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

BRYAN ANTHONY REO, Plaintiff, v. **MARTIN LINDSTEDT,** Defendant.	Case No. 15CV001590 Case No. 16CV000825 Hon. Richard L. Collins PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT AGAINST DEFENDANT MARTIN LINDSTEDT AND CHURCH

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PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT AGAINST DEFENDANT MARTIN LINDSTEDT AND CHURCH

NOW COMES Bryan Anthony Reo ("Plaintiff"), Pro Se, and hereby propounds upon this Honorable Court, Martin Lindstedt ("Lindstedt") and Church of Jesus Christ Christian Aryan Nations of Missouri ("Church") Plaintiff's Motion for Summary Judgment Against Defendants Lindstedt and Church. For the reasons that follow, Plaintiff should be granted summary judgment on all of his claims against Defendant Martin Lindstedt.

Respectfully submitted

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PLAINTIFF IS CLEARLY ENTITLED TO JUDGMENT AS A MATTER OF LAW ON EACH CLAIM AS DEMONSTRATED BELOW BASED ON THE NON-EXISTENCE OF ANY GENUINE DISPUTE AS TO A MATERIAL FACT.

The standard in Ohio for the granting of summary judgment is detailed in *Grafton v. Ohio Edison Co.*, 671 N.E.2d 241 (1996). Where the court held,

> In order to obtain summary judgment, the movant must show that (1) there is no genuine issue of material fact; (2) the moving party is entitled to judgment as a matter of law; and (3) it appears from the evidence that reasonable minds can come to but one conclusion when viewing evidence in favor of the nonmoving party, and that conclusion is adverse to the nonmoving party. (citing) *State ex rel. Cassels v. Dayton City School Dist. Bd. of Edn.*, 631 N.E.2d 150, 152 (1994).. *Id.* at 245.

PLAINTIFF HAS CLEARLY ESTABLISHED THE ELEMENTS FOR A CLAIM OF DEFAMATION AND NO REASONABLE TRIER OF FACT COULD CONCLUDE OTHERWISE.

Counts I and Count VII of the Complaint of 15CV001590 are for common law defamation. In *Gosden v. Louis*, 116 Ohio App.3d 195, 687 N.E.2d 481 (9th App. Dist, 1996) the court detailed that a claim for defamation has the following elements-

(1) false and defamatory statement, (2) about plaintiff, (3) published without privilege to a third party, (4) with fault of at least negligence on part of defendant, and (5) that was either defamatory per se or caused special harm to plaintiff.

Defendant Lindstedt published in 2016 that Plaintiff was in a homosexual "ass to mouth" relationship with Plaintiff's employer, Attorney Kyle Bristow. Lindstedt published this on his Church of Jesus Christ Christian Aryan Nations of Missouri website http://christian-identity.net/forum/showthread.php?1639-Bryan-Reo-s-Fraudulent-amp-Perjurous-Stalking-Complaint-against-Pastor-Lindstedt-16CS000102&p=14091#post14091 which is mirrored at www.whitenationalist.org . The written post is clearly about the Plaintiff Reo as it refers to Plaintiff by name, contains Plaintiff's picture, and a reference to "Kyle Bristow's law clerk" and Bryan Reo is the only law clerk who works for Kyle Bristow. [see Exhibit 1 a publication Defendant made on Defendant's website claiming Plaintiff has "ass to mouth" sex with Plaintiff's employer]

Plaintiff is not in a homosexual relationship, be it "ass to mouth" or any homosexual variety, with Plaintiff's employer Kyle Bristow or with anybody. Plaintiff is not a homosexual. It is inherently injurious to Plaintiff's reputation claim that Plaintiff is so unprofessional that he has sexual relations with his employer when it is not true

Defendant also posted on his website that Plaintiff is a "catamite" <http://christian-identity.net/forum/showthread.php?1643-Reo-Bryan-Anthony-vs-.-Callvation-LLC-Case-16CV000331> on February 23, 2016, at 10:27 p.m. that Plaintiff is a "catamite." Webster's defines "catamite" as a boy kept by a pederast who plays the subservient and feminine roll in homosexual sex acts. Plaintiff is not a homosexual, let alone who plays the subservient and feminine roll in a homosexual. It is inherently injurious to Plaintiff's reputation to call him a homosexual and to claim that Plaintiff participates in a relationship as a catamite.

