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STATE OF OHIO  
IN THE COURT OF COMMON PLEAS OF OHIO  
CIVIL DIVISION

BRYAN ANTHONY REO, et. al., )  
Plaintiff/Counter-Defendant(s) )  
vs. )  
PASTOR MARTIN LINDSTEDT, CHURCH )  
OF JESUS CHRIST CHRISTIAN/ARYAN )  
NATIONS OF MISSOURI, )  
Defendant(s)/Counter-Claimants. )

No. 15CV001590  
RICHARD L. COLLINS JR

**DEFENDANTS'/COUNTER-CLAIMANTS' COUNTER-MOTION TO PLAINTIFF  
BRYAN REO'S FRIVOLOUS AND MALICIOUS MOTION TO STRIKE  
DEFENDANTS' ANSWER & COUNTER-CLAIM AND FOR PLAINTIFF TO BE  
SUMMARILY SANCTIONED FOR PERJURY AND FRAUD IN FILING REO'S  
MALICIOUS CIVIL COMPLAINT AND IN REO'S MOTION TO STRIKE**

COMES NOW the current Defendant(s)-Counter-Claimants Pastor Martin Lindstedt and Lindstedt's non-profit church corporation in good standing The Church of Jesus Christ Christian / Aryan Nations of Missouri (hereafter in person described as "Pastor Lindstedt" and the Church corporation referred to as "Pastor Lindstedt's Church") to timely file this Defendants' Counter-Motion to the first – and if Reo's previous 20+ lawsuits in Lake County and Reo's own previous failed federal lawsuit against Defendants in the Northern District of Ohio and Western District of Missouri are any indicator – of a series of frivolous and perjurious motions that this case has yet to see before being dismissed with prejudice by this Court. Plaintiff Bryan Reo's Motion to Strike of Oct. 27, 2015 was the day after Defendants' Answer & Counter-Claim was filed before this Court on Oct. 26, 2015. There is no postmark on the manila envelope as to when Reo actually mailed this Motion to Strike, but Pastor Lindstedt received it on Monday or Tuesday

Nov. 2d or 3d 2015 and thus has only a short time to answer – an advantage used by Bryan Reo when Reo begged U.S. Magistrate Judge Matthew Whitworth when Whitworth was going to dismiss Reo's bogus federal case against Defendants. With a mailing advantage of a week to get to Defendants via first-class postage and two to three days in response by Defendants, the 14 days to answer what is going to be dozens of frivolous and malicious motions for purpose of fraud and theft by Bryan Reo means in actuality only a two to four day period to answer Reo's never-ending purposeful vindictive maliciousness.

#### **I. STATEMENT OF REO-'FACTS'/REO-FRAUDS**

The first paragraph is true enough. Bryan Reo has sued Defendants before this Court for online defamation after losing in both the U.S. District Courts of Northern Ohio and Western Missouri. Everything that Bryan Reo is suing Defendants over dates from early 2010 to 2014, and was dismissed by these federal courts, except for Item #12, which consists of Defendants successful motions to the federal court in Missouri which led to Reo's federal litigation being dismissed as frivolous, baseless and without jurisdiction. Item #12 in any case is a public record, and thus cannot be actionable for defamation. Also Ohio Revised Statutes § 2305.03 and 2305.11 act as an absolute bar to Reo's case before this Lake County Court as regarding Statute of Limitations. The only items which are timely and within the Statute of Limitations are Defendants' Counter-Motions to Reo's fraudulent and baseless six or eight or ten Motions which were adjudged baseless and frivolous and without merit which Defendant Pastor Lindstedt published on Defendant/Counter-Claimant Church of Jesus Christ Christian / Aryan Nations of Missouri forums, blogs and web pages in July 2015 after the federal judge decided to flush Reo's toilet-paper fraudulent case without merit or jurisdiction.

