrendous ways in publications that have reached millions all over the world: pedophile, pedophile lover, bigot, anti-gay, sexual deviant, terrorist, person who has sex with animals, con man, criminal, and much more. The RESPONDENT has published, among other things that the PETITIONER has

herpes and that he is a liar, mentally disturbed, a sociopath, a pedophile, a lesbian, a fraud, a con man, going to jail, unfaithful to his wife, and is operating a scam,

46. The PETITIONER has provided extensive documentation of the course of conduct as Exhibits hereto. The cyber-stalking has been regular for at least 18 months. There are currently dozens of websites and hundreds of published articles set up to cyber-stalk and threaten the PETITIONER. The RESPONDENT and others have taken special efforts to ensure that these websites and defamatory publications rank high in Internet searches. These websites contain published statements that the PETITIONER is a terrorist, pedophile, stalker, abuser, sexual predator, sexual pervert, has no balls, only happy when sucking hard cock, cock sucker, sexual deviant, has a tiny penis, and more.

47. The PETITIONER was not a gun owner before this happened to him, but now he owns a gun. Because he does not yet have a carry permit, and because he travels all over the country, carrying a gun for protection is legally problematic. So, the PETITIONER bought pepper spray, a little buzzer-like stun gun, a portable alarm, a dashcam, and a Louisville Slugger baseball bat. The PETITIONER is wearing a bulletproof vest everywhere he goes while in Montana. The pepper spray, stun gun, and portable alarm go everywhere the PETITIONER goes except courthouses, police stations, and other places where these items are prohibited.

The baseball bat and dashcam remain in the PETITIONER'S Jeep at all times. The PETITIONER keeps his doors locked at all times, consciously tries to always park under a light, sits with his back to the wall so he can see an entire room, walks briskly, and considers that anyone approaching could be a danger. The PETITIONER can no longer publish where he will be working because cyber-stalkers have threatened to come and hurt him. The PETITIONER is attempting to keep the location of his new residence a secret so stalkers will not come and harm him and terrorize him as some have published they will do. The PETITIONER heaves a sigh of relief every time he turns on his car and it doesn't blow up. On two occasions, the PETITIONER has come to his car in the morning in a hotel parking lot to find the motor running, the air conditioning on high, and the car locked with the only key in the PETITIONER'S pocket.

48. The PETITIONER does these things because he fears for his safety.

49. The PETITIONER'S family is terrorized by the cyber-stalking and threats. The PETITIONER and his wife rarely ever had a relationship problem in 42 years together, but the PETITIONER'S wife divorced him solely because she is absolutely terrorized. The PETITIONER'S adult children are very afraid. The PETITIONER'S daughter will not allow the PETITIONER to have any communication with his two precious granddaughters who he loves more than

words could ever express. When the PETITIONER'S wife announced she was divorcing him, she specifically stated that she was doing it in hopes that she could distance herself from the cyber-stalkers and threats, specifically SEAN BOUSHIE.

THE SPECIFIC THREATS

50. The PETITIONER has received many threats, some explicit and some veiled. (See AFFIDAVIT, ¶¶ 3, 4, 18, 19, 21, 25, 36, 57, 68, 70, 78, 81, 85, 91, 92, 94, 95, 102, 103, 110, 126, and 131.)

51. BOUSHIE recently claimed that he took a shot at the PETITIONER on the Interstate as HE was driving from Billings to Missoula [AFFIDAVIT, Exhibit 128.]

52. One of BOUSHIE'S associates, Curtis Butler, has recorded a YouTube video in which he threatens to track the PETITIONER down wherever he moves and do bodily harm to him. In the video, Butler admits that he is an alcoholic, and he is drinking Everclear straight from the bottle. Those who know what to look for indicate that he shows signs of being on meth. Curtis Butler is extremely frightening. No one in their right mind would record a video saying they were going to kill someone, but he did. Curtis Butler is absolutely someone who could do physical harm to the PETITIONER.

53. BOUSHIE has repeatedly threatened to hurt and kill the PETITIONER. (See AFFIDAVIT, ¶¶ 3, 4, 18, 19, 21, 25, 36, 57, 68, 70, 78, 81, 85, 91, 92, 94, 95, 102, 103, 110, 126, and 131.) He has used Charles Manson as his photo, a huge knife, and a Glock gun. He has threatened to shoot the PETITIONER. He says that when the PETITIONER comes to Missoula Montana, a bulletproof vest won't do any good, implying he will go for a headshot.

54. Another of BOUSHIE'S associates, Brannon Bridge, has published several videos in which he indicates he plans to beat the PETITIONER with a hammer. In another video, he is seen sticking pins into a Bill Windsor doll.

55. Another of BOUSHIE'S associates, Allie Overstreet, swore in a petition for a protective order in Missouri that the PETITIONER had repeatedly published that he had bought a gun and planned to kill a large group of people, including her. She filed a police report at the same time making this charge and dozens of absolutely false claims. The purpose of this was to try to get the PETITIONER sent to prison. This threat was very real as the PETITIONER had to travel from his home in Georgia to Lafayette County Missouri to stand trial for being a would-be serial killer and/or mass murderer.

56. Another woman, Shannon E. Miller, has apparently filed a similar complaint with the Biloxi Mississippi Police Department.

57. The very real threat that some law enforcement agency will act against the PETITIONER is very real, even though the PETITIONER has not committed any crimes, has never been arrested or charged with a crime, and doesn't even have a traffic ticket or parking ticket in over 12 years.

58. Another group of BOUSHIE'S associates publish one defamatory article after another at <http://joeyisalittlekid.blogspot.com>. This website recently published an article with a reward if someone did bodily harm to the PETITIONER while he was in Texas, and double the reward if the PETITIONER was sent to the morgue.

