

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

BRYAN ANTHONY REO, et. al.,	)	
Plaintiff,	)	
	)	No. 15CV001590
vs.	)	No. 16CV000825
	)	Judge Patrick J. Condon
MARTIN LINDSTEDT, CHURCH OF JESUS	)	Proposed Jury Instructions
CHRIST CHRISTIAN/ARYAN NATIONS OF	)	Derived from Ohio OIJ
MISSOURI, et al.,	)	(Separate copy for each case)
Defendants.	)	

**DEFENDANTS' AMENDED JURY INSTRUCTIONS & PRE-TRIAL STATEMENT**

COMES NOW the current Defendant / Counter-Claimant Pastor Martin Lindstedt (hereafter in person described as "Pastor Lindstedt") and to the limited extent possible for Roxie Fausnaught and The Church of Jesus Christ Christian / Aryan Nations of Missouri (neither of which are within the jurisdiction of this local Lake County Court except within the fevered delusions of Bryan Reo – now a licensed attorney and perjurous officer of this Court (Bar # 0097470) and furthermore Roxie Fausnaught has never been served) to propose Amended Jury Instructions and Pre-Trial Statement via e-mail and via paper to this Court in Word Format to CommonPleasCourtV@lakecountyohio.gov. Due to Bryan Reo's antics in asking for a delay, then holding its Requests for Further Delay for up to three days in sending those out, Pastor Lindstedt mailed his reply asking this Court to hold trial on Thursday, 27 June 2019 so that he could drive the 900 miles to Lake County on Monday and Tuesday and rest and prepare for trial on Wednesday before finally disposing of Reo's frivolous and abusive cases before a jury on Thursday. The current clerk said that this Court must reserve jury room space so the trial remains set for 24 June. Pastor Lindstedt sent via e-mail his Proposed Jury Instructions, some of which he drafted during the previous cancelled trial dates on Monday. Here is the updated Jury Instructions and a Pre-Trial Statement to be sent via e-mail and by paper copy to the Court and to the Plaintiff and Plaintiff's co-conspirators.

The issues at trial are really simple although absurd. Pastor Martin Lindstedt and his Church of Jesus Christ Christian / Aryan Nations of Missouri Church are religious practitioners



of Dual-Seedline Christian Identity. Around 2009 sundry jews and mongrels and homosexuals working with antifa or NGOs or government police forces decided to place a jew from New Jersey who murdered a Puerto-Rican sneak thief in the Jersey City jail and who then snitched on his fellow jailers and ruined their appeals for federal civil rights violations in as a "Greek scholar" and Christian Identity pastor and a known mixed-race mongrel and suspected homosexual kicked out of another false-flag white supremacist group named Bryan Reo. Around Halloween 2010 Pastor Lindstedt found out "SwordBrethren's/ SoredMamzer's" real identity from its Facebook profile picture which was its 2004 Mentor High School picture. Upon which Bryan Reo made fraudulent Digital Millennium Copyright Act takedowns and Terms of Service complaints which got around a dozen of Pastor Lindstedt's Church web pages, blogs and forums taken down. This while William Finck gave Reo a blog in which Reo claimed Lindstedt was a "convicted child molester". William Finck three weeks ago used the same libel on Facebook. William Shawn DeClue who Pastor Lindstedt stupidly ordained upon DeClue's begging and then revoked that certification, boasts of aiding Reo in Terms of Service snitching, as well as calls Pastor Lindstedt a child molester while bragging of sexually assaulting his white and negro nieces. Melissa Epperson is some woman that Finck met over the Internet who abandoned her husband, while she has called Pastor Lindstedt a child molester she is a nonity and Lindstedt dismisses her from this suit.

Bryan Reo, along with his lawyers Brett Klimkowsky and former employers Kyle Bristow along with others in the Alt-Right White Supremacist Movement have been used against old-time White Supremacists like Pastor Lindstedt in Reo's bogus litigation before this Court of no real jurisdiction. This case is nothing more than a Internet fight between old style White Supremacists and Christian Identity leaders and wannabe non-white White Supremacists who are likely agents provocateurs / ZOGBots leading a pack of mongrels wanting to play at White Supremacy. Bryan Reo lost a \$10.75 million federal lawsuit so he run to this Lake County Court on Sept. 18, 2015 and filed the exact same crap other than the DMCA "violations". Since then Reo has filed numerous cases, including a stalking case in which he impersonated Pastor Lindstedt threatening to "castorate" Bryan Reo and got it because Lindstedt couldn't be bothered to spend \$600 and a week's time to fight it. Reo has sued Roxie Fausnaught because she cannot fight back and Pastor Lindstedt's Church, who uses this as an excuse to ask the devout Christian Identity followers to prion-poison Ohio in general and Lake County in particular. Bryan Reo has also sued this Court of no jurisdiction with groundless appeals in order to delay trial, and to



