

**FILED**

2019 AUG -5 PM 1:24  
MAUREEN G. REILLY  
LAKE CO. CLERK OF COURT

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

**BRYAN ANTHONY REO,**

Plaintiff,

v

**MARTIN LINDSTEDT, ET AL.,**

Defendants.

Case Nos. 15CV001590 and 16CV000825 ✓

Hon. Patrick J. Condon

**REO LAW LLC**

Bryan Anthony Reo (#0097470)  
P.O. Box 5100  
Mentor, OH 44061  
(T): (440) 313-5893  
(E): reo@reolaw.org  
*Pro se Plaintiff*

**MARTIN LINDSTEDT**

338 Rabbit Track Rd.  
Granby, MO 64844  
(T): (417) 472-6901  
(E): pastorlindstedt@gmail.com  
*Pro se Defendant*

**PLAINTIFF'S REPLY BRIEF IN SUPPORT OF  
PLAINTIFF'S MOTION FOR ATTORNEY'S FEES,  
SANCTIONS, AND PRE-JUDGMENT INTEREST**

NOW COMES Bryan Anthony Reo ("Plaintiff"), *pro se*, and hereby propounds upon Martin Lindstedt ("Defendant") and this Honorable Court Plaintiff's Reply Brief in Support of Plaintiff's Motion for Attorney's Fees, Sanctions, and Pre-Judgment Interest:

**I. STATEMENT OF FACTS**

Plaintiff prevailed against Defendant as the result of a favorable verdict returned by the jury at the conclusion of the jury trial which began on June 24, 2019, and ended on June 26, 2019.

Defendant Lindstedt, during the proceedings, maintained a patently frivolous counter-claim against Plaintiff Reo, all but one cause of action of which was disposed of by directed verdict during the trial. The following causes of action of Lindstedt's Counter-claim were disposed of on directed verdict. Abuse of Legal Process [no evidence], Malicious Prosecution [no evidence], Vexatious Litigation [determined not to be a cause of action], Statutory Criminal Liability [lack of sufficient evidence that a crime took place], Civil Conspiracy [lack of evidence that Plaintiff Reo

participated in any malicious combination], Spoliation of Evidence [no evidence], Tortious Interference with Economic Relations [Plaintiff Reo was privileged or justified to make complaints to Internet Service Providers], Invasion of Privacy [no evidence], Intentional Infliction of Emotional Distress [no evidence]. The only one of Defendant's Counter-claims that was presented to the jury was libel/defamation and the jury returned a verdict in favor of Plaintiff Reo against Defendant Lindstedt.

Since losing, Defendant Lindstedt has gone on his website and posted that he never intended to win and that the purpose of his counter-claim was to lose to prove a point about the political system in the United States. This is not a proper motive for pleading, maintaining, and prosecuting a counter-claim, a counter-claim that Plaintiff Reo spent time, money, and other resources to defend against. The post is attached as Exhibit 1.

See the below link where Lindstedt brags about the reasoning behind his counter-claim

<http://www.whitenationalist.org/forum/showthread.php?2147-Discussion-Bryan-Reo-v-Lindstedt-Aryan-Nations-Verdict&p=20067#post20067>

*The purpose of litigation is to lose and in losing to set a precedent for Resistance Military Tribunals processing ZOGling whigger ass-clown traitors and regime-criminals like on a Tyson Foods processing plant. The only way to treat sick diseased sub-animals is worse than they treated White People in theyz' power. After all they cannot claim to have any rights when they have done nothing but run a kangaroo kort of theyz' own, now can they?*

Unfortunately for Defendant Lindstedt, such a purpose is not a proper purpose. Unfortunately for Plaintiff Reo, Lindstedt's vexatious nonsense caused Reo to incur costs. Unfortunately for this Court, Lindstedt's vexatious nonsense caused this Court to waste precious judicial resources, time, and money. Lindstedt needs to be sanctioned.

## II. LAW & ARGUMENT

Plaintiff incurred four thousand two hundred dollars (\$4,200.00) while Mr. Klimkowsky served as Plaintiff's attorney-of-record, and said fees were mostly generated due to an onslaught of frivolous documents Defendant filed.

Plaintiff has incurred numerous injuries at the hands of Lindstedt, from 9/18/2014 forward, and is entitled to pre-judgment interest from the date of Plaintiff's causes of action to the date of the jury rendering a verdict favorable to Plaintiff. The pre-judgment interest would be in the amount of \$18,521.24 dollars.

This Court should also undertake to sanction Lindstedt, in the amount of \$9,000.00 as requested by Plaintiff, to penalize him for his frivolous and vexatious post-judgment motions which consist of little more than racist ramblings of, "I want a new trial because there was a negro on the jury" and other such nonsense.