Throughout 2013, 2014, 2015, and 2016, Lindstedt posted to his website that Plaintiff Reo was engaged in "barratry," "fraud," "vexatious litigation," "fraud in civil litigation," and "perjury." These are all either accusations of criminal conduct or unprofessional conduct, all of which serve as the basis for Plaintiff having claims against Defendant Lindstedt for libel per se. [see Exhibit 2 where Defendant Lindstedt libels Plaintiff by claiming Plaintiff was engaged in fraud]

Writing that accuses person of committing crime is libelous per se. *Gosden v Louis*, 116 Ohio App.3d 195, 687 N.E.2d 481 (9th App. Dist, 1996).

Lindstedt made statements about Plaintiff that are libel per se by accusing Plaintiff of committing the crimes of fraud and perjury. Fraud is a crime in Ohio, R.C. 2913.01. Perjury is a crime in Ohio, R.C. 2921.11 [see Exhibit 3 where Defendant Lindstedt libels Plaintiff by claiming Plaintiff engaged in perjury to obtain a civil protection order against Defendant]

Lindstedt claimed Plaintiff was engaged in unauthorized practice of law which is a violation of R.C. 4705.07 [see Exhibit 4 where Lindstedt makes this accusation]

On April 6, 2014 Lindstedt posted on his website that Plaintiff had "murdered Catherine Williams," a woman who was killed in a car accident in South Carolina in 2006, in an act of insurance fraud in a car accident that Defendant alleged Plaintiff purposefully caused. Murder is a crime in Ohio, R.C. 2903.02. Plaintiff did not murder or otherwise cause the death of Mrs. Williams. Plaintiff was not even in South Carolina once during 2006 when Mrs. Williams died. [See Exhibit 5 where Lindstedt published this accusation on his website and mailed copies to various businesses across the USA http://www.whitenationalist.org/forum/archive/index.php?t-892.html&s=87cea72fc66f1ad69aacf1c373013894]

Written matter is libelous per se if, on its face, it reflects upon person's character in manner that will cause him to be ridiculed, hated, or held in contempt, or in manner that will injure him in his trade or profession. *Gosden v Louis*, 116 Ohio App.3d 195, 687 N.E.2d 481 (9th App. Dist, 1996)

Lindstedt has admitted to being the owner, operator, and originator of the content on this website in the pleadings as he signs each document with the website address in the signature line and he has filed a counter-claim against Plaintiff for allegedly "interfering" in the operation of his website. Lindstedt's ownership of the website and control over the content of the website can also be established by virtue of the fact that he posts pleadings on the website and includes a mention of this in each certificate of service when he claims he has is doing service by "posting on his website." www.christian-identity.net/forum, www.whitenationalist.org, and www.pastorlindstedt.org.

Lindstedt has never denied any of the factual allegations regarding the communications he has made about Plaintiff but has instead relied upon the completely insufficient legal theory that he has "First Amendment rights to free speech" that cover his speech and his publications on his website (see Defendants Amended Answer And Counter-Claim as Ordered p.1 dated 1/7/2016)

Lindstedt admits that he made the declaration that Plaintiff was a "homosexual drug-dealing con-man, murderer, pawn store owner, and a pimp" but then offers as the defense the notion that the defendant believed his own statements were true when they were made and today. [see Defendants Amended Answer And Counter-Claim as Ordered p.24 dated 1/7/2016]

Defendant's purported belief in the defamatory statement is not a legally sufficient defense to a claim of defamation or libel per se. See *Gray v. Allison Division, General Motors Corp.*, 52 Ohio App.2d 348, 370 N.E.2d 747 (8th App. Dist. 1977) where the court held, "Asserted belief of defendant in defamation action in truth of allegedly defamatory charge is no defense."

Lindstedt has never had any privilege to make any of the publications about Plaintiff [see Plaintiff's affidavit], and none of the accusations about Plaintiff are true [see Plaintiff's affidavit]. Plaintiff has never committed fraud, perjury, barratry, unauthorized practice of law,

and has never engaged in homosexual conduct nor had sexual relations with any employer [see Plaintiff's affidavit].

The statements made by Lindstedt consisted of accusations that constitute libel per se and thus damages are presumed.

At common law, once plaintiff proved that material was defamatory per se, he was entitled to recover presumed damages, as proof of defamation itself established existence of some damages. *Gosden v Louis*, 116 Ohio App.3d 195, 687 N.E.2d 481 (9th App. Dist, 1996)

Plaintiff is not required to prove that Defendant knew the statements were false or that defendant acted with reckless disregard as to the truth of the statements.