harass Pastor Lindstedt, Lindstedt's woman and Lindstedt's Church. This matter should finally go to trial and Bryan Reo, Bryan Reo's fellow wannabe White Supremacist lawyers Kyle Bristow and Brett Klimkowsky disbarred and heavy punitive damages assessed for abuse of legal process, vexatious litigation, and malicious prosecution of this case which should have been dismissed with prejudice upon filing. William Finck and William Shawn DeClue should be punished for libel per se in calling Pastor Lindstedt a "convicted child molester" and punished for tortuous interference with taking down Pastor Lindstedt's Church web pages.

Since this Court seems to not want to overextend its jurisdiction to William Finck and William DeClue then to be just Roxie Fausnaught who is functionally illiterate, never did anything against Bryan Reo or the rest of Reo's jew-crew playing See-Eye Dentist and can't get out of her bed should be dismissed. Likewise with Pastor Lindstedt's Aryan Nations Church, which really shouldn't be in this case either. While doubtless parts of Ohio have already broken out with Chronic Wasting Disease there is no point in six million Ohio deer or 600,000 elderly deserving having their brains eaten out over a \$6 default judgment because the Aryan Nations of Missouri refused to hire a lawyer & Pastor Lindstedt didn't put any money into the account.

Everything in this Amended Pre-Trial Statement and Jury Instructions has been posted before. Bryan Reo doesn't seem to have recently posted anything before this Court as of yet.

### **DEFENDANTS' AMENDED CAUSES OF ACTION**

1. Abuse of legal process, malicious prosecution, vexatious litigation against Pastor Lindstedt, Lindstedt's Church, Roxie Fausnaught by Bryan Reo, Bryan Reo's father Anthony Reo, William Finck, William Shawn DeClue, Attorneys Kyle Bristow and Brett Klimkowsky. (Question as to jurisdiction vs. Finck and DeClue)
2. Statutory Criminal Liability against by Bryan Reo, Attorneys Kyle Bristow & Brett Klimkowsky making a perjurious claim of stalking resulting in a fraudulent "protection order" for Bryan Reo.
3. Permanent Disbarment of Bryan Reo, Kyle Bristow, Brett Klimkowsky.
4. Claim for Permanent Injunction against Bryan Reo making any pro se claims against anyone outside the boundaries of Lake County Ohio unless Bryan Reo posts a bond amount equal to Reo's claims first.
5. Re-opening any Ohio cases filed by Bryan Reo, Attorneys Kyle Bristow & Brett Klimkowsky and upon application of civil defendants setting aside any and all settlements arrived in favor of defendants.



6. Punitive Damages against Bryan Reo, Bryan Reo's father Anthony Reo, William Finck, William Shawn DeClue, Attorneys Kyle Bristow and Brett Klimkowsky. (Question as to jurisdiction vs. Finck and DeClue).

7. Civil conspiracy against Bryan Reo, Bryan Reo's father Anthony Reo, William Finck, William Shawn DeClue, Attorneys Kyle Bristow and Brett Klimkowsky. (Question as to jurisdiction vs. Finck and DeClue)

8. Spoilation / Destruction of Evidence by Bryan Reo, Bryan Reo's father Anthony Reo, William Finck, ~~Melissa Epperson~~, William Shawn DeClue, Attorneys Kyle Bristow and Brett Klimkowsky. (Question as to jurisdiction vs. Finck, Epperson and DeClue).

**Bryan Reo's Common Law Nonsense in which this Court lacks jurisdiction**

9. Defamation against Martin Lindstedt by Bryan Reo, Bryan Reo's father Anthony Reo, William Finck, Melissa Epperson, William Shawn DeClue, Attorneys Kyle Bristow and Brett Klimkowsky.

10. Tortuous interference with contract by threatening or inducing around a dozen Internet Hosting Companies to shut down Pastor Lindstedt's & Lindstedt's Church's web pages by Bryan Reo, Bryan Reo's father Anthony Reo, William Finck, William Shawn DeClue, Melissa Epperson, Attorneys Kyle Bristow and Brett Klimkowsky.

11. Common Law Invasion of Privacy False Light against Bryan Reo, Bryan Reo's father Anthony Reo, William Finck, William Shawn DeClue, Melissa Epperson.

12. Common Law Invasion of Privacy Public Disclosure of "Private Facts" against Bryan Reo, Bryan Reo's father Anthony Reo, William Finck, William Shawn DeClue, Melissa Epperson. (Which is the stupidest crap ever made up by Bryan Reo but here is right back at the crazed mongrel, with this Court having even less than its already zero jurisdiction.)