Lindstedt's conduct throughout this case caused Plaintiff to incur \$4,200.00 in attorney's fees and his continued frivolous and vexatious conduct is sanctionable and he should be sanctioned an additional \$9,000.00 dollars to penalize him for what he has done thus far with his vexatious frivolous counter-claim.

R.C. § 2323.51 pertinently states:

(A) As used in this section:

(1) "Conduct" means any of the following:

(a) The filing of a civil action, the assertion of a claim, defense, or other position in connection with a civil action, the filing of a pleading, motion, or other paper in a civil action, including, but not limited to, a motion or paper filed for discovery purposes, or the taking of any other action in connection with a civil action;

\* \* \*

(2) "Frivolous conduct" means either of the following:

(a) Conduct of an inmate or other party to a civil action, of an inmate who has filed an appeal of the type described in division (A)(1)(b) of this section, or of the inmate's or other party's counsel of record that satisfies any of the following:

(i) It obviously serves merely to harass or maliciously injure another party to the civil action or appeal or is for another improper purpose, including, but not limited to, causing unnecessary delay or a needless increase in the cost of litigation.

(ii) It is not warranted under existing law, cannot be supported by a good faith argument for an extension, modification, or reversal of existing law, or cannot be supported by a good faith argument for the establishment of new law.

(iii) The conduct consists of allegations or other factual contentions that have no evidentiary support or, if specifically so identified, are not likely to have evidentiary support after a reasonable opportunity for further investigation or discovery.

(iv) The conduct consists of denials or factual contentions that are not warranted by the evidence or, if specifically so identified, are not reasonably based on a lack of information or belief.

See also Civ.R. 11.

In the instant case, Defendant's numerous court filings while Mr. Klimkowsky served as Plaintiff's attorney-of-record were obviously filed for the purpose of harassing and injuring Plaintiff, the relief prayed for by Defendant was not warranted by law or a good-faith argument for the modification of existing law, and Defendant's allegations of fact did not comport with reality. As such, the Court can and should impose sanctions in the form of attorney's fees against Defendant. Attorney's fees in the amount of \$4,200.00 dollars should be assessed against Defendant.

The Court also has inherent power to sanction Defendant to penalize his conduct throughout these proceedings and to discourage him and prevent him from continuing to engage in the sort of conduct he has engaged in from day one through to the present with his most recent filings. He should be sanctioned \$9,000.00 dollars.

The Court should also enter an order granting Plaintiff pre-judgment interest in the amount of \$18,521.24 dollars because Plaintiff is legally entitled to pre-judgment interest from the date the injury occurred and the cause of action arose.

### **III. CONCLUSION**

For the reasons set forth herein, Plaintiff prays that this Honorable Court will award sanctions in Plaintiff's favor against Defendant in the amount of four thousand two hundred dollars

(\$4,200.00), which is for the twenty-one (21) hours Mr. Klimkowsky worked on the case as Plaintiff's attorney-of-record at the rate of \$200 per hour between January 2017 and June 2018, in addition to nine thousand dollars (\$9,000.00) as a sanction against Defendant, and eighteen thousand five hundred twenty-one dollars and twenty-four cents (\$18,521.24) which is pre-judgment interest that Plaintiff is entitled to, for a total award of \$31,721.24 dollars to be added to the judgment entered on 7/1/2019.

Respectfully submitted,

**REO LAW, LLC**



Bryan Anthony Reo (#0097470)

P.O. Box 5100

Mentor, OH 44061

(T): (440) 313-5893

(E): reo@reolaw.org

*Pro se Plaintiff*

## Certificate of Service

I, Bryan Reo, do hereby certify that a true and genuine copy of the foregoing has been dispatched by United States **CERTIFIED MAIL, RETURN RECEIPT REQUESTED** to the Defendants at:

Martin Lindstedt  
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 5 day of August, 2019

X

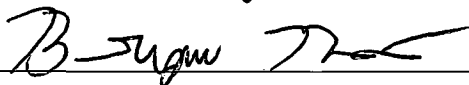


Exhibit 1

07-21-2019 10:53 PM

#4



**PastorLindstedt** ◊  
**ArchBishop of Missouri**  
**Senior Member**  
 ■■■■■■■■

Join Date: May 2009  
 Location: Granby, State of  
 Missery, ZOG  
 Posts: 4,933

 **Very Good Questions from someone who doesn't know the legal system**

## Very Good Questions from someone who doesn't know the legal system

<http://thebeerbarrel.net/threads/bry...7/#post-270903>

<http://christian-identity.net/forum/...0067#post20067>

<http://whitenationalist.org/forum/sh...0067#post20067>

 Originally Posted by **Mandalore**, post: **270888**, member: **8**

*Wtf is this shit about you allegedly having to pay two THOUSAND fucking dollars for a transcript? I'm pretty damn sure its a crime to impair a citizen's access to his own legal records. And was I correct that the lawyer who demanded such a fee is a nigger?*

More than likely I'll indeed have to pay \$2,276 for the transcript from Judge Condon's kort secretary. In fact, I'll probably want to do so as founding capital for my Aryan Nations of Missouri sub-corporation Lake County Geldings and Walking Wombs in which I am applying the principles of Biblical Castration as applied to Daniel and its three friends Shadrach, Mesach, & Abednego by Nebuchadnezzar for Hezekiah's curse for showing the Babylonians the riches of Judah and Solomon's Temple 120 years previous, cf. 2 Kings 14-19.

