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

BRYAN ANTHONY REO, Plaintiff, v. **THE CHURCH OF JESUS CHRIST CHRISTIAN/ARYAN NATIONS OF MISSOURI** c/o Roxie Fausnaught 338 Rabbit Track Rd. Granby, MO 64844 and **MARTIN LINDSTEDT** 338 Rabbit Track Rd. Granby, MO 64844 and **ROXIE FAUSNAUGHT** 338 Rabbit Track Rd. Granby, MO 64844 Defendants.	Case No. 15CV001590 Case No. 16CV000825 Hon. Richard L. Collins

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PLAINTIFF'S AMENDED COMPLAINT
JURY DEMAND ENDORSED HEREON

NOW COMES Bryan Anthony Reo ("Plaintiff"), *pro se*, and hereby propounds upon The Church of Jesus Christ Christian/Aryan Nations of Missouri ("Church"), Martin Lindstedt ("Lindstedt"), Roxie Fausnaught ("Fausnaught") (collectively "Defendants"), and this Honorable Court Plaintiff's Complaint:

I. INTRODUCTION

1. Plaintiff is suing Defendants for engaging in a vicious campaign of defamatory and criminal harassment against Plaintiff via the medium of the World Wide Web, which has become so severe that Plaintiff was awarded a civil stalking protection order against Lindstedt by the Lake County Court of Common Pleas after an evidentiary hearing.

II. PARTIES

2. Plaintiff is a natural person who resides in and is a citizen of the State of Ohio. Plaintiff is a private—and not a public—figure.

3. Church is a non-profit corporation existing by and through the law of the State of Missouri, which has Lindstedt as a director and Fausnaught as both a director and its registered agent.

4. Lindstedt is a natural person who resides in and is a domiciliary of the State of Missouri.

5. Fausnaught is a natural person who resides in and is a domiciliary of the State of Missouri.

III. JURISDICTION AND VENUE

6. This Court enjoys subject matter jurisdiction because Plaintiff seeks a money judgment against Defendants in an amount of money no greater than $15,000.00. R.C. § 1901.17.

7. This Court enjoys personal jurisdiction over Defendants because Defendants have intentionally caused tortious injury—via the medium of an interactive website on the World

Wide Web—to Plaintiff in the State of Ohio by an act outside the State of Ohio which Defendants might reasonably have expected would cause Plaintiff to be injured thereby in the State of Ohio. R.C. § 2307.382(A)(7); Civ.R. 4.3(A)(9); *Kauffman Racing Equipment, L.L.C., v. Roberts*, 126 Ohio St.3d 81, 2010-Ohio-2551 (Ohio 2010).

8. Venue is proper with this Court because Defendants are residents of the State of Missouri, and Plaintiff resides in the territorial jurisdiction of the Court. Civ.R. 3(B)(7).

IV. STATEMENT OF FACTS

9. Plaintiff first came into contact with Defendant in early 2010 when Defendant was invited into a lively Internet chatroom discussion in which the topics that were discussed involved hunting, camping, target shooting, outdoor activities, and politics. A dispute arose between Plaintiff and Defendant during the discussion at which time Defendant promised to ascertain the real-life identity of Plaintiff—which was then not known to Defendant—to destroy Plaintiff's reputation.

10. Towards the later part of 2010, Defendant succeeded in ascertaining Plaintiff's identity and began a relentless campaign of harassment that continues to the present day whereby (1) Defendant posted photographs of Plaintiff and Plaintiff's personal phone number onto pornographic websites; (2) Defendant impersonated Plaintiff on the World Wide Web to purport to third-parties that Plaintiff supports child molestation; and (3) Defendant published statements on the World Wide Web that state that Plaintiff is a homosexual, a drug dealer, a con-man, a murderer, a pawn store owner, a "Jewish pimp," engages in insurance fraud, and has syphilis and other venereal diseases. Defendant further defamed Plaintiff by claiming that Plaintiff had threatened to murder an elderly woman and rape another woman.

