

CASE NO. 13D1747

William M. Windsor

Plaintiff,

v.

Claudine Dombrowski,

Defendant

§
§
§
§
§
§
§
§
§
§

IN THE DISTRICT COURT

SHAWNEE COUNTY, KANSAS

SWORN AFFIDAVIT OF WILLIAM M. WINDSOR

I, William M. Windsor, 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 this matter and in any other legal proceeding.

2. I failed to include Exhibit 5 with the AMENDED VERIFIED PETITION FOR EX PARTE PROTECTIVE ORDER filed on July 26. It is attached hereto as Exhibit 5.

3. I failed to include one document in Exhibit 6 with the AMENDED VERIFIED PETITION FOR EX PARTE PROTECTIVE ORDER filed on July 26. It is attached hereto as Exhibit 6A.

4. I failed to include Exhibit 8 with the AMENDED VERIFIED PETITION FOR EX PARTE PROTECTIVE ORDER filed on July 26. It is attached hereto as Exhibit 8. This exhibit is information posted on the American Mothers Political Party Facebook page. Page 4 shows one mention of watching the movie "Kill Bill." The members of the organization were encouraged to watch it. This document is filled with many other defamatory published statements. DOMBROWSKI has published that she and she alone is responsible for everything on this website. This is shown in Exhibit 47 hereto.

5. I failed to include Exhibit 9 with the AMENDED VERIFIED PETITION FOR EX PARTE PROTECTIVE ORDER filed on July 26. It is attached hereto as Exhibit 9.

6. I failed to include some documents with Exhibit 10 with the AMENDED VERIFIED PETITION FOR EX PARTE PROTECTIVE ORDER filed on July 26. It is attached hereto as Exhibit 10A. Sean Boushie has stalked me by email, Facebook messages and posts, by mail, and through published information online. He has threatened me in many ways. He uses lewd language and is continually telling me to go fuck myself. He publishes information online pretending to be me, and he uses aliases including John Smith and John Brown. He sends me emails showing the email address as killbill@yahoo.com and

gofuckyourself@yahoo.com. He is associated with DOMBROWSKI and the American Mothers Political Party as well as with Joeyisalittlekid.blogspot.com.

7. I failed to include Exhibit 19 with the AMENDED VERIFIED PETITION FOR EX PARTE PROTECTIVE ORDER filed on July 26. It is attached hereto as Exhibit 19. This exhibit shows some of DOMBROWSKI'S websites. She stalks and defames a number of local attorneys, doctors, and social workers by setting up websites in their names. Note that she publishes all of their personal information – name, address, phone, email, and more. These websites were set up before she and her organization and associates began stalking me. It demonstrates a pattern and practice of wrongful behavior by DOMBROWSKI. Page 1 of Exhibit 19 is the website about Dr. David C. Rodeheffer. Page 2 of Exhibit 19 is the website about Dr. Milfred 'Bud' Dale. Page 3 of Exhibit 19 is the website about Christopher Dykes. Page 4 of Exhibit 19 is the website about Kara Haney. Page 5 of Exhibit 19 is one of several websites about Rene Netherton. Page 6 of Exhibit 19 is the website about Donald R. Hoffman. Page 7 of Exhibit 19 is the website about Drex Flott. Page 8 of Exhibit 19 is a website about Jill Dykes. Page 9 of Exhibit 19 is the website about GAL Scott D. McKenzie. Pages 10 and 11 of Exhibit 19 are websites about her former husband, Hal Richardson. Page 12 of Exhibit 19 is another website about Jill Dykes. Page 13 of Exhibit 19 is

another website about Rene Netherton. Pages 14-18 of Exhibit 19 is a website called Glenn's Cult that also attacks Rene Netherton. Pages 19-21 of Exhibit 19 is a website called The Truth About The Family Court. Pages 22-23 of Exhibit 19 is a website called Kansas Court Whores, one of the sites that published an article calling me a sexual predator. Pages 24-29 of Exhibit 19 is a website called Kansas Fatherhood Initiatives, one of the sites that published an article calling me a sexual predator.

8. I have been unable to locate Exhibit 7. A recent posting online by DOMBROWSKI said she would have an army to meet me when I came to Topeka.

9. Exhibit 47 hereto includes several publications by DOMBROWSKI that make it clear that she is the American Mothers Political Party and claims full responsibility for everything that appears on its web pages. She states that she created the American Mothers Political Party. Thousands of people involved with family court issues nationwide know that DOMBROWSKI is the American Mothers Political Party.

10. Exhibit 48 hereto contains two published articles by DOMBROWSKI on the news service, Newsvine. One shows the video that I filmed of her and says I am a con man. The other says I am a sexual predator. These articles clearly show they were published by her.

11. I ask the Court to realize that it is not possible for the hundreds and hundreds of defamatory articles posted in the name of DOMBROWSKI could have been done by anyone other than her. She also claims responsibility for everything published by the American Mothers Political Party, and there is a massive amount of stalking and defamation done on their Facebook page, which is provided as part of Exhibit 1 – flash drive.

12. Exhibit 49 hereto is a publication that DOMBROWSKI made that talks about the Safe At Home program and shows her card with the assigned address. This is the address published online for the American Mothers Political Party. This is defamatory and stalking. For someone else to have written this article, they would have to have access to her state-issued ID card as well as information about this program. DOMBROWSKI wrote this, just as she has written and claimed all of the stuff that has been published.

13. Exhibit 50 hereto is the home page of a website titled “I-am-a-pedophile-william-windsor.” It shows 102 articles have been published about me on this site in 2013. It lists many other sites about me, including sites about me being a pedophile, having a tiny penis, being a terrorist, being a sexual deviant, not having balls, liking to suck cock, and other such outrageous terms.

14. Exhibit 51 hereto is DOMBROWSKI'S most recent post on her website. In this post, she admits that she and the American Mothers Political Party are on in the same. She speaks of an article that recently denounced her written by internationally-renowned spousal abuse advocate, Lundy Bancroft. This article is included in a prior exhibit. Additional pages from her website are included with comments about me.

15. I have shown that I am in fear for my safety. I have demonstrated that my family is terrorized in fear for their safety. I have shown a perhaps unprecedented volume of stalking, in terms of both the number of people involved and the volume of written material. I have shown that Google shows over 15,000 web pages that publish that I am a sexual deviant. I am not a sexual deviant. I am not any of these things that these sick people publish. I have shown a continual publication of hundreds of articles over a long period of time that is continuing as I type this. I have proven as well as anyone could that DOMBROWSKI published an extensive amount of defamatory and stalking material. To say that she didn't publish this material would be to say that someone has stolen her information, ID card, identity, business, Facebook pages, LinkedIn pages, MySpace pages, YouTube pages, WordPress pages, numerous websites, Business Week login,

Newsvine login, and has done all of this without the very active DOMBROWSKI ever saying someone was doing this.

16. I have filed criminal charges with the Topeka Police Department. I ask this Court to contact the District Attorney and ask him to investigate. If this doesn't meet the criminal defamation statute, I don't believe anything ever will.

FURTHER SAITH AFFIANT NOT.

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

Executed this 27th day of July 2013.

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

William M. Windsor

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 SWORN AFFIDAVIT OF WILLIAM M. WINDSOR 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 27th day of July 2013.

William M. Windsor

Sworn and subscribed before me this 27th day of July 2013.

Brandon Foat
Notary Public

BRANDON FOAT
NOTARY PUBLIC
STATE OF KANSAS

My Commission Expires 05/24/17