

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 09-CV-00309 MSK-KMT

SUZANNE SHELL

Plaintiff

v.

AMERICAN FAMILY RIGHTS ASSOCIATION, et. al.

Defendants

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DEFENDANT WISEMAN REPLY TOO Plaintiff RESPONSE TO WILLIAM WISEMAN dba  
WISEMAN STUDIOS' MOTION TOO DISMISS AND QUASH SERVICE OF SUMMONS  
FOR LACK OF PERSONAL JURISDICTION [#140] filed on 7/27/2009

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COMES NOW Defendant WISEMAN , and WISEMAN studios in response too the  
PLAINTIFF'S RESPONSE TOO DEFENDANT WILLIAM WISEMAN dba WISEMAN  
STUDIOS' MOTION TOO DISMISS AND QUASH SERVICE OF SUMMONS FOR  
LACK OF PERSONAL JURISDICTION [#140] filed on 7/27/2009

Defendant WISEMAN , and WISEMAN studios would like too respond too a  
few things of The Plaintiff's motion and ignore the rest As Lies or it dont matter:

1. The Plaintiff allegations That Defendant WISEMAN did Not Draw His own motions is  
True and False, Defendant WISEMAN plagiarized The Motions From Dan Slater, Brenda  
swallow and Bill Tower and the Only person Defendant WISEMAN sees complaining is the  
Plaintiff. Dan Slater is a Licensed Attorney in the state of Colorado and if dan slater had a

DEFENDANT WISEMAN RESPONSE TOO 1  
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JURISDICTION [#140]

problem with me stealing His words You would Think he would have Filed a Motion with the Court or even emailed me asking me too stop . mrs.shell does not work for mr. slater, nor is she towers or swallows attorney and has no grounds how I Drew Up The motion The Fact Remains I Have Filed A Motion. I asked for an attorney too be appointed and it was denied. Now I have too do the best I can.

2. thetruthistold.com is My Right Too Free speech The Plaintiff Attacked Me I fought back End Of story.

3. I publish the truth is told and I publish the truth not the lies like mrs. shell publishes on bad advocates.

4. I publish letters from people who have been harmed by mrs. shells website so they can tell their side.

5. My website was made too tell the truth about the things on the BAL and the Project.

6. Everything on my website has proof with it.

7. I allow people too tell their side of the story when Shell puts something on bad advocates.

8. I allow people too post their side of the story when Shell puts something on bad advocates.

9. mrs. shell cant seem too get that all anybody wants is for her too leave us alone. Mrs. shell uses different names too get into groups where she is not wanted and we dont spend our lives thinking about her and we are trying too help other people with their problems. Nobody talks about mrs. shell until she or one of her people start trouble.

10. mrs. shell says people exploit me every time i publish the truth.

11. The things on my website are the truth. The things on bad advocates are lies.

12. Slander and defamation mean someone lied. There are no lies on my website unless shell lied when she posted it on the project and then I posted it on my website.

13. and 14. shell is the one who copied all her stuff from other websites. My website is proof that shell never wrote anything she didnt take from someone else.

15. Everything on my website is legal.

16. shell had my website shut down and Domains By Proxy making my name, home address, phone number and email address Published shell wrote about me and Cletus Kiefer on <http://www.profane-justice.org> so i grabed a copy as evidence So mrs.shell Wrote Domains By Proxy Claiming That i took it off her website and it was a trade Secert and Copyrighted when i would not provide mrs.shell with my home address she had my Domains By Proxy and my website shut down and then she posted my home address on her website with a minor childs home address and that is not legal and I think she did it too harm me.

17. The video in question was purchased on the Internet from VOCAL. Did The Plaintiff file a police report about it being stolen by VOCAL Missouri? A small clip out of that tape purchased by me put on my website where The Plaintiff admits she printed a Phoney Presspass. The audio is on my website. The defendants wiseman and wiseman studios made no money proving The Plaintiff Held A Phoney Press pass printed on The Plaintiff computer.

thetruthistold.com is not a business but too expose internet stalking by a phoney member of the press, Attorney, doctor, or what The Plaintiff thinks she wants too be at any given time.

The defendant is not now or will ever be an advocate ? As shells own words I was a website designer. How does that compete with mrs. shell.

18. So what if I was a member of cencom. Kandy was a member of cencom too and both of

us got kicked off cencom and I got kicked out of AFRA because I wont stop telling the truth about shell.

19. I dont know about any advertisement of thetruthistold.com on AFRA.

20. When people write news articles about shell people read them because shell has harmed a lot of people and nobody likes her because she thinks she is gods gift too the world and if that is cyberstalking like mrs. shell says then what do you call what she does too people she puts on the BAL?

21. I did not try too lie about what I said.

22. I emailed the librarian too ask some questions about the seminar and they wrote me back and asked if I had a problem with family rights radio. They said do I know something they don't and I told them I guess I do know something you dont about family rights radio im the owner. I didnt want them too use my domain name too scam library and the IRS. mrs. shell was triing too scam the douglas county library and told them family rights radio had a 501(c)(3) and family rights radio did not have a 501(c)(3) and I know that because my domain name was family rights radio and they were trying to use my domain name so they could have their seminar without paying.