11. Plaintiff does not support child molestation and Plaintiff is not a homosexual, a drug dealer, a con-man, a murderer, a pawn store owner, or a "Jewish pimp," Plaintiff does not engage in insurance fraud, and Plaintiff does not have syphilis or any other venereal disease. Plaintiff has never threatened to murder any elderly women nor rape any women.

12. At the time Defendant published the false and defamatory statements about Plaintiff as detailed in Paragraph 8 of this Complaint, Defendant had actual or constructive knowledge to believe that Plaintiff does not support child molestation and Plaintiff is not a homosexual, a drug dealer, a con-man, a murderer, a pawn store owner, or a "Jewish pimp," Plaintiff does not engage in insurance fraud, and Plaintiff does not have syphilis or any other venereal disease.

13. In March of 2011, Defendant acquired via a LexisNexis report Plaintiff's voter registration, political party affiliation, vehicle registration, vehicle license plate number, and social security number and publicly disseminated this confidential information via the medium of the World Wide Web to a significant number of third-parties.

14. Between March and July of 2015 Defendant published defamatory remarks, in print format, online, declaring that Plaintiff had committed perjury, wire fraud, and mail fraud, and was engaged in fraudulent conduct in a then ongoing court proceeding.

15. Plaintiff has never committed perjury, wire fraud, or mail fraud and was never engaged in fraudulent conduct at any time during the relevant court proceeding.

16. Due directly and proximately to Defendant's Internet campaign of harassment against Plaintiff as detailed within this Complaint, Plaintiff has suffered damage to Plaintiff's reputation which will adversely affect Plaintiff's ability to procure employment in the future, and Plaintiff has suffered mental anguish in the form of anger, stress, frustration, anxiety, humiliation, and disgust.

17. Defendant has caused injury to Plaintiff in excess of twenty-five thousand dollars ($25,000.00).

18. Plaintiff previously sued Defendant in federal court over the controversy at issue in the instant civil action, but said civil action was dismissed without prejudice within the past year for lack of subject matter jurisdiction due to diversity jurisdiction not being properly shown by Plaintiff. Plaintiff hereby invokes R.C. § 2305.19(A), which pertinently provides that "In any action that is commenced * * *, if the plaintiff fails otherwise than upon the merits, * * * the plaintiff's representative may commence a new action within one year after the date of * * * the plaintiff's failure otherwise than upon the merits[.]" *Menno v. Salem Hunting Club*, 7th Dist. Columbiana No. 11CO2, 2012-Ohio-4553, ¶ 13 ("When a complaint is refiled under the saving statute, the case relates back to the date of the original complaint for purposes of satisfying any statute of limitations problems.").

19. Plaintiff is a private figure for purposes of substantive defamation and invasion of privacy law. New York Times Co. v. Sullivan, 376 U.S. 254 (1964); Gertz v. Robert Welch, Inc., 418 U.S. 323 (1972).

20. Church maintains an interactive and publicly-accessible website on the World Wide Web at <http://christian-identity.net/forum> ("Church Website").

21. Lindstedt published onto Church Website at <http://christian-identity.net/forum/showthread.php?1639-Bryan-Reo-s-Fraudulent-amp-Perjurous-Stalking-Complaint-against-Pastor-Lindstedt-16CS000102> on January 12, 2016, at 9:48 p.m. that Plaintiff's petition for a civil stalking protection order against Lindstedt was "perjurious."

22. Perjury is a crime in the State of Ohio. R.C. § 2921.11.

23. Lindstedt's statement that Plaintiff committed perjury is false.

24. Lindstedt published onto a publicly-accessible webpage on the World Wide Web at <http://www.hateandflame.com/cgi-bin/bbs62x/webbbs_config.pl?md=read;id=105524> on January 23, 2016, at 3:02 p.m. that Plaintiff should be killed by castration. Lindstedt also published on the same webpage Plaintiff's photograph, Plaintiff's residential address, and Plaintiff's phone number.

