SWORN PETITION FOR TEMPORARY ORDER OF PROTECTION

William M. Windsor v. Sean Boushie

5. PAST ABUSE

and

4. Relationship. Victim of:

Mont. Code Ann. § 45-5-220. Stalking.

- (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) <u>harassing</u>, threatening, or intimidating the stalked person, in person or by phone, by mail, or by other action, device, or method.
- (2) This section does not apply to a constitutionally protected activity.
- (3) For the first offense, a person convicted of stalking shall be imprisoned in the county jail for a term not to exceed 1 year or fined an amount not to exceed \$1,000, or both. For a second or subsequent offense or for a first offense against a victim who was under the protection of a restraining order directed at the offender, the offender shall be imprisoned in the state prison for a term not to exceed 5 years or fined an amount not to exceed \$10,000, or both. A person convicted of stalking may be sentenced to pay all medical, counseling, and other costs incurred by or on behalf of the victim as a result of the offense.
- (4) Upon presentation of credible evidence of violation of this section, an order may be granted, as set forth in Title 40, chapter 15, restraining a person from engaging in the activity described in subsection (1).
- (5) For the purpose of determining the number of convictions under this section, "conviction" means:
- (a) a conviction, as defined in 45-2-101, in this state;
- (b) a conviction for a violation of a statute similar to this section in another state; or
- (c) a forfeiture of bail or collateral deposited to secure the defendant's appearance in court in this state or another state for a violation of a statute similar to this section, which forfeiture has not been vacated.
- (6) Attempts by the accused person to contact or follow the stalked person after the accused person has been given actual notice that the stalked person does not want to be contacted or followed constitutes prima facie evidence that the accused person purposely or knowingly followed, harassed, threatened, or intimidated the stalked person.

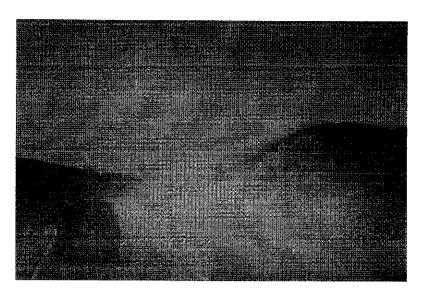
As of July 21, 2013, there were 109 counts of the Stalking law that I identified on the website that I set up to document all of this – www.SeanBoushie.com. There have been several since,

with the latest on August 4, 2013. The easiest way to see them is click on this link and review them on the website that I set up to document all of this: http://seanboushie.com/?cat=98

I am experiencing substantial emotional distress AND reasonable apprehension of bodily injury or death because Sean Boushie has repeatedly harassed, threatened, and intimidated me by mail, electronic communication, as defined in <u>45-8-213</u>, including email, mail, and online postings. There are OVER 100 instances that I have identified and documented.

Sean Boushie has made many threats that I consider to be threats to kill me.

On August 4, 2013, I drove to Missoula from Billings. During that drive, a car in the lane to my right and just ahead of me burst into flames and a cloud of smoke billowed out, completely obscuring the roadway and the other vehicles. I grabbed my camera and was able to snap a couple of photos after I had slowed.



The smoking car is in the right lane in the photo above and cannot be seen for all the smoke. Because of the death threats that I have received, I didn't stop, though I believe the car in front of me did.

I posted news of this on my Facebook page. Then at 9:03 pm, I received this email from Sean Boushie in which he claims he shot the car to my right while trying to shoot me. Note: Lately, he uses my name with an e on the end as his alias when he emails me:

From: William Windsore [mailto:billwindsore@yahoo.com]

Sent: Sunday, August 04, 2013 9:03 PM

To: nobodies@att.net

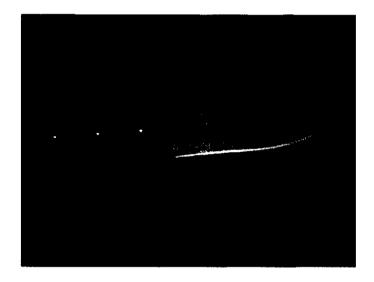
Subject: [Bulk]

Here 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.