Where defamation action is between private individuals who were not involved in public matter, plaintiff is not required under First Amendment to prove knowledge of falsity or reckless disregard for truth in order to recover presumed damages for statement that is defamatory per se. *Gosden v Louis*, 116 Ohio App.3d 195, 687 N.E.2d 481 (9th App. Dist, 1996)

Defendant was at least negligent in his publication of the statements although the frequency, nature, and ongoing basis of publication of new false accusation after false accusation, combined with repeatedly using racial slurs to describe Plaintiff [see Exhibit 6] make it clear that Defendant acted with common law malice.

"Type of malice which must be shown for private individual not involved in matter of public concern to recover punitive damages in defamation action is common law express malice, which consists of ill-will, vengefulness, hatred, or reckless disregard of plaintiffs' rights." *Gosden v Louis*, 116 Ohio App.3d 195, 687 N.E.2d 481 (9th App. Dist, 1996)

PLAINTIFF HAS CLEARLY ESTABLISHED THE ELEMENTS FOR A CLAIM OF INVASION OF PRIVACY FALSE LIGHT AND NO REASONABLE TRIER OF FACT COULD CONCLUDE OTHERWISE.

Counts II and VIII of the Complaint of 15CV001590 are for common law invasion of privacy false light. In *Welling v. Weinfeld,* 113 Ohio St.3d 464, 866 N.E.2d 1051 (2007) the court detailed that a claim for invasion of privacy false light has the following elements-

(1) the false light in which the other was placed would be highly offensive to a reasonable person, and (2) the actor had knowledge of or acted in reckless disregard as to the falsity of the publicized matter and the false light in which the other would be placed.

In 2016 Lindstedt published on his website that Plaintiff had been working at the Perry Nuclear Power Plant and had been fired when it was discovered that Plaintiff was planning an attack to cause a major nuclear incident at the Perry Nuclear Power Plant for the purpose of killing large numbers of nearby residents. The light that Defendant placed Plaintiff in was absolutely false and placing Plaintiff falsely in the light of attempting to damage the reactor core of the power plant and kill thousands of people based would result in Plaintiff being in light highly offensive to a reasonable person.

Lindstedt had no reasonable basis for believing that the accusation had any measure of truth given that Plaintiff Reo had been working at the Perry Nuclear Power Plant in 2012, his employment was terminated in 2012 for reasons completely unrelated to Defendant's accusations, and Plaintiff was never indicted let alone arrested, things that would certainly have happened in Plaintiff had been planning a terrorist event viz a viz the nuclear power plant. [see Exhibit 6 where Lindstedt made this publication]

Lindstedt had absolutely no actual knowledge as to why Plaintiff's employment with the Perry Nuclear Power Plant ended; he simply made up a [false] reason out of a desire to maliciously injure the Plaintiff by disseminating that false reason and casting Plaintiff in a false light. Plaintiff's employment with the Perry Nuclear Power Plant did not end for any reason even remotely approaching the reason Defendant stated. [see Plaintiff's affidavit]

In 2014 Lindstedt published on his website, and mailed to various businesses in the USA, that Plaintiff Bryan Reo of Mentor, Ohio was the Bryan Reo of South Carolina who caused a fatal car accident in South Carolina in 2006 in which, a woman, Catherine Williams died. Lindstedt accused Plaintiff Bryan Reo of being the man who caused the car accident and of having done so for the purpose of "murder" and "insurance fraud."

Plaintiff not only did not cause that accident for the purpose of murder and insurance fraud, Plaintiff Bryan Reo of Mentor, Ohio was not even the Bryan Reo who caused that accident. Plaintiff Bryan Reo of Mentor, Ohio was not even in South Carolina once during the year of 2006. [see Plaintiff's affidavit]

During the status conference held telephonically on December 17, 2015 Lindstedt declared that he never had any idea whether or not Bryan Reo of Mentor Ohio was the same Bryan Reo who caused the fatal car accident in South Carolina in 2006 but that he had a First Amendment right to claim it anyway. [See Exhibit 5 where Lindstedt published this accusation of murder and insurance fraud on his website]

Placing Plaintiff falsely in the light of being involved in an insurance fraud based murder would result in Plaintiff being in light highly offensive to a reasonable person. Defendant had a clear reckless disregard for the truth and had no good faith basis to believe the truth of his own accusation.