25. Lindstedt published onto a publicly-accessible webpage on the World Wide Web at <http://www.hateandflame.com/cgi-bin/bbs62x/webbbs_config.pl?md=read;id=108286> on February 18, 2016, at 5:34 a.m., "BRYAN REO MUST DIE CASTRATE THE NIGGER LIPS FUCKER TIME TO KILL[.]" (Emphasis in original).

26. Lindstedt published onto a publicly-accessible webpage on the World Wide Web at <http://www.hateandflame.com/cgi-bin/bbs62x/webbbs_config.pl?md=read;id=104595> on January 18, 2016, at 1:43 p.m., "Bryan Reo needs castrated. Kill that fucking Mamzer[.]"

27. Lindstedt published onto Church Website at <http://christian-identity.net/forum/showthread.php?1639-Bryan-Reo-s-Fraudulent-amp-Perjurous-Stalking-Complaint-against-Pastor-Lindstedt-16CS000102&p=14091#post14091> on February 9, 2016, at 11:06 p.m. that Plaintiff engages in "ass-to-mouth" sex acts with Attorney Kyle Bristow ("Attorney"), a licensed Michigan and Ohio lawyer for whom Plaintiff performs legal research and document drafting assignments.

28. It is inherently injurious to Plaintiff's professional reputation for Lindstedt to publish to third-parties that Plaintiff engages in "ass-to-mouth" sex acts with Attorney.

29. Lindstedt's statement that Plaintiff engages in "ass-to-mouth" sex acts with Attorney is false.

30. Lindstedt published onto Church Website at <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."

31. The Merriam-Webster Online Dictionary defines "catamite" as "a boy kept by a pederast." Merriam-Webster Online Dictionary. <http://www.merriam-webster.com/dictionary/catamite>. Accessed 20 March 2016.

32. Upon information and belief, a catamite plays the subservient and feminine roll in homosexual sex acts.

33. It is inherently injurious to Plaintiff's professional reputation for Lindstedt to publish to third-parties that Plaintiff is a catamite.

34. Lindstedt's statement that Plaintiff is a catamite is false.

35. Lindstedt published onto a publicly-accessible webpage on the World Wide Web at <https://www.youtube.com/watch?v=X4mqgt4MoOQ> a video in which Lindstedt refers to Attorney as "Bryan Reo's 'butt-buddy.'"

36. Upon information and belief, "butt-buddy" is synonymous with catamite.

37. It is inherently injurious to Plaintiff's professional reputation for Lindstedt to publish to third-parties that Plaintiff acts as a "butt-buddy" of Attorney.

38. Lindstedt's statement that Plaintiff is a "butt-buddy" of Attorney is false.

39. 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.

40. 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.

41. 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.

42. 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. The solicitation of the murder caused extreme mental distress to Plaintiff.

43. As a result of Defendants' conduct as described in this Complaint, Plaintiff has suffered damages.

V. CAUSES OF ACTION

COUNT I
COMMON LAW DEFAMATION AGAINST LINDSTEDT

44. The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

45. Lindstedt published false and defamatory statements about Plaintiff to third-parties via the medium of the World Wide Web.

46. Lindstedt's false and defamatory statements about Plaintiff were made by Lindstedt without privilege.

47. Lindstedt acted with at least negligence in making false and defamatory statements about Plaintiff.

48. Lindstedt failed to act reasonably in attempting to discovery the truth or falsity or defamatory character of Lindstedt's publication about Plaintiff.

49. Lindstedt's false and defamatory statements about Plaintiff are defamatory per se insofar as said statements reflect upon the character of Plaintiff by bringing him into ridicule, hatred, or contempt, and affects Plaintiff injuriously in his future trade or profession.

50. Lindstedt committed against Plaintiff the common law tort of libel per se.

COUNT II
COMMON LAW INVASION OF PRIVACY – FALSE LIGHT AGAINST LINDSTEDT

51. The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

52. Lindstedt made false and derogatory statements about Plaintiff that Defendants publicized via the medium of the World Wide Web.

53. The false and derogatory statements made by Lindstedt about Plaintiff placed Plaintiff before the public in a false light.