13. Common Law Invasion of Privacy Intrusion/Invasion of Seclusion against Bryan Reo, Bryan Reo's father Anthony Reo, William Finck, William Shawn DeClue, Melissa Epperson.

14. Common Law Intentional Infliction of Emotional Distress Bryan Reo, Bryan Reo's father Anthony Reo, William Finck, William Shawn DeClue, Attorneys Kyle Bristow and Brett Klimkowsky.

**DEFENDANTS' PROPOSED JURY INSTRUCTIONS**

**Public Figure / Limited Purpose Public Figure vs. Private Individual:**

In the context of defamation actions (libel and slander) as well as invasion of privacy, a public figure or limited-purpose public figure cannot succeed in a lawsuit on incorrect harmful statements in the United



States unless there is proof that the writer or publisher acted with actual malice by knowing the falsity or by reckless disregard for the truth.<sup>[2]</sup> The legal burden of proof in defamation actions is thus higher in the case of a public figure or limited-purpose public figure than in the case of an ordinary person.

A **limited purpose public figure**, those who have "thrust themselves to the forefront of particular public controversies in order to influence the resolution of the issues involved." A "particularized determination" is required to decide whether a person is a limited purpose public figure, which can be variously interpreted:

A person can become an "involuntary public figure" as the result of publicity, even though that person did not want or invite the public attention

A person can also become a "limited public figure" by engaging in actions which generate publicity within a narrow area of interest.

Discussion of a person on the Internet may at times rise to the level that it causes the subject of discussion to be treated as an involuntary public figure.<sup>[4]</sup>

Corporations are not automatically treated as public figures, and defamation claims made by corporations are evaluated under the same standard as those made by individuals.

Above taken from Wikipedia under "Public Figure" [https://en.wikipedia.org/wiki/Public\\_figure](https://en.wikipedia.org/wiki/Public_figure)

The jury must decide whether within the sub-culture of White Supremacy and Christian Identity religion whether Bryan Reo, Pastor Martin Lindstedt, William Finck, Clifton Emahiser, William Shawn DeClue, due to claiming to be or acting as significant figures with these sub-cultures are limited-purpose public figures or due to discussion on the Internet about what they actually look like or their public lives caused in part by this legal action(s), are limited-purpose public figures and thus cannot prevail due to established law on defamation or invasion of privacy claims. The Church of Jesus Christ Christian / Aryan Nations of Missouri has made no statements for or against the above-mentioned individuals other than repeating the doxology that jews, mongrels, homosexuals, murderers, etc. do not belong in the Body of Christ and should not, if either a jew or mongrel, be accepted within our groups as White.

**Defamation: (CV) 431.01** Defamation is a false written or oral claim that injures another's reputation. **Defendant's Claim:** Defendant claims that the Plaintiff Bryan Reo republished a written treatise by Eli James on a wordpress blog given him by William Finck saying that Pastor Lindstedt was a "convicted child molester" nine or more times, which Bryan Reo took down in order to engage in litigation first at the federal level and now in this state court. This treatise is still on William Finck's web page. Both Bryan Reo, William Shawn DeClue still call Pastor Lindstedt a child molester, William Finck as recently as 3 weeks ago. Pastor Lindstedt is accused of republishing a Lexus-Nexus semi-public printout of Bryan Reo circa Jan 2011 other news & media reports & federal court records on Bryan Reo.



**Statute of Limitations:** Ohio Statutes give only a year to commence civil litigation on Bryan Reo's Defamation claims. Thus anything prior to Sept. 18 2014 when Reo having lost its federal case is barred from prosecution filed before this Court sans jurisdiction.

**Prior Loss in Federal Court:** Bryan Reo's lawsuit *in forma pauperis* for \$10.75 million was dismissed without prejudice before the Western District of Missouri. Pastor Lindstedt filed a counter-claim against Reo and other defendants. Reo couldn't show \$75,000 in damages to overcome the diversity of citizenship clause. Rather than pay the docket fee Reo chose to make this litigation #27 before this Court. Since Reo failed in federal court Reo doesn't get to re-litigate this matter before this Court.

**Spoilation CV 437:** Defendant(s) claim that Plaintiff Bryan Reo and Reo's co-conspirators William Finck and William DeClue interfered with or destroyed evidence in order to advance Reo's case and harm Defendant(s). In order for Defendant(s) to recover on their counter-claim(s) you must find by the greater weight of evidence that

- (a) There was /is a pending lawsuit initiated by Reo involving the defendant