23. David Davis, the process server the Plaintiff hired too serve me shook My Hand with a tight Grip and would Not Let Go and at the same Time Reached his other arm Too His Back like He was Going For a Gun. what would anyone do? I grew Up an abused child. I expected The process server Too Hurt me Because he did not inform me he was a process server. Nor was I hiding. Before I was even served I gave this court my mailing address. It not my fault the Plaintiff didn't look at court Records For my address Nor was it my job too keep her informed

when people very close too me pass away and I move. I was not served when I moved and the Plaintiff is not my mother, grandmother or attorney or doctor and has no bussiness Of Stalking me or anyone eles and I don't Hide. It was Real Nice Of The Plaintiff Too Hire David Davis making the defendant Fear For His Life.

24. The Plaintiff points out that Defendant WISEMAN had been provided with a motor home and a suburban. This is 100% True, The motor home"RV" 34 ft and Chevy suburban was owned By My Landlord and his wife, Phyllis Williams and Ron Williams, and They Helped me Buy it and they have sense passed away and I had too move out of my house into my RV because their kids wanted their land and told me too get my stuff off of it And everyday I miss Ron and Phyllis and it Hurts. If the Plaintiff has a problem with How Im Living Right Now the Plaintiff is more then welcome Too Buy Me something Better. As this is now my Home. For at least another week.

25. The Plaintiff had her lawyer Greg hession and Linda Elf has threaten defendant wiseman. Did the Plaintiff tell the court that the Plaintiff and the Plaintiff buddies called defendants wiseman a retard 111 times on mrs. shells website the project? Was The Plaintiff worried about defendants wiseman disability when she was embarrassing defendants wiseman in public? Aren't there laws too protect the handicapped?

26. DEFENDANT WISEMAN and wiseman studios filed a motion too dismiss and quash service of summons for lack of personal jurisdiction The Plaintiff Responded But Failed Too deny any of the Defendants claims and tried Too spin the Motion Into a 12(b)(6) motion too dismiss. the Defendants william wiseman and wiseman studios did not File a 12(b)(6) motion Defendants william wiseman and wiseman studios FILED a motion too dismiss and quash

service of summons for lack of personal jurisdiction and Once a defendant challenges a court's exercise of personal jurisdiction over it, the plaintiff bears the burden of establishing personal jurisdiction. Once the defendant has challenged the exercise of personal jurisdiction, the plaintiff bears the burden of showing that the court has jurisdiction. *KVOS, Inc. v. Associated Press*, 1936, 299 U.S. 269, 278, 57 S.Ct. 197, 200, 81 L.Ed. 183; *Cabbage v. Merchant*, 744 F.2d at 667.

27. The defendants used legal means to accomplish an illegal result, and/or used illegal means to achieve something that in itself is lawful in furtherance of the conspiracy? Now how do you legally do something illegal?

### ***CONCLUSION***

Wherefore, the DEFENDANT WISEMAN and wiseman studios moves this court and hereby requests this court Strike shells Response as Non responsive and grant Their motion too dismiss and quash service of summons in this case against the Plaintiff.

The Defendant herein also requests the court that this court take note of the criminal acts of the Plaintiff in this case proven by the defendants and dismisses the entire case brought against Defendant wiseman and award sanctions against the plaintiff and if the court sees fit too recommend criminal sanctions against the same.

Respectfully submitted August 20, 2009

*William Wiseman*

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the attached document DEFENDANT WISEMAN'S REPLY TOO PLAINTIFF'S RESPONSE TOO DEFENDANT WILLIAM WISEMAN dba WISEMAN STUDIOS' MOTION TOO DISMISS AND QUASH SERVICE OF SUMMONS FOR LACK OF PERSONAL JURISDICTION [#140] filed on 7/27/2009 sent too:

National Association of Family Advocates and  
Dorothy Kernaghan-Baez and  
Georgia Family Rights, Inc. each @ By Email

Leonard Henderson By Email

Susan Adams Jackson By Email

Anne E. Tower and By Email  
William O. Tower and By Email  
American Family Rights Association By Email

Brenda Swallow By Email

Illinois Family Advocacy Coalition and  
Renee Cygan and  
Mark Cygan By Email

Thomas M. Dutkiewicz dba Connecticut DCF Watch By Email

Aimee Dutkiewicz By Email

Dee Contreras By Email

Daniel Slater, attorney for Cheryl Barnes, CPS Watch, Inc. and  
Sarah Thompson via Court's ECF system By Email

Patrick D. Vellone and Jennifer E. Schlatter  
attorney for Ringo Kamens/Alex Bryan By Email

Suzanne Shell Court's ECF system

August 20, 2009

**William Wiseman AKA Wiseman Studios**

*William Wiseman*