PLAINTIFF HAS CLEARLY ESTABLISHED THE ELEMENTS FOR A CLAIM OF INVASION OF PRIVACY VIA PUBLIC DISCLOSURE OF PRIVATE FACTS AND NO REASONABLE TRIER OF FACT COULD CONCLUDE OTHERWISE.

Count III of the Complaint of 15CV001590 is for common law invasion of privacy via public disclosure of private facts. In *Bertsch v. Communications Workers of Am., Local 4302,* 101 Ohio App.3d 186, 655 N.E.2d 234 (9th App. Dist. 1995) the court held that-

> In Ohio, the tort of invasion of privacy consists of any of the following: "the unwarranted appropriation or exploitation of one's personality, the publicizing of one's private affairs with which the public has no legitimate concern, or the wrongful intrusion into one's private activities in such a manner as to outrage or cause mental suffering, shame or humiliation to a person of ordinary sensibilities

Defendant published Plaintiff's voter registration information, vehicle VIN number, vehicle license plate, vehicle make/model, and social security number onto the internet. These are all private affairs with which the public has no legitimate concern. Defendant published the actual [correct] first five digits of Plaintiff's social security number and what Defendant believed to be the last four digits of the Plaintiff's social security number. Defendant's publication is attached as Exhibit 7.

The public has absolutely no legitimate concern in any of the information Defendant published onto the internet regarding Plaintiff's private affairs.

PLAINTIFF HAS CLEARLY ESTABLISHED THE ELEMENTS FOR A CLAIM OF INVASION OF PRIVACY VIA INVASION OF SECLUSION AND NO REASONABLE TRIER OF FACT COULD CONCLUDE OTHERWISE.

Count IV of the Complaint of 15CV001590 is for common law invasion of privacy via invasion/intrusion of seclusion. In *Housh v. Peth,* 165 Ohio St. 35, 133 N.E.2d 340 (1956) the court held that-

> The right of privacy is the right of a person to be let alone, to be free from unwarranted publicity, and to live without unwarranted interference by the public in matters with which the public is not necessarily concerned.
>
> An actionable invasion of the right of privacy is the unwarranted appropriation or exploitation of one's personality, the publicizing of one's private affairs with which the public has no legitimate concern, or the wrongful intrusion into one's private activities in such a manner as to outrage or cause mental suffering, shame or humiliation to a person of ordinary sensibilities.

Defendant has wrongfully appropriated Plaintiff's personality by using Plaintiff's name, picture, and address in an association with an account that Defendant created and uses to post content on Defendant's website while attaching Plaintiff's names to the posts in such a manner that an average or reasonable reader would reasonably conclude originated from Plaintiff. Attaching Plaintiff's name and personality to posts that advocate white supremacy, child molestation, communism, fascism, mass murder, and appear to advocate all other manner of disgusting and repugnant ideas causes an unwarranted interference by the public with Plaintiff's right to be left alone and to be free from unwarranted publicity.

PLAINTIFF HAS CLEARLY ESTABLISHED HIS ENTITLEMENT TO PUNITIVE DAMAGES BASED ON DEFENDANT'S MALICIOUS CONDUCT AND NO REASONABLE TRIER OF FACT COULD FAIL TO CONCLUDE DEFENANT ACTED WITH COMMON LAW MALICE.

Count V of the Complaint of 15CV001590 is for punitive damages. In *Gosden v. Louis*, 116 Ohio App.3d 195, 687 N.E.2d 481 (9th App. Dist, 1996) the court held that-

> Type of malice which must be shown for private individual not involved in matter of public concern to recover punitive damages in defamation action is common law express malice, which consists of ill-will, vengefulness, hatred, or reckless disregard of plaintiffs' rights.

Further in Gosden the Court held that the "actual malice" standard is not the same as defined in New York Times v. Sullivan.

> The trial court instructed the jury that it could award punitive damages to plaintiffs only if it found the *New York Times* type of "actual malice," that is, knowledge of falsity or reckless disregard for the truth. In a purely private defamation case, however, common-law "express" malice (ill-will,

> hatred, etc.) remains the standard. *Malone v. Courtyard by Marriott L.P., supra.* Plaintiffs' fourth assignment of error is sustained.
>
> Gosden v. Louis at 492.