Sean Boushie's original posts on my Facebook page used a Glock gun in place of his photo:



Then he changed to a big knife:



Then the Sean Boushie Facebook page began using the photo of mass murderer Charles Manson:



Sean Boushie

Sean Boushie has threatened to shoot me. He says that when I come to Missoula Montana, a bulletproof vest won't do any good, implying he will go for a headshot.

From: William Windsore [mailto:billwindsore@yahoo.com]

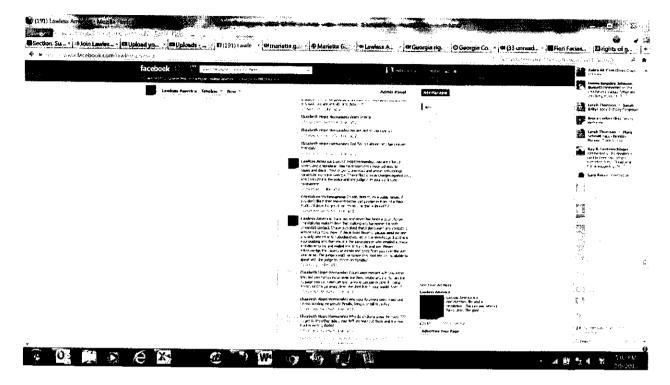
Sent: Saturday, June 29, 2013 8:40 AM

To: nobodies@att.net

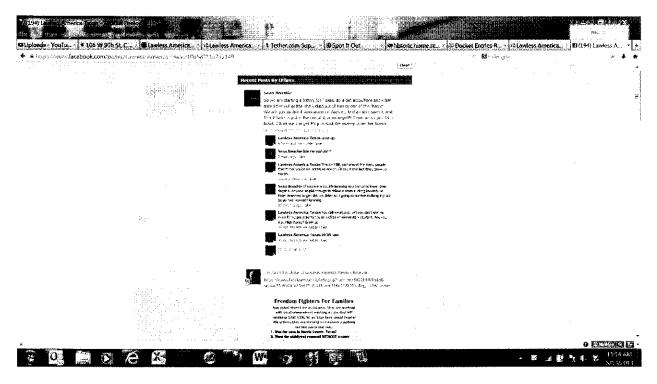
Subject: [Bulk]

So when is the showdown you fat douchbag? We don't wantto miss your blubber butt getting handcuffed and yur face getting ground into the dirt. I hear they have some gay aids infested transients for your cell mates, better bring lube big boy. Sorry, we forgot you are a lying puss, you don't have the testicular fortitude to stand up to a real man. You only stalk innocent women in the dark. Make sure that new vest is on tight, you will need it. It won't do you any good btw. See ya wuss. Why don't you send a few thousand more emails dumbass.

In this online posting, Scan Boushie threatens to run over me with a Mack Truck:



Sean Boushie posted online that he had set up a reward if I was assaulted with a bonus if I was killed before I left Texas:



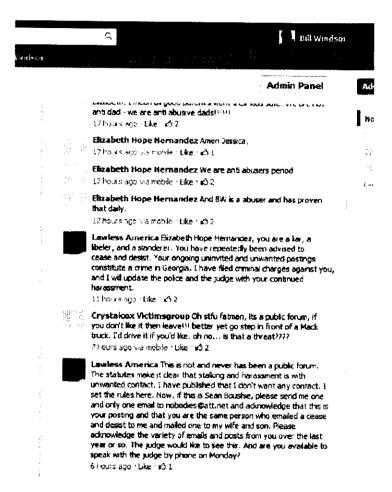
When I left Texas alive, he changed the reward.