As in Reo v. Hiram Reppert, 13CV002707 (which was 306 pages at a dime per page) Bryan Reo pretends that his version of what he thinks or pretends the law is or what he thinks it should be is what the law actually is. Reo tried to keep the Ohio Attorney General's Office from defending Hiram Reppert, who was the Department Head of Nuclear Engineering at Lakeland Community College in which Reo was trying to become a nuclear technician in the local nuclear power plant. Reo filed all sorts of motions in which he contested without merit that the Ohio Attorney General's Office was by Ohio law the proper defending attorney for employees of political sub-divisions of the State of Ohio. Hiram Reppert, who used to work in the local nuclear power plant was alarmed by Bryan Reo's antics, especially after Reo did something at



the nuclear power plant and was terminated and barred from ever going back. However, the Ohio Attorney General's Office couldn't simply state the facts that perhaps Hiram Reppert, acting as a moral and just man, prevented another Chernobyl or Fukushima or Three Mile Island by quote, "Getting rid of Bryan Reo . . ." . . . the next school shooter" from both the college and the plant.

Likewise, Pastor Lindstedt is the equivalent of Hiram Reppert who did a public service of "getting rid of Bryan Reo" from out of the aboveground Dual-Seedline Christian Identity Church in general and The Church of Jesus Christ Christian / Aryan Nations of Missouri in particular. By using fraudulent Digital Millennium Copyright Act take-down notices and tortuous interference of private contracts – which Bryan Reo accuses others of doing – Bryan Reo and Reo's sundry co-conspirator co-counter-defendants already named and unnamed took down Church property in the form of Church forums, blogs, e-mail lists, and web pages. Thus Pastor Lindstedt and Pastor Lindstedt's Church are One in defending their Faith. Bryan Reo has no standing in determining how Pastor Lindstedt and Pastor Lindstedt defend themselves from Bryan Reo's malicious, fraudulent criminal oppression using either the federal or state courts.

Insofar as Bryan Reo's co-conspirator co-counter-defendants are concerned, the Ohio Rules of Civil Procedure, as the Federal Rules of Civil Procedure, say that everyone and anyone who is a party to this case can be joindered to this litigation. In fact, Bryan Reo made much the same objection at the federal level which was countered by Defendants' Pastor Lindstedt and Lindstedt's Church asking Reo for proof that Reo's co-conspirator co-counter-defendants were not working in collusion with Reo. Reo knowing that Defendants had proof, demurred.

Reo also admits that some of Reo's co-conspirator co-counter-defendants, especially William Finck and "Pastor" Eli James (corporate name since 2005) real name Joseph November (since sometime before 1982) and others whose street addresses not yet known by Defendants are in fact public figures (as is Bryan Reo) purporting to be leaders within Christian Identity. The purpose of Defendants' Answer and Counter-Claim is to show that they were working in conspiracy with Bryan Reo to destroy Church property in Cyber-space and the Real World. Reo's claims to the contrary are fraudulent and irrelevant in that Reo isn't the ones who get to decide the merits of this case – a jury is to be the tryer of fact.

Reo then goes on to quote some "few choice morsels" from the first fifteen pages of Defendants' Answer and Counter-Complaint. These "few choice morsels" are taken out of context to Defendants' full Answer showing the full extent to Reo's perjury and fraudulent past

claims barred by the fact that they were presented already in federal court and dismissed and that the Ohio Statute of Limitations bars them from being heard again as well.

Unlike Saint Hiram of Reppert, who prevented Cleveland and much of Northern Ohio from glowing in the dark as a result of mamzer-monkeyshines or Lakeland Community College from becoming another Virginia Tech or Umpqua Community College as a result of mentally deficient or unstable mongrels with access to semi-automatic hi-capacity magazine pistols of the sort that Bryan Reo sports, the Ohio Attorney General's Office prevented Hiram Reppert from taking credit for saving dozens or hundreds or thousands or millions of lives at the paws of Bryan Reo. Having gotten wind of exactly what sort of creature Bryan Reo and Reo's co-conspirator co-counter-defendants were Defendants chose to spread the alarm like a Watchman. Plaintiff Bryan Reo and Reo's co-conspirator co-counter-defendants have justified their criminal and tortuous activity as Pastor Lindstedt defaming them in Church Internet property, hence their filing fraudulent DMCA take-down notices and the dismissed federal litigation and now this Ohio Court case, absent jurisdiction. However, the traditional defense of "defamation" and "slander" and "libel" has always been whether or not the truth has been said. This while Bryan Reo and Reo's co-conspirator co-counter-defendants have knowingly falsely claimed that Pastor Lindstedt is a "convicted child molester" in the past and some of them still do so to this very day.