The frequency, nature, and ongoing basis of publication of new false accusation after false accusation, combined with repeatedly using racial slurs to describe Plaintiff [see Exhibit 6] make it clear that Defendant acted with common law malice. Defendant clearly acted with a purpose to maliciously injuring and damaging the Plaintiff's reputation or at least had a reckless disregard of Plaintiff's rights. The words Defendant has communicated about Plaintiff essentially speak for themselves and clearly evince Defendant's vengeful ill-will and hatred towards Plaintiff.

Defendant's ill-will and hatred of Plaintiff is clearly demonstrated by the fact that Defendant solicited Plaintiff's murder on the internet and Plaintiff was able to obtain a Civil Protection Order against Defendant based on Defendant threatening to have Plaintiff killed and threatening to directly kill Plaintiff. See 16CS000102, wherein Plaintiff Reo was the Petitioner and was granted a Civil Protection Order against Defendant which was issued March 7, 2016 and is valid through January 19, 2019. The ruling of Judge Culotta granting the Civil Protection Order is attached as Exhibit 8.

PLAINTIFF HAS CLEARLY ESTABLISHED HIS ENTITLEMENT TO THE GRANTING OF A PERMANENT INJUNCTION AGAINST DEFENDANT REQUIRING DEFENDANT TO REMOVE AND NOT REPUBLISH ANY AND ALL DEROGATORY MATERIALS DEFENDANT OR DEFENANT'S AGENTS HAVE PUBLISHED ON THE WORLD WIDE WEB ABOUT PLAINTIFF.

Count VI of the Complaint of 15CV001590 is for a permanent injunction. In *AultCare Corp. v. Roach*, 2009 WL 4023210, 2009-Ohio-6186 (5th App. Dist.) the court detailed the requirements for the grant of a preliminary injunction-

> A party seeking a preliminary injunction bears the burden of establishing, by clear and convincing evidence, that "(1) there is a substantial likelihood that the plaintiff will prevail on the merits; (2) the plaintiff will suffer irreparable injury if the injunction is not granted; (3) no third parties will be unjustifiably harmed if the injunction is granted; and (4) the public interest will be served by the injunction."

The court went on to detail the only difference between obtaining a preliminary injunction and a permanent injunction. "The test for the granting or denial of a permanent injunction is substantially the same as that for a preliminary injunction, except instead of the plaintiff proving a 'substantial likelihood' of prevailing on the merits, the plaintiff must prove that he *has* prevailed on the merits." *AultCare Corp.* at 8.

If this court grants any part of the instant motion then Plaintiff will have prevailed on the merits for purposes of the grant of a permanent injunction. It is obvious that Plaintiff will suffer irreparable injury if the injunction is not granted and if Defendant is permitted to continue publishing defamatory content pertaining to Plaintiff and is not required to remove content already published. No third parties will be unjustifiably harmed by the grant of the injunction because the injunction would only require Defendant to cease publication of defamatory content pertaining to Plaintiff and remove all defamatory content under Defendant's control of control of Defendant's agents that has been published on the world wide web. Public interests will be served by requiring Defendant to cease publishing defamatory content pertaining to Plaintiff and to remove defamatory content already published because the public has an interest in an internet that is as free from falsehoods as possible and it serves absolutely no interest to permit Defendant to libel Plaintiff on the internet.

PLAINTIFF HAS CLEARLY ESTABLISHED THE ELEMENTS FOR COUNTS I AND II OF THE 16CV000825 CASE AND NO REASONABLE TRIER OF FACT COULD CONCLUDE OTHERWISE.

Counts I and II of the Complaint of 16CV000825 have been proven with the exhibits attached for Counts I, II, III, and IV of 15CV001590 and with Plaintiff's Affidavit and Plaintiff's Requests for Admissions Propounded Upon Defendant.

PLAINTIFF HAS CLEARLY ESTABLISHED THE ELEMENTS FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AND NO REASONABLE TRIER OF FACT COULD CONLUDE OTHERWISE.

Count IX of the Complaint of 16CV000825 is for common law intentional infliction of emotional distress. In *Kovacs v. Bauer*, 118 Ohio App.3d 591, 693 N.E.2d 1091 (8th App. Dist, 1996) the court detailed that a claim for intentional infliction of emotional distress has the following elements-

(1) actor either intended to cause emotional distress or knew that actions taken would result in serious emotional distress to plaintiff; (2) actor's conduct was so extreme and outrageous as to go beyond all possible bounds of decency; (3) actor's actions were proximate cause of plaintiff's psychic injury; and (4) mental anguish suffered by plaintiff was serious.