In this email, he threatens to shoot me in Montana:

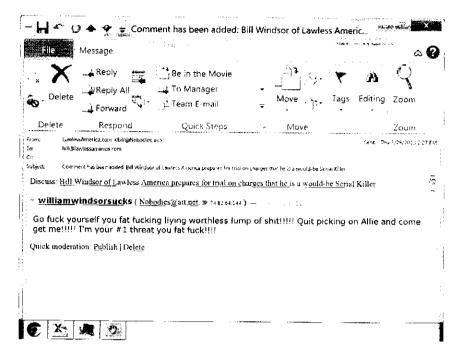
Discuss: <u>Bill Windsor has been attacked by Shannon E. Miller, the American Mothers Political Party, Facebook, and More</u>

Sean Boushie (seanboushie@gmail.com, IP: 74.82.64.160) — 2013-01-03.00:16
You are so welcome fatass!!!!!! :P. Anytime you grow a pair and want to take off your little girl panties you just bring that new gun you are bragging about right over. Ill give you an in depth lesson in montana castle doctrine. Until then tell your wife and son to expect my lawsuit. And you, you can go fuck yourself.

In this published message on Facebook, he talks about me being run over by a Mack Truck, and he says he will drive:



In this email, he says he is my biggest threat:



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.

When he changed his Facebook photo to be a big knife, Sean Boushie changed the address he was at to show my home address in Marietta Georgia, to indicate he was there with the knife:



I was not a gun owner before this happened to me, but I now own a gun. Because I do not yet have a carry permit, and because I travel all over the country, carrying a gun for protection is legally problematic. So, I bought pepper spray, a little buzzer-like stun gun, a portable alarm, a

dashcam, and a Louisville Slugger baseball bat. The pepper spray, stun gun, and portable alarm go everywhere I go except courthouses, police stations, and other places where these items are prohibited. The baseball bat and dashcam remain in my Jeep at all times. I keep my doors locked at all times, consciously try to always park under a light, sit with my back to the wall so I can see an entire room, walk briskly, and consider that anyone approaching could be a danger. I can no longer publish where I will be working because Sean Boushie and cyber-stalkers have threatened to come and hurt me. I am attempting to keep the location of my new residence a secret so stalkers will not come and harm me and terrorize me as some have published they will do. I heave a sigh of relief every time I turn on my car and it doesn't blow up. On two occasions, I have come to my 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 my pocket. While in Montana, I am wearing a bulletproof vest.

I do these things because I fear for my safety.

My family is terrorized by the cyber-stalking and threats. My wife and I rarely ever had a relationship problem in 42 years together, but she divorced me solely because she is absolutely terrorized. My adult children are very afraid. My daughter will not allow me to have any communication with my two precious granddaughters who I love more than words could ever express. When my wife announced she was divorcing me, she specifically stated that she was doing it in hopes that she could distance herself from Sean Boushie, the cyber-stalkers, and threats.

One of Sean Boushie's associates, Curtis Butler, has recorded a YouTube video in which he threatens to track me down wherever I move and do bodily harm to me. 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 me. This video can be seen at: http://youtu.be/6eHFl2jp1KU

Sean Boushie has attempted to terrify, threaten, harass, annoy, and offend me with lewd and profane language, lewd and lascivious acts, threats to inflict physical harm, and more.

From: seanboushie@gmail.com [mailto:seanboushie@gmail.com]

Sent: Sunday, February 10, 2013 6:55 PM

To: Bill Windsor

Subject:

Once again.... Take your bullshit and shove it all up your big fat pie hole. I'd you don't like my right to free expression as exercised by my freedom of speech, then go fuck yourself. You are a liar, a scam artist, a fraud, and you are stupid. Now go the fuck away. Tell cox she can suck my balls too. Bye asshole.

Sent from my Verizon Wireless BlackBerry

From: seanboushie@gmail.com [mailto:seanboushie@gmail.com]

Sent: Monday, February 11, 2013 12:26 AM

To: Nobodies@att.net Subject: Dumbass

Man you really are the stupidist asshole I have ever encountered, next to my in laws and Mr shitbuery. Figure it out dumbass, I'm not going away, I do r recogniE your bs courts. Or any law enforcement. Your only hope is to shut the fuck up. And leave me alone.. I wil, give you five dave to remove all your crap about. Me, then I'm coming after you and your wife for a nice fat check. You are a liar, and a s cam artist.but you aint getting lug ofthis. Now...fuck off asshll.e!!!!!!!!!!!!!