54. The false and derogatory statements made by Lindstedt about Plaintiff are highly offensive to a reasonable person.

55. Lindstedt is at fault and knew or acted with recklessness as to the truth of the statements made by Lindstedt that concern Plaintiff.

56. As a direct and proximate result of Lindstedt's statements about Plaintiff, Plaintiff has been and will continue to suffer damages in the form of mental anguish and reputational injury.

57. Lindstedt committed against Plaintiff the tort of invasion of privacy – false light.

COUNT III
COMMON LAW INVASION OF PRIVACY – PUBLIC DISCLOSURE OF PRIVATE FACTS AGAINST LINDSTEDT

58. The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

59. Lindstedt publicly disclosed private facts about Plaintiff to third-parties via the medium of the World Wide Web.

60. Lindstedt's disclosure about private facts about Plaintiff would be highly offensive and objectionable to a reasonable person of ordinary sensibilities.

61. Lindstedt's disclosure of private facts about Plaintiff was done intentionally.

62. Lindstedt's disclosure of private facts about Plaintiff are not of legitimate concern to the public.

63. Lindstedt committed against Plaintiff the tort of invasion of privacy – public disclosure of private facts.

COUNT IV
COMMON LAW INVASION OF PRIVACY – INVASION OF SECLUSION

64. The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

65. Defendant intentionally intruded upon Plaintiff's seclusion, solitude, and/or private concerns or affairs by making public disclosures of information about Plaintiff that are of no legitimate concern to the public.

66. Plaintiff has a reasonable expectation of privacy in his solitude, seclusion, and/or private concerns or affairs.

67. The unreasonable intrusions and invasions by Defendant occurred in a way that would be highly offensive to a reasonable person.

68. As a direct and proximate result of Defendant's intrusions upon Plaintiff's seclusion or solitude, Plaintiff has suffered damages.

69. Defendant committed against Plaintiff the tort of invasion of privacy – invasion of seclusion.

COUNT V
PUNITIVE DAMAGES

70. The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

71. Defendant's conduct was conscious, deliberate, intentional, and/or reckless in nature.

72. Defendant's conduct was undertaken with hatred, ill will, and/or vexation.

73. Defendant's conduct was done with a conscious disregard for the rights of Plaintiff and has a great probability of causing Plaintiff substantial harm for many years.

74. Plaintiff is entitled to punitive damages from Defendant.

COUNT VI
PERMANENT INJUNCTION AGAINST LINDSTEDT

75. The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

76. Some or all of the improper and unlawful conduct of Lindstedt is continuing and will continue in the future absent injunctive relief from the Court, and Plaintiff will continued to be damaged by the same.

77. In the absence of the entry of a permanent injunction by the Court, Plaintiff will suffer serious and irreparable harm and injury, including but not limited to damage to Plaintiff's reputation.

78. The entry of a permanent injunction will not unduly harm or burden Lindstedt because Lindstedt is required as a matter of law to refrain from tortiously harming Plaintiff's reputation via the World Wide Web.

79. Public policy favors the entry of a permanent injunction because such relief will prevent unlawful conduct and will preserve and protect Plaintiff's reputation from further injury.

80. Plaintiff is entitled to a permanent injunction in which Lindstedt is compelled to remove from the World Wide Web and not republish thereto any and all derogatory materials Lindstedt or Lindstedt's agents published there about Plaintiff.

COUNT VII
COMMON LAW DEFAMATION AGAINST LINDSTEDT AND CHURCH

81. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

82. Lindstedt and Church published false statements of fact about Plaintiff to third-parties via the medium of the World Wide Web.

83. The false statements of fact published by Lindstedt and Church about Plaintiff were published negligently.

84. The false statements of fact published by Lindstedt and Church about Plaintiff were published by Lindstedt and Church without privilege.

85. The false statements of fact published by Lindstedt and Church about Plaintiff impugns Plaintiff's professional character or standing and/or reflects upon the character of Plaintiff by bringing him into ridicule, hatred, or contempt, and/or state or implies that Plaintiff has committed a crime of moral turpitude. *Becker v. Toulmin*, 165 Ohio St. 549, 138 N.E.2d 391 (Ohio 1956).