Defendant Lindstedt solicited Plaintiff's murder and declared that Plaintiff should be killed and that a monetary reward would be paid to whosoever would kill Plaintiff. Based on Defendant's criminal conduct against Plaintiff, which was determined to be menacing by stalking in violation of R.C. 2901.211 and which resulted in the grant of a civil protection order in favor of Plaintiff against Defendant [see Exhibit 8 with the Civil Protection Order], Plaintiff suffered extreme mental anguish.

Undertaking conduct that consists of publicly soliciting the murder of Plaintiff could only have been done with the intention or knowledge that it would result in serious emotional distress to the Plaintiff.

If the conduct of Defendant in publicly soliciting the murder of Plaintiff is not so extreme and outrageous as to go beyond all possible bounds of decency then nothing could ever qualify.

The Defendant's conduct directly, proximately, and actually caused Plaintiff's psychic injury. Plaintiff was distraught enough to seek the assistance of law enforcement, to file a police report, and to petition for a civil protection order [a petition that was granted- Exhibit 8].

The mental anguish suffered by the Plaintiff was severe and extreme. No reasonable man could be expected to have to endure another individual actively soliciting his murder. Defendant's own declarations and internet broadcasts during the relevant time show that he declared he hoped he was making the Plaintiff homicidal and suicidal and he hoped Plaintiff would "go out like Adam Lanza" who was the shooter who attacked the Sandy Hook Elementary School. [See attached Exhibit 9 which is a post from Defendant's website showing his vile intentions]

PLAINTIFF HAS CLEARLY ESTABLISHED THE ELEMENTS FOR STATUTORY CRIMINAL LIABILITY AND NO REASONABLE TRIER OF FACT COULD CONLUDE OTHERWISE.

It constitutes a criminal act in the State of Ohio to solicit someone to commit a criminal offense. R.C. § 2923.03(A)(1). It constitutes a criminal act in the State of Ohio to

purposefully cause the death of another. R.C. § 2903.02(A). It constitutes a crime in the State of Ohio to engage in menacing by stalking R.C. § 2901.211. Plaintiff was granted a civil protection order against Defendant for Defendant's criminal conduct in soliciting the murder of Plaintiff and in committing menacing by stalking against Plaintiff. [see Exhibit 8 with the Civil Protection Order]

R.C. § 2307.60 provides that Plaintiff, as the victim of criminal actions perpetrated by Defendant, has a right to recover all damages in a civil action.

Because of Defendant's conduct against Plaintiff, Plaintiff is entitled to recover all damages including punitive damages which are clearly warranted in light of the outrageous nature of Defendant's crimes against Plaintiff.

PLAINTIFF HAS CLEARLY ESTABLISHED THE ELEMENTS OF ALL OF HIS CAUSES OF ACTION BASED ON THE ADMITTED REQUESTS FOR ADMISSIONS THAT DEFENDANT NEVER ANSWERED AND NEVER MOVED TO WITHDRAW.

On 12/15/2015 Plaintiff filed "Motion for Summary Judgment on All Claims" with an attachment showing Requests for Admission that Plaintiff had propounded upon Defendant. Defendant had never responded and was given leave by the court with which to respond to the Requests for Admissions. The deadline to respond having come and gone, without response, Plaintiff again moved for summary judgment on 1/11/2016 "Plaintiff's Motion for Summary Judgment" with relevant attachments, based on the requests which became admitted when not timely denied [they were never addressed at all in any fashion]. Defendant Lindstedt never moved to withdraw the admissions and Plaintiff is entitled to summary judgment on all claims on that basis as well as the reasons previously provided in this brief which demonstrate that no genuine dispute exists as to any material fact, no reasonable trier of fact could make any conclusion except one adverse to the non-moving party, and Plaintiff is entitled to judgment as a matter of law.

Accordingly summary judgment should be granted to Plaintiff on all of his claims against Lindstedt and Church and a hearing for damages should be scheduled.

Respectfully submitted

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Certificate of Service

I, Bryan Reo, do hereby certify that a true and genuine copy of the foregoing has been dispatched by United States regular mail, postage prepaid to the Defendants at:

Martin Lindstedt
338 Rabbit Track Road
Granby, Missouri 64844

Roxie Fausnaught
338 Rabbit Track Road
Granby, Missouri 64844

Church of Jesus Christ Christian/Aryan Nations of Missouri
338 Rabbit Track Road
Granby, Missouri 64844

On this 28 day of September. 2018

X Bryan Reo