\* Bryan Reo is an Anti-Racist Activist who is obviously not of pure Aryan Christian Israelite stock. When Pastor Lindstedt found Bryan Reo's public Facebook profile picture and published it along with Reo's past history, Reo took down a dozen or so of Pastor Lindstedt's Church's web pages by fraudulently abusing the DMCA. Bryan Reo simply isn't White.

\* Bryan Reo did try to get Pastor Lindstedt gunned down by US Marshalls

\* Bryan Reo did blackmail a quarter-breed Choctaw Indian known as "Victor Switzer" of Pine Bluff Arkansas in order to gain homosexual favors for Reo.

\* Bryan Reo threatened to murder an 86-year-old woman in a wheelchair with a spear.

\* Insofar as "jews who practice 'papist-preterism'" are concerned, Pastor Lindstedt doubts that 666 of 667 non-practicing non-pretending See-Eye Dentists would know what one is even after Bryan Reo's co-conspirator co-counter-defendants William Finck / Concubine Melissa Epperson or "Pastor" Eli James or Joseph November or Joseph Kutz or Joseph Putz or whatever its name is this week were to walk up, introduce theysselves as such and then bite them on the ass.



\* Bryan Reo has committed fraud and perjury by making a false police report to the Lake County Sheriff's Department concerning a public Lexis-Nexis document which was provided by John Britton's lawyer Stuart McCarty in retaliation for Bryan Reo's failed homosexual blackmail of Reo's co-conspirator co-counter-defendant John Britton and then Reo's conspiring with Rolls Royce attorneys to have John Britton's federal lawsuit concerning a helicopter crash dismissed. John Britton then e-mailed Pastor Lindstedt with the pdf file and Lindstedt kept mum. However, one Russell Walker got a copy of this pdf file and sent a copy to Bryan Reo and around 35-40 other retards on Walker's retard e-mail list. Pastor Lindstedt is going to present an Affidavit to this Court and the US District Courts and US Attorneys in Ohio and Missouri that Bryan Reo has deliberately committed perjury by correctly naming Russell Walker as the one who posted publicly this quasi-public document in Reo's fraudulent Lake County Sheriff's Department police complaint of March 7, 2011 but lied in Reo's civil complaints to these courts. Bryan Reo had called into Pastor Lindstedt's "Movement Turd" Talkshoe Show off Nov. 28, 2010 and called Pastor Lindstedt a child molester and incited John Britton to shoot Reo if Reo came to Emmet Idaho after previously threatening to rape Britton's wife and daughters. Reo then covered his tracks by having that show taken down from Talkshoe, and then the entire series as well. However, nothing once said on the Internet is ever forgotten or goes away forever and Pastor Lindstedt has presented this audio recording for both the federal and state courts.

However, Bryan Reo has committed felony perjury to the U.S. District Courts of the Northern District of Ohio, to Federal judge James Guin, and to the U.S. District Court of the Western District of Missouri and to U.S. Magistrate Judge Matthew Whitworth by claiming that Pastor Lindstedt posted this public record illegally. Even more to the point, by making this false police report to the Lake County Sheriff's Department and to this Lake County Ohio Court, Bryan Reo has committed felony perjury re Ohio Revised Statute 2921.11, Perjury. Pastor Lindstedt shall present an Affidavit to that regard as an exhibit, and present it not only to this Court, but the federal courts and US Attorneys, and indeed all others of Bryan Reo's victims.