86. Due directly and proximately to Lindstedt and Church publishing false statements of fact about Plaintiff, Plaintiff has suffered injury to his reputation and has caused Plaintiff to suffer mental anguish in the form of vexation, irritation, anxiety, frustration, and hatred.

87. Lindstedt and Church are jointly and severally liable to Plaintiff for common law libel per se.

COUNT VIII
COMMON LAW INVASION OF PRIVACY [FALSE LIGHT] AGAINST LINDSTEDT AND CHURCH

88. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

89. Lindstedt and Church published false statements of fact about Plaintiff to third-parties via the medium of the World Wide Web, thereby giving publicity to what Lindstedt and Church stated about Plaintiff.

90. The false statements of fact about Plaintiff published by Lindstedt and Church placed Plaintiff before the public in a false light.

91. The false statements of fact about Plaintiff published by Lindstedt and Church are highly offensive to a reasonable person.

92. Lindstedt and Church are at fault and/or knew or were reckless as to the falsehood of the statements Lindstedt and Church published about Plaintiff.

93. Due directly and proximately to Lindstedt and Church publishing false statements of fact about Plaintiff, Plaintiff has suffered injury to his reputation and has caused Plaintiff to suffer mental anguish in the form of vexation, irritation, anxiety, frustration, and hatred.

94. Lindstedt and Church are jointly and severally liable to Plaintiff for common law invasion of privacy – false light.

COUNT IX
COMMON LAW INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AGAINST LINDSTEDT AND CHURCH

95. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

96. By and through publishing false statements of fact about Plaintiff to third-parties via the medium of the World Wide Web, Lindstedt and Church engaged in extreme and outrageous conduct.

97. Lindstedt and Church acted with an intentional or reckless *scienter* when Lindstedt and Church published false statements of fact about Plaintiff.

98. Due directly and proximately to Lindstedt and Church publishing false statements of fact about Plaintiff, Plaintiff has suffered severe emotional distress in the form of vexation, irritation, anxiety, frustration, and hatred.

99. Lindstedt and Church are jointly and severally liable to Plaintiff for common law intentional infliction of emotional distress.

COUNT X
STATUTORY CRIMINAL LIABILITY AGAINST LINDSTEDT AND FAUSNAUGHT

100. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

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

102. It constitutes a criminal act in the State of Ohio to purposefully cause the death of another. R.C. § 2903.02(A).

103. By and through Lindstedt's published statements onto the World Wide Web, Lindstedt committed against Plaintiff the crime of solicitation to murder.

104. It constitutes a criminal act in the State of Ohio to engage in a pattern of conduct that is knowingly designed to cause another person to believe that the offender will cause physical harm or mental distress to the other person. R.C. § 2903.211(A)(1).

105. It constitutes a criminal act in the State of Ohio for a person to use a computer to post a message with the purpose of urging or inciting another to commit an act that will cause physical harm or mental distress to another person. R.C. § 2903.211(A)(2).

106. By and through Lindstedt's published statements onto the World Wide Web, Lindstedt committed against Plaintiff the crime of menacing by stalking.

107. It constitutes a criminal act in the State of Ohio to use a telecommunications device to abuse, threaten, or harass another person. R.C. § 2917.21(B).

108. Content posted onto the World Wide Web constitute "telecommunications" as that term is defined by R.C. §§ 2913.01(X) and 2917.21(E)(3).

109. By and through Lindstedt's published statements onto the World Wide Web soliciting the murder and/or castration of Plaintiff, Lindstedt committed against Plaintiff the crime of telecommunications harassment. R.C. § 2917.21(C)(1).

110. It constitutes a criminal act in the State of Ohio to actively participate in a criminal gang, with knowledge that the criminal gang engages in a pattern of criminal gang activity, to purposefully promote, further, or assist any criminal conduct. R.C. § 2923.42(A).

111. Church is a "criminal gang" as that term is defined by R.C. § 2923.41(A) which engages in a "pattern of criminal gang activity" as that term is defined by R.C. § 2923.41(B)(1).