59. Lord only knows how many threats have been published online. The PETITIONER anticipates that it would take at least one full-time person just to keep up with what is published and the comments that people make. The PETITIONER fears that there are far more threats that he doesn't know about.

60. The PETITIONER's name has been misappropriated as has the name of his deceased parents. The PETITIONER's photos and intellectual property have been misappropriated many times. Photos taken from the PETITIONER'S father's tribute website include him in his death bed and in his coffin at the funeral home. Another page shows what is allegedly his skeleton, and another page has a photo of him on his death bed allegedly having phone sex with his deceased wife, the

PETITIONER'S mother.] A Facebook site set up in the name of the PETITIONER'S deceased mother shows what is allegedly her skeleton bones wearing a wig.

61. BOUSHIE and his associates have publicly disclosed private facts about the PETITIONER, and totally false personal information has been publicly disclosed. Facts disclosed include alleged sex life, alleged criminal activity, alleged failure to pay taxes, alleged pedophilia, and much more.

62. There is an absolutely false article on Business Week's website posted by an associate of BOUSHIE that claims the PETITIONER is a sexual deviant and a terrorist.

63. The PETITIONER's personal photos, photos of family members, as well as photos and alleged photos of his family have been published to damage the PETITIONER and in violation of his privacy and intellectual property rights. The matters publicized would be offensive to a reasonable person. The disclosures have humiliated the PETITIONER and caused severe emotional distress.

BOUSHIE HAS COMMITTED MANY VIOLATIONS

OF MONTANA CRIMINAL STATUTES

64. BOUSHIE has committed many counts of violations of these Montana criminal statutes: 45-5-220 (Addendum to SWORN PETITION 5B, P, 1, 45-5-201

(Addendum to SWORN PETITION 5B, P. 20), 45-5-202 (Addendum to SWORN PETITION 5B, P. 21), 45-6-332 (Addendum to SWORN PETITION 5B, P. 20), 45-8-21 (Addendum to SWORN PETITION 5B, P. 21), 45-8-220 (Addendum to SWORN PETITION 5B, P. 22), 45-5-213 (Addendum to SWORN PETITION 5B, P. 23), 45-5-208 (Addendum to SWORN PETITION 5B, P. 24), 45-5-203 (Addendum to SWORN PETITION 5B, P. 25).

65. Orders of protection are supposed to protect victims from the criminals. The PETITIONER is a victim who needs protection.

THE ACTIVITY THAT MAY BREED A KILLER

66. The threats to the PETITIONER are not just from specific threats to do harm or veiled death threats, they are also from all the defamatory, malicious, complete fabrications of criminal activity statements published all over the Internet.

67. Thus far, the PETITIONER has identified over 32 websites set up specifically to defame him and incite people who read the sites, and many other websites that are used for the same purposes. These sites include the following:

- a. <http://i-am-a-pedophile-william-windsor.blogspot.com>
- b. <http://williamwindsor-sexualpredator.blogspot.com/>
- c. <http://william--windsor.blogspot.com/>

- d. <http://i-am-a-pedophile-william-windsor.blogspot.com/>
- e. <http://tiny-penis-bill-windsor.blogspot.com/>
- f. <http://terrorist-billwindsor-lawlessamerica.blogspot.com/>
- g. <http://stalker-williamwindsor.blogspot.com/>
- h. <http://lawlessamerica-domesticterrorist.blogspot.com/>
- i. <http://lawlessamerica-cult.blogspot.com/>
- j. <http://i-suck-dick-bill-windsor.blogspot.com/>
- k. <http://i-have-no-balls-bill-windsor.blogspot.com/>
- l. <http://sexual-pervert-bill-windsor.blogspot.com/>
- m. <http://pedophile-bill-windsor.blogspot.com/>
- n. <http://bill--windsor.blogspot.com/>
- o. <http://bill-windsor.blogspot.com/>
- p. <http://bill-windsor-sexual-deviant.blogspot.com/>
- q. <http://www.facebook.com/uglyamericanz>
- r. <http://www.facebook.com/babs.windsor.35>
- s. <http://www.facebook.com/barbara.windsor.134>
- t. <http://www.facebook.com/billwindsor.files>
- u. <http://www.facebook.com/billwindsore>
- v. <http://www.facebook.com/bill.windsor.33>
- w. <http://www.facebook.com/ceaseanddesistbillwindsor>
- x. <http://www.facebook.com/pages.exposing-bill-windsor>
- y. <http://www.facebook.com/pages/lawless-america-is-a-fraud>
- z. <http://www.facebook.com/pages-lawless-america-the-movie-scam>
- aa. <http://www.facebook.com/lawlessisascam>
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68. The PETITIONER fears that an unbalanced person reading some of this information may well provide the biggest threat. The PETITIONER fears injury or death from someone that he doesn't even know who has been incited by the unbelievable claims, comparisons to Hitler, and assertion after assertion that the PETITIONER sexually abuses children.

THE PETITIONER NEEDS PROTECTION

WHEREFORE, PETITIONER prays that this Court enter an order granting the SECOND SWORN PETITION FOR TEMPORARY ORDER OF PROTECTION AND REQUEST FOR A HEARING FOR A PERMANENT ORDER OF PROTECTION; and order the protection requested in the SWORN PETITION.

Submitted this 9th day of August, 2013,

William M. Windsor

514 America's Way #4841, Box Elder, SD 57719-7600

Email: nobodies@att.net, Phone: 770-578-1094

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 SECOND SWORN PETITION FOR TEMPORARY ORDER OF PROTECTION AND REQUEST FOR A HEARING FOR A PERMANENT ORDER OF PROTECTION 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 9th day of August 2013.

Sworn and subscribed before me this 9th day of August.

Notary Public