Bryan Reo, a non-white Anti-Racist Activist pretended to be a Christian Identity sub-pastor and racial soldier of White Supremacy. When Pastor Lindstedt revealed Reo's pictures and past activity pretending to be a "White Supremacist" Bryan Reo and Reo's co-conspirator co-counter-defendants went on a tear taking down Pastor Lindstedt's Church's web pages under color of the Digital Millennium Copyright Act (DMCA) and by tortuously interfering with these

Internet Service Providers and Lindstedt's Church's contracts for service. When Pastor Lindstedt found a "free-speech" hosting on CrisisHost.com, Bryan Reo threatened the CrisisHost operator with a fraudulent lawsuit (#14) in this Lake County Ohio Court. Thus Bryan Reo and Reo's co-conspirator co-counter-defendants have engaged in not only perjury, but extortion, wire-fraud, and violation of federal conspiracy and racketeering laws.

Bryan Reo's civil complaint is "simple, concise, and direct" perjury and fraud. Making an Answer and Counter-Complaint to nine pages of Reo's fraud took Pastor Lindstedt and Lindstedt's Church thirty-eight pages. As Mark Twain once wrote, lies can travel half-way across the world before the Truth can get out of bed and put on its shoes.

This Lake County Court really has no jurisdiction to hear this case because Bryan Reo already had it dismissed as frivolous and baseless before the U.S. District Courts in Ohio and Missouri. Additionally, Reo's case is no longer actionable because of O.R.S. § 2305.03 and 2305.11. However, even if Bryan Reo hadn't already struck out in federal court and this supposed "defamation, libel, and slander" had occurred within the previous year, Defendants Lindstedt and Church would have as a defense that they have been telling the truth about Bryan Reo and Reo's co-conspirator co-counter-defendants while Reo and co-counter-defendants have been deliberately knowingly defaming Pastor Lindstedt by calling him a "convicted child molester" and also committing fraud and perjury by taking down this prior defamation, libel and slander so that Reo may pursue fraudulent and frivolous litigation in first the federal courts and now in Lake County Ohio for purposes of fraud and harassment.

## II. LAW & ARGUMENT

This Ohio Court in general and this particular judge has seen dozens or maybe even hundreds of these Bryan Reo Motions to Strike for whatever reason. In the Hiram Reppert case, Reo was asking that the defense motions of the attorneys working for the Ohio Attorney General be stricken according to Bryan Reo's inventive whining reasons of "Reo-fact" and "Reo-law". In Bryan Reo's bogus and fraudulent federal case, Bryan Reo asked the federal judge to strike Pastor Lindstedt's Answer(s) twice, and yet it wasn't until Pastor Lindstedt simply joindered Reo's co-conspirator co-counter-defendants and proceeded to counter-sue them all that the federal judge figured out that Reo's bogus and frivolous litigation lacked all merit. Presently, Pastor Lindstedt will file an appeal before the 8<sup>th</sup> Circuit that this case be re-instated but with



Pastor Lindstedt and Lindstedt's Church as Plaintiffs and Reo and Reo's co-conspirator co-counter-defendants as defendants and that they pay the full penalties both civilly and criminally for destroying Church religious intellectual property. Thus this case will be pulled out of Lake County Ohio and back to Missouri for Pastor Lindstedt to finish what Bryan Reo started.

The Ohio Rules of Civil Procedure keep litigation from being bogged down as in the Missouri federal and state courts. However the virtue of the Missouri federal and state court rules is that they require litigants who are making a civil complaint to verify their complaints and affidavits. In Missouri, Bryan Reo would be in prison and/or paying horrendous court costs as opposed to being able to file thirty of them in a local state court seeking money through fraudulent frivolous pleadings, as Reo has been able to do before the Lake County Courts. Bryan Reo literally files two cases in one day or three in a week. There is no way in which a jury will ratify this obvious abuse of legal process.

