# Exhibit 4.2

# CAUSE NO. 88611

William M. Windsor	§	IN THE DISTRICT COURT
Plaintiff,	§	
V.	§	•
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com, Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

### MOTION FOR SANCTIONS AND PERJURY AGAINST SEAN D. FLEMING

William M. Windsor ("Windsor") files this MOTION FOR SANCTIONS AND PERJURY AGAINST SEAN D. FLEMING.

- On February 21, 2014, Defendant Sean D. Fleming ("Fleming") signed a sworn affidavit under penalty of perjury, and that affidavit has been filed in this case. Fleming's affidavit says that as a result of Windsor's lawsuit against him, he has become "frightened to engage in any type of public debate or public forum or to exercise my Constitutional rights."
- 2. Yet on May 6, 2014, Fleming of Madison Heights, Michigan published this on Joeyisalittlekid.blogspot.com: "Here is one thing if Windsor wants to have a name calling fest I am all for it. I bet he can not hang. He can meet me in at one of those places on 8 mile where **I** will tear him apart like the ogre he is."
- 3. And on May 7, 2014, he published this on Joeyisalittlekid.blogspot.com: "I have Decided that I will be creating a series on Lawless America, Citizen Gran Juries, and more. As of

this time it is called The Slanderers <u>www.theslanderers.com</u> There will be a weekly segment. I will go into the depths of Lawless America, interview people who have left the revolutionary movement. Go over the stories they gave, see where they are, how they feel about the movement, etc. I will also go into the coming up of the movement lawless America, Grip, and also about the Maid of the Mist, and also 1st Communications...."

- 4. So, Sean D. Fleming who signed a sworn affidavit saying how frightened he is of "any type of public forum" announced he will be doing a weekly YouTube show all about Windsor, a public forum in which he will undoubtedly defame Windsor up one side and down the other. He has, in Windsor's opinion, committed perjury. Windsor believes Fleming lied because he wanted the Court to feel sorry for him and provide support for his unsuccessful efforts to get out of the lawsuit.
- 5. A search of Joeyisalittlekid.blogspot.com reveals that Fleming posted one-hundred-seventy-three (173) published statements on that site from February 21, 2014 when he signed the sworn affidavit to May 13, 2014. He lied to the court.
  - 6. Windsor asks this Court to sanction Fleming for filing a false sworn affidavit.
  - 7. Windsor asks this Court to pursue criminal charges against Fleming for perjury.

Submitted this 13th day of June, 2014,

when h. White

William M. Windsor

PO Box 150325, Dallas, TX 75315, email: bill@billwindsor.com -- 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 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.

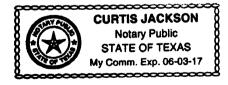
This 13th day of June 2014.

William M. Windsor

Cultiante Clinder

Sworn and subscribed before me this 13th day of June 2014.

Notary Public



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v.	§	
Joeyisalittlekid, Megan Van Zelfden,	§	
Joeyisalittlekid.blogspot.com, Brannon	§	
Bridge, Curtis Butler, Sean D. Fleming,	§	40th JUDICIAL DISTRICT
Albert J. Fiorini, Lisa Jones, Sam Round,	§	
Kellie McDougald, Brandy Owen,	§	
Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

# **FIAT**

Honorable Bob Carroll
Judge, 40<sup>th</sup> Judicial District Court
Ellis County, Texas

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Michelle Stilipec, Sean Boushie,	§	
Allie Overstreet, American Mothers	§	
Political Party, Claudine Dombrowski,	§	
and Joey Does 1-1000,	§	
Defendants	§	ELLIS COUNTY, TEXAS

### **CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing MOTION FOR SANCTIONS AND PERJURY AGAINST SEAN D. FLEMING to each Defendant with a valid address by email or mail:

JOEYISALITTLEKID Secretary of State, State of Texas 1100 Congress, Capitol Bldg. Room 1E.8, Austin, Texas 78701

Joeyisalittlekid.blogspot.com c/o Google CSC – Lawyers Incorporating Service 2710 Gateway Oaks Drive, Suite 150N, Sacramento, CA 95833

Megan Van Zelfden 6445 Love Drive #2041, Irving, TX 75034 469-298-0890

Brannon Bridge c/o John M. Perkins III 201 E Main Street – Suite 209, Waxahachie, TX 75165 Phone: 469-765-6516

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Sean D. Fleming c/o Barbara L. Hachenburg Germer Attorneys at Law Three Allen Center, 333 Clay Street, Suite 4950, Houston, TX 77002 713-650-1313 Fax: 713-739-7420

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Albert J. Fiorini 505 Promontory Drive West, Newport Beach, CA 92660 email: newportbay@aol.com

Lisa Jones 5121 Pearson Rd, Santa Fe, TX 77517 832-788-4405

Sam Round c/o Sarah Holley Long Walters Balido & Crain Meadow Park Tower, 10440 North Central Expressway, 15<sup>th</sup> Floor, Dallas, TX 75231 Email: sarah.long@wbclawfirm.com 214-347-8342 Fax: 214-347-8343

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Sean Boushie 570 Grandview Drive Stevensville, MT 59870 email: missoulagloryholefun@yahoo.com

Allie Overstreet

1208 N Main, Higginsville, Missouri 64037 email: loverstreet09@yahoo.com

Claudine Dombrowski

c/o Kansas Secretary of State's Safe at Home Program Memorial Hall, First Floor, 120 SW 10<sup>th</sup> Avenue, Topeka, KS 66602-1594 email: safeathome@sos.ks.gov -- email: angelfury@live.com

American Mothers Political Party c/o Secretary of State - State of Kansas 120 SW 10<sup>th</sup> Avenue, Topeka, KS 66602-1594 email: safeathome@sos.ks.gov -- email: angelfury@live.com

Google, Inc.
Shannon Zmud Teicher
Jackson & Walker, 901 Main Street, Suite 6000, Dallas, TX 75202
214-953-6000
steicher@jw.com

This 12th day of August, 2014,

William M. Winder

William M. Windsor

PO Box 150325, Dallas, TX 75315, email: bill@billwindsor.com -- Phone: 770-578-1094