Sent from my Verizon Wireless BlackBerry

From: William Windsore [mailto:billwindsore@yahoo.com]

Sent: Sunday, June 30, 2013 10:24 PM

To: nobodies@att.net

Subject:

Oh Mr. Windsore is afraid of a little email, such a little dicked coward. Do you have tiny feet and hands too? So when are you coming dumbass?? My pie is going bad. How is your stalking trip in Kansas City going? Lol, such a sucker... Wrong county dumbass.

From: William Windsore [mailto:billwindsore@yahoo.com]

Sent: Tuesday, July 02, 2013 11:33 PM

To: nobodies@att.net

Subject: [Bulk]

Oh nooooooooo Mr Billy Windsore is coming.. What am I going to do??? Oh nooooooooo.. I make jokes, because that's what you are. One big fat fucking joke!!! Fuck you Mr Windsore!!! The question is, do you have the balls to do your stalking during daylight hours?? Answer: fuck no!!! You are a little sickes coward!! Fuck you asshole, fuck you...

From: William Windsore [mailto:billwindsore@yahoo.com]

Sent: Wednesday, July 03, 2013 12:07 AM

To: nobodies@att.net

Subject: [Bulk]

Fuck you fuc

fuck you fuck youFuck you fuck youFuck you fuck youFuck you fuck you

Discuss: <u>Lawless America Movie Road Trip Show with William M. Windsor - CHANGED to Monday January 7, 2013 from 10-midnight Eastern Time</u>

Bite me Asshole (gofuckyourself@yahoo.com, IP: 74.82.64.144) — 2013-01-05 20:38 What a worthless liar... Enjoy broadcasting from jail.

There are many of these.

Virtually all of the stalking and harassment has been cyberstalking, the use of the Internet and email to stalk and harass me and those acquainted with me. The stalking includes the making of false accusations and false statements. These include that I am a pedophile, a pedophile lover, anti-gay, bigoted, a criminal operating a scam, a person who has sex with animals, a sexual deviant, a terrorist, a serial killer, and more. Sean Boushie has participated in my online radio talk shows to monitor and/or to disrupt the calls and the online chat.

Any reasonable person in possession of this information would regard it as sufficient to cause another reasonable person distress.

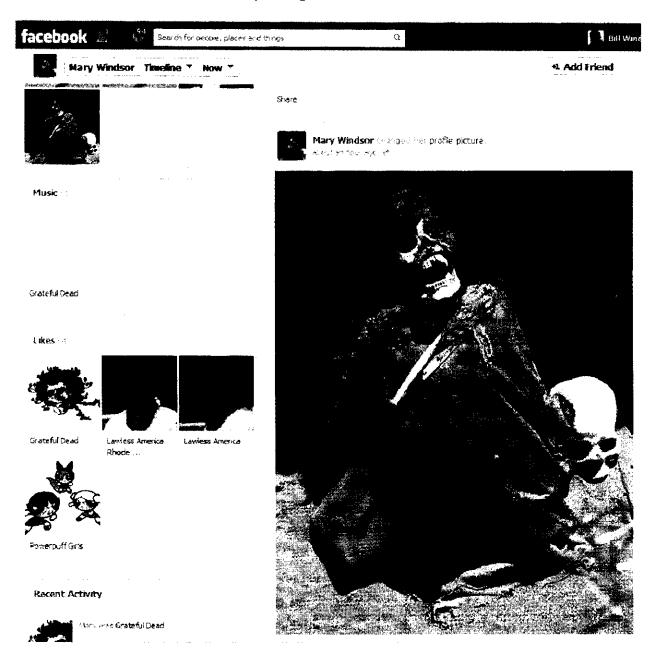
Sean Boushie and other stalkers have repeatedly violated my privacy rights and copyright by using photos and videos of me that they have no legal right to use. Photographs of me have been doctored. Absolutely sickening videos have been produced about me.