Insofar as Bryan Reo's claim to an "affront to Plaintiff's due process rights as guaranteed to Plaintiff via the Fourteenth Amendment to the United States Constitution" whatever happened to Bryan Reo's demand that this Lake County Ohio Court issue a "gag order" against Pastor Lindstedt and Lindstedt's Church in Reo's initial civil complaint? U.S. Magistrate Judge Matthew J. Whitworth said at the Scheduling Conference of Feb. 13<sup>th</sup> 2015 that he wasn't going to issue any gag order on Pastor Lindstedt's reporting of the ongoing federal case. Yet the only thing which qualifies for this bogus litigation of Bryan Reo's contrary to the Ohio Statute of Limitations is the supposed "defamation" of Pastor Lindstedt's posting on the Church's web page the very opposing motions that forced the federal judge to dismiss Reo's fraudulent litigation at the federal level. Bryan Reo seems to have a rather narcissistic "Social Justice Warrior / Anti-Racist Activist" view that the U.S. Constitution gives him "a right" to take down the web pages of the traditional Christian Identity pastors and their Churches that say that obvious mongrels and jews pretending to be Aryan Christian Israelites are forbidden by Deuteronomy 23:2 from infesting Aryan C.I. Congregations. And that Bryan Reo and Reo's co-conspirator co-counter-defendants can say that Pastor Lindstedt is not only a child molester, but a convicted child molester no less, but when they want to sue for libel and slander and defamation that all they have to do is to take down their knowing lies from their web page and then sue. And that when they do sue that they can demand that defendants' answers that they don't like be stricken for whatever reason, and that when they lose at the federal level that they

can re-file their dismissed case at the local county court over 900 miles away for the harassment of defendants.

Bryan Reo doesn't want a jury trial to take place in Lake County Ohio for \$25,000 in mythical damages where Reo has filed thirty bogus cases any more than Bryan Reo wanted a jury trial for defamation for \$10.75 million before a working class largely white federal jury in Springfield Missouri. The whole purpose of Bryan Reo litigation is to file bogus fraudulent motions asking for summary judgment because Bryan Reo can file these motions and not be sent to prison for fraud. Remedial action by this Lake County Ohio Court in putting an end to this endless altogether fraudulent Bryan Reo litigation whose only purpose is to harass and defraud others is, therefore, just and proper – and long overdue.

### III. CONCLUSION

For the reasons set forth herein, this Honorable Court should dismiss with prejudice Plaintiff Bryan Reo's deliberately fraudulent bogus litigation against Pastor Lindstedt and the assets of Pastor Lindstedt's Church as this Court has no jurisdiction because Bryan Reo's previous fraudulent and bogus litigation in both the U.S. District Courts of the Northern District of Ohio and the Western District of Missouri were dismissed on September 10, 2015 and Bryan Reo immediately went running to this Lake County Court of Common Pleas to file largely the same crap which failed on September 18, 2015. Also Ohio Revised Code § 2305.03 and 2305.11 concerning the Statute of Limitations presents a bar to additional fraudulent Bryan Reo litigation before this Court. The only thing which is timely as in the past year is Pastor Lindstedt publishing on a Church web site the very motions countering Bryan Reo lies which ended in Reo's case being dismissed, and this material is a matter of public record. Bryan Reo has been proven to be gloating to Reo's fellow co-conspirator co-counter-defendants as well as the entire world on Aug. 25, 2014 in a forum owned and operated by Reo's co-conspirator co-counter-defendant William Raymond Finck, Jr. that the entire reason for Reo's bogus federal lawsuit was to render Pastor Lindstedt destitute and penniless and to destroy Pastor Lindstedt's Church. Given Bryan Reo's already petitioning this Court for an illegal "gag order" in Reo's civil complaint, there is no way in hell or above that Bryan Reo will prevail in this matter. Therefore, this case should be dismissed with prejudice and let Pastor Lindstedt pursue his federal appeal



and further litigation at the federal level against Bryan Reo and Reo's co-conspirator co-counter-defendants without distraction in Lake County.

However, this Court does have jurisdiction to sanction Bryan Reo by summarily awarding Pastor Lindstedt and Lindstedt's Church the full amount fraudulently sought by Bryan Reo of \$25,000 plus other penalties that this Court deems just and equitable for Plaintiff having filed a fraudulent and frivolous court case that is an affront to the dignity of the Lake County Court of Common Pleas and the State of Ohio as well as the First Amendment rights of Pastor Lindstedt and Pastor Lindstedt's Church of Jesus Christ Christian / Aryan Nations of Missouri.