112. Fausnaught actively participates in Church by serving as a director and as its registered agent.

113. Upon information and belief Fausnaught has actual knowledge that Church engages in a pattern of criminal gang activity.

114. Upon information and belief, Fausnaught furthers Church's criminal activities by serving as a director and as its registered agent.

115. Lindstedt actively participates in Church by serving as a director, by publishing materials onto Church Website, and by controlling Church's finances.

116. Lindstedt has actual knowledge that Church engages in a pattern of criminal gang activity.

117. Lindsedt furthers Church's criminal activities by serving as a director and by publishing materials onto Church Website and by controlling Church's finances.

118. Lindstedt and Fausnaught victimized Plaintiff by and through Lindstedt's and Fausnaught's criminal gang.

119. Due directly and proximately to Lindstedt and Fausnaught committing crimes against Plaintiff, Plaintiff has suffered injury to his reputation and has caused Plaintiff to suffer mental anguish in the form of vexation, irritation, anxiety, frustration, and hatred.

120. Lindstedt and Fausnaught are jointly and severally liable to Plaintiff for engaging in criminal acts. R.C. § 2307.60.

COUNT XI
COMMON LAW CIVIL CONSPIRACY AGAINST DEFENDANTS

121. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

122. Defendants are two or more legal entities.

123. Defendants acted in a concerted action to tortiously injure Plaintiff.

124. The actions engaged in by Defendants against Plaintiff were committed for an unlawful purpose.

125. Due directly and proximately to Defendants engaging in a civil conspiracy to cause tortious injury to Plaintiff, Plaintiff has suffered injury to his reputation and has

caused Plaintiff to suffer mental anguish in the form of vexation, irritation, anxiety, frustration, and hatred.

126. Defendants are jointly and severally liable to Plaintiff for common law civil conspiracy.

COUNT XII
PUNITIVE DAMAGES AGAINST DEFENDANTS LINDSTEDT AND FAUSNAUGHT

127. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

128. The actions or omissions of Defendants against Plaintiff were consciously, deliberately, and intentionally committed with actual malice.

129. Defendants are jointly and severally liable to Plaintiff for punitive damages. R.C. § 2315.21.

COUNT XIII
PIERCE THE CORPORATE VEIL OF CHURCH

130. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

131. Lindstedt and Fausnaught exercise complete control over Church to such an extent that Church has no separate mind, will, or existence of its own.

132. Lindstedt and Fausnaught control and utilize Church in such a manner so as to commit illegal acts against Plaintiff.

133. Due directly and proximately to Lindstedt and Fausnaught using Church to tortiously injury Plaintiff, Plaintiff has suffered injury.

134. It is unjust for Lindstedt and Fausnaught to hide behind the corporate veil of Church to avoid liability to Plaintiff.

135. The corporate veil of Church should be pierced so that its owners and employees will be jointly and severally liable for any money judgment rendered against Church in the instant civil action. *Dombroski v. WellPoint, Inc.*, 119 Ohio St.3d 506, 2008-Ohio-4827.

XIV. PRAYER FOR RELIEF

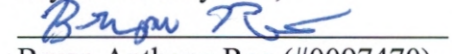
WHEREFORE, Plaintiff prays that this Court will enter judgment against Defendants in Plaintiff's favor in an amount of money that exceeds twenty-five thousand dollars ($25,000.00) for general and special damages, award Plaintiff punitive damages against Defendants in an amount deemed just and proper, award Plaintiff all costs associated with maintaining the instant civil action, award Plaintiff all pretrial and post-trial interest on any and all monetary relief awarded to Plaintiff, award Plaintiff injunctive relief by ordering Defendants to remove from the World Wide Web and not republish thereto derogatory or invasive materials about Plaintiff that Defendants or Defendants' agents published about Plaintiff, and will award Plaintiff all other relief to which Plaintiff is entitled as a matter of law or equity.

JURY DEMAND ENDORSED HEREON

Plaintiff hereby demands a trial by jury on all triable issues of fact. Civ.R. 38.

Respectfully submitted

Bryan Anthony Reo,



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