I believe Sean Boushie may be the person who set up Facebook pages in the names of my deceased parents.

My father's show him on his death bed and in his casket at the funeral home:



The page set up in my mother's name shows a skeleton with a wig on it and claims it is my mother who died of breast cancer 35 years ago:



In a subsequent posting, my father is shown allegedly having phone sex with my deceased mother:



I have 15 gigabytes of online posts, emails, videos, and more.

I know that Sean Boushie uses multiple aliases and screen names in his stalking of me.

I did file a complaint with the University of Montana campus police, FBI, and Missoula Police, but the police told me I needed to make a police complaint in Cobb County to start the process. I have done so; Case #13007687.

Since May 2012, Sean Boushie has emailed me under various names and email addresses. He has posted harassing messages and threats on my website, on my Facebook page, on my YouTube page, and on the sites and pages of others.

I sent several cease and desist emails to Sean Boushie as well as complaints to abuse@yahoo.com and abuse@gmail.com. I kept copies of those emails, but I am currently unable to locate them.

I do not know Sean Boushie. I have never met him. I apparently became a target because I know and believe Crystal Cox, a woman that he has had problems with. I have received reports from others who say they have been cyber attacked by him. He has threatened my family.

NOTE: I prepared this document using Microsoft Word. Due to the massive volume of the emails, threats, etc., I have not copied all of this to present. I can provide the Court with this document in Microsoft Word format so the Court can click the links to see the evidence.

<u>Sean Boushie's YouTube page</u> was filled with links to videos about guns and explosives. Anticipating that his YouTube account might quickly disappear (as it did), I captured an <u>Activity</u> <u>Log</u> and screenshots: <u>Screenshot 1</u> -- <u>Screenshot 2</u> -- <u>Screenshot 3</u> -- <u>Screenshot 4</u> -- <u>Screenshot 5</u> -- <u>Screenshot 6</u> -- <u>Screenshot 7</u>.

One of the YouTube videos that Sean Boushie has liked is titled "The Wrong and Right Way to Shoot Someone."

Sean Boushie has called me crazy in a wide variety of ways, says I am a "liar" (which I am not), and of "dubious moral character" (which also is not true). Sean Boushie goes on and on and on as if he doesn't have a concern in the world about the easily-proven libel and slander. He has threatened to come after me and make sure I am locked away forever. He makes veiled and sometimes not-so-veiled threats of physical violence. He indicates he plans to shoot me if I come near his home. I do not doubt for a second that this guy would attempt to have physical harm done to me.

I sent Sean Boushie several cease and desist notices. He acknowledged this in a **September 13**, **2012 post**, yet I have email after email, messages, comments posted on my website, TalkShoe chat, YouTube Channel, and Facebook page well after he acknowledged the case and desist. This is clear evidence of stalking. **Message 5-6-2012** -- **Message 5-7-2012** -- **Email #1 9-13-2012** -- **Email #2 9-13-2012** -- **Email #3 9-13-2012** -- **Email #4 9-13-2012** -- **Email #1 9-14-2012** -- **Email #2 9-14-2012** -- **Email 1-3-201** -- **gun threat** -- **Email 1-5-2013**

He committed extensive harassment on the <u>Lawless America TalkShoe Show</u>, and we have the chat logs to prove it.

One of the emails I received from him is from **gofuckyourself@yahoo.com**, and among other things, he threatens me with jail and says: "Bite me Asshole."