Next to next to lastly, this Court should consider requiring Bryan Reo to henceforth post a fraud and perjury bond in the amount of \$5,000 before allowing Bryan Reo to post fraudulent and bogus civil litigation for the otherwise inevitable Cases #31 through 666 should an inevitable dismissal be issued against professional frivolous and malicious and vexatious litigant Bryan Reo. (Bryan Reo already has thirty cases outstanding and almost all of them dismissed or closed already because they were groundless. This one is #27 of 30 so far.)

And next to lastly, Pastor Lindstedt presents an Affidavit proving that Bryan Reo deliberately filed a false police report to the Lake County Sheriff's Department on March 7, 2011, thus admitting that Russell Walker was the one who published this public record Lexis-Nexus pdf document concerning Bryan Reo that Walker got from John Britton's lawyer Stu McCarty in retaliation for Bryan Reo insinuating himself into John Britton's lawsuit, and that thus Bryan Reo has knowingly lied to this Court, as well as the federal district courts of Ohio and Missouri that it was Pastor Lindstedt who published this public document concerning Bryan Reo available to those with a subscription or access to a college law library. Upon receipt, may this Court present a Writ of Mandamus /Arrest Warrant to the Lake County Sheriff's Department to promptly arrest Bryan Reo for filing a false police report and thus a felony in the third degree violation of Ohio Revised Code § 2921.11 – Perjury. Bryan Reo is to go directly to jail. Not allowed to collect \$200 or 200 cents. Upon inevitable conviction, all Bryan Reo cases are to be dismissed and all those defrauded by Bryan Reo are to be made whole by restitution.

Lastly Saint Hiram of Reppert should be granted a commendation by this Court for saving "That Mistake By The Lake" of Cleveland, Ohio along with Lake County from glowing in the dark. One righteous man, Saint Hiram of Reppert did a far better job of saving Cleveland

and Lake County Ohio than Father Abraham did in saving Sodom and Gomorrah because of the crimes of vicious addle pated miscegenated homosexuals like uh . . . well, never mind.

Hail Victory !!!

*Martin L. Lindstedt*  
Pastor Martin Luther Dzerzhinsky Lindstedt, ArchBishop  
The Church of Jesus Christ Christian / Aryan Nations of Missouri  
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Granby Missouri 64844  
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(E-mail address): pastorlindstedt@gmail.com  
(E-mail address for Reo who has threatened to terminate above e-mail address):  
johnrelnet@gmail.com  
*Defendant(s) / Counter-Claimant(s)*

CC: **Exhibit #1**, Affidavit concerning Bryan Reo filing a fraudulent police report to the Lake County Sheriff's Department on March 7, 2011 admitting that Russell Walker published a Lexis-Nexis file given Walker in retaliation by John Britton's lawyer because of Bryan Reo interference in John Britton's federal case, but yet lying to two federal district court judges and to the Lake County District Court that Pastor Martin Lindstedt did this.  
**Exhibit #2**: Bryan Reo's fraudulent Lake County Police Report of March 7, 2011  
**Exhibit #3**: Bryan Reo's fraudulent federal exhibit regarding above matter in Reo's civil complaint, now dismissed.

#### CERTIFICATE OF SERVICE

I, Pastor Martin Lindstedt, do hereby certify that a true and genuine copy of this Motion along with Affidavit/Exhibits has been dispatched by U.S. regular mail, postage prepaid to the Plaintiff/Counter-Defendant on Saturday Nov. 7, 2015 living at address:

Bryan Anthony Reo  
7143 Rippling Brook Lane  
Mentor, Ohio 44060

*- M.L. Lindstedt*

This filing with affidavit shall also be sent at discretion to the relevant US Attorneys of Ohio and Missouri, the Ohio Attorney General's Office and Lake County Sheriff's Department for possible criminal prosecution of Bryan Reo and Reo's co-conspirator co-counter-defendants and placed upon Pastor Lindstedt's Church's web page(s) for public scrutiny.