The correct procedure in how to deal with whigger regime-criminal race-traitors is to force them to bite off they's spawn's nuts and sodomize theys' daughters with a broom handle before giving cutting they's fallopian tubes and forcing then to

bear the children of a new Master Race. These nitwits are already fantasizing about "A Handmaid's Tail" well, let their castration anxieties cum true.

You see, it makes their racial treason unprofitable. When Daniel got his nuts cut and becum a eunuch he served his new master Nebuchadnezzar faithfully and well because Daniel had no other loyalties other than to YHWH. You cut off the regime-criminal ZOGling whigger traitor ass-clowns' spawn's nuts then they have no other choice other than to do what they is told.

The trial was a cumplete farce. An Africoon sheboon was forced onto the Lake County Lynch Mob jury over my objections by the hibernigger judge Patrick Condon and Plaintiff Bryan Reo / Ol' Niggerlips the Mamzer from Mentor. Look at old posts in the jewlag and you will see how with Daryl Basarab / Kane12345666 they both got Da MamzerBarrell kicked off of HostMamzer.com back in late 2010. Then Kane12345666 sent me sum Xuqa.com pics of Ol' Niggerlips.

<http://www.whitenationalist.org/foru...hey-re-Fooling>

<http://www.whitenationalist.org/foru...n-Reo-Pictures>

So me and Ol' Niggerlips have been going at it since 2010. Niggerlips sued me for \$10.75 million in federal kort, lost, then sued me in Lake County kort, then Roxie and my Church of Jesus Christ Christian / Aryan Nations of Missouri after it lost in federal kort.

Reo was on the Board of Directors of the Foundation for the MarketPlace of Ideas / ZOGbot Poverty Flaw Center. At trial it denied knowing Rabbi Baal Finck or being a White Supremacist. I'm going to be suing those Board Members, including the League of the South and the Charlottesville Fuktards. But not Bradifer Griffith / Cunthair Walrus as the pore shithead is my friend even though a bi-polar mattoid.

Anyways the Ohio Statute of Limitations is one year. The case must be thrown out on appeal. And for lack of jurisdiction as the case against my Church and Roxie was filed in the Mentor Municipal Kort.

Mentor is the home of James Garfield, 20th so-called President and Union General. They still hate Southern Whites, and were slaving to coonvict upon hearing the name "Aryan Nations". Bryan Reo kicked off all the old White Men, especially an old Serb or Croat who worked for the IBEW at the North Perry

Nuclear Power Plant, where Ol Niggerlips got fired when my web page revealed after numerous nuclear accidents that SwordBrethren was a self-loathing non-white White Supremacist.

I was not allowed to present any evidence and Niggerlips was allowed to cherry-pick from my web page. The trial was a total farce. I deliberately spurred on the Lake County Lynch Mob because I want Southerners to feel proud of lynching Emmitt Till because gliberal whigger Yankees force niggers onto juries to lynch White Men.

I've never won a single jury trial in my life and I sure wasn't about to start messing up my perfect record on 24-26 June 2019.

Ol' Niggerlips filed a post-trial pre-appeal Motion for Pre-Trial Interest. I've mailed off a Reply Brief Saturday -- and then got Ol' Niggerlip's Certified Copies of its Brief i9n my mailbox after filing the Motion. Niggerlips is dishonest.

The purpose of litigation is to lose and in losing to set a precedent for Resistance Military Tribunals processing ZOGling whigger ass-clown traitors and regime-criminals like on a Tyson Foods processing plant. The only way to treat sick diseased sub-animals is worse than they treated White People in theyz' power. After all they cannot claim to have any rights when they have done nothing but run a kangaroo kort of theyz' own, now can they?

By the way, I'm working on getting the security video of the proceedings in low-fi. I'll be posting it here for jewr amusement if not kicked off again by Puto Seattlekike. As I recollect it was a hoot. Bryan Reo is the most vicious golem that I have ever fought, worse even than TraitorGlenn Miller.

Hail Victory !!!

Pastor Martin Luther Dzerzhinsky Lindstedt  
Church of Jesus Christ Christian / Aryan Nations of Missouri



**Reply With Quote**