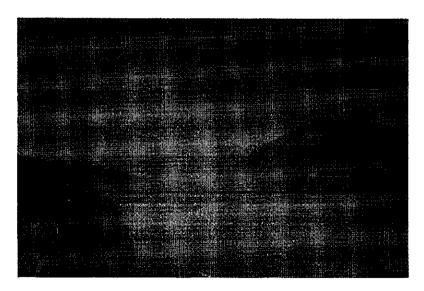
MONT CODE ANN § 45-5-201. Assault:

- (1) A person commits the offense of assault if the person:
- (a) purposely or knowingly causes bodily injury to another;
- (b) negligently causes bodily injury to another with a weapon;
- (c) purposely or knowingly makes physical contact of an insulting or provoking nature with any individual; or
- (d) <u>purposely or knowingly causes reasonable apprehension of bodily injury in another.</u>
- (2) 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.

Sean Boushie has purposely and knowingly caused me and my family to have reasonable apprehension of bodily injury.

As of July 21, 2013, there were 18 counts of Assault identified on the website -- <u>List of Sean Boushie Violations of the Crime of Assault</u>. Enter this URL to see the evidence of each of these: http://seanboushie.com/?cat=102 There is another one now with his claim of shooting at me on August 4, 2013.

On August 4, 2013, I drove to Missoula from Billings. During that drive, a car in the lane to my right and just ahead of me burst into flames and a cloud of smoke billowed out, completely obscuring the roadway and the other vehicles. I grabbed my camera and was able to snap a couple of photos after I had slowed.



The smoking car is in the right lane in the photo above and cannot be seen for all the smoke. Because of the death threats that I have received, I didn't stop, though I believe the car in front of me did.

I posted news of this on my Facebook page. Then at 9:03 pm, I received this email from Sean Boushie in which he claims he shot the car to my right while trying to shoot me. Note: Lately, he uses my name with an e on the end as his alias when he emails me:

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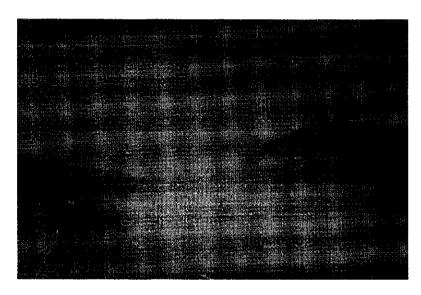
Subject: [Bulk]

Here 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.

Mont. Code Ann. § 45-5-202. Aggravated assault.

(1) 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.
(2) A person convicted of aggravated assault shall be imprisoned in the state prison for a term not to exceed 20 years and may be fined not more than \$50,000, except as provided in 46-18-219 and 46-18-222.

On August 4, 2013, I drove to Missoula from Billings. During that drive, a car in the lane to my right and just ahead of me burst into flames and a cloud of smoke billowed out, completely obscuring the roadway and the other vehicles. I grabbed my camera and was able to snap a couple of photos after I had slowed.



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Subject: [Bulk]

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In addition to the previous criminal charges that specifically apply to eligibility for Order of Protection
Sean Boushie has committed many other crimes against me.

Mont. Code Ann. § 45-6-332. Identity Theft

- (1) A person commits the offense of theft of identity if the person purposely or knowingly obtains personal identifying information of another person and uses that information for any unlawful purpose, including to obtain or attempt to obtain credit, goods, services, financial information, or medical information in the name of the other person without the consent of the other person.
- (2) (a) A person convicted of the offense of theft of identity if no economic benefit was gained or was attempted to be gained or if an economic benefit of less than \$1,000 was gained or attempted to be gained shall be fined an amount not to exceed \$1,000, imprisoned in the county jail for a term not to exceed 6 months, or both.
- (b) A person convicted of the offense of theft of identity if an economic benefit of \$1,000 or more was gained or attempted to be gained shall be fined an amount not to exceed \$10,000, imprisoned in a state prison for a term not to exceed 10 years, or both.
- (3) As used in this section, "personal identifying information" includes but is not limited to the name, date of birth, address, telephone number, driver's license number, social security number or other federal government identification number, tribal identification card number, place of employment, employee identification number, mother's maiden name, financial institution account number, credit card number, or similar identifying information relating to a person.

 (4) If restitution is ordered, the court may include, as part of its determination of an amount owed, payment for any costs incurred by the victim, including attorney fees and any costs incurred in clearing the credit history or credit rating of the victim or in connection with any civil or administrative proceeding to satisfy any debt, lien, or other obligation of the victim arising as a result of the actions of the defendant.

As of July 21, 2013, there are 53 counts of Identity Theft identified on the website: <u>List of Sean Boushie Violations of Identity Theft</u>. Enter this URL to see the evidence of each of these: http://seanboushie.com/?cat=14

Mont. Code Ann. § 45-8-21. Criminal Defamation.

- (1) 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.
- (2) 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.
- (3) Violation of subsection (2) is justified if:
- (a) the defamatory matter is true;
- (b) the communication is absolutely privileged;
- (c) the communication consists of fair comment made in good faith with respect to persons participating in matters of public concern;
- (d) the communication consists of a fair and true report or a fair summary of any judicial, legislative, or other public or official proceedings; or
- (c) the communication is between persons each having an interest or duty with respect to the subject matter of the communication and is made with the purpose to further the interest or duty.
- (4) A person may not be convicted on the basis of an oral communication of defamatory matter except upon the testimony of at least two other persons that they heard and understood the oral statement as defamatory or upon a plea of guilty or nolo contendere.

As of July 21, 2013, there are 22 counts of Criminal Defamation law identified on the website: List of Sean Boushie violations of Criminal Defamation law. Enter this URL to see the evidence of each of these: http://seanboushie.com/?cat=100

Mont. Code Ann. § 45-8-220. Criminal Invasion of Privacy.

- (1) 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.
- (2) Subsection (1) does not apply to a person who poses as another individual with the express consent of that other individual.

As of July 21, 2013, there are 15 counts of Criminal Invasion of Privacy law identified on the website: <u>List of Sean Boushie violations of Criminal Invasion of Privacy law</u>. Enter this URL to see the evidence of each of these: http://seanboushie.com/?cat=99

Mont. Code Ann. § 45-5-213. Assault with weapon.

- (1) A person commits the offense of assault with a weapon if the person purposely or knowingly causes:
 - (a) bodily injury to another with a weapon; or
- (b) reasonable apprehension of serious bodily injury in another by use of a weapon or what reasonably appears to be a weapon.
- (2) (a) Subject to the provisions of subsection (2)(b), a person convicted of assault with a weapon shall be imprisoned in the state prison for a term not to exceed 20 years or be fined not more than \$50,000, or both.
- (b) In addition to any sentence imposed under subsection (2)(a), if the person convicted of assault with a weapon is a partner or family member of the victim, as defined in 45-5-206, the person is required to pay for and complete a counseling assessment as required in 45-5-206(4).

Sean Boushie has threatened me with a gun, with a knife, with Charles Manson's photo, and by claiming he shot at me on I-90 on August 4, 2013.

Mont. Code Ann. § 45-5-208. Negligent endangerment -- penalty.

(1) 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.

(2) A person convicted of the offense of negligent endangerment shall be fined an amount not to exceed \$1,000 or imprisoned in the county jail for a term not to exceed 1 year, or both.

Sean Boushie's cyberstalking, lies, defamation, slander, harassment, and threats feed other sick people who could pull the trigger or drive the truck. Curtis Butler is an excellent example.

Mont. Code Ann. § 45-5-203. Intimidation.

- (1) 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:
 - (a) inflict physical harm on the person threatened or any other person;
 - (b) subject any person to physical confinement or restraint; or
 - (c) commit any felony.
- (2) A person commits the offense of intimidation if the person knowingly communicates a threat or false report of a pending fire, explosion, or disaster that would endanger life or property.
- (3) A person convicted of the offense of intimidation shall be imprisoned in the state prison for any term not to exceed 10 years or be fined an amount not to exceed \$50,000, or both.

Sean Boushie has repeatedly tried to intimidate me. He tried to stop me from coming to Montana to bring charges against him by threatening me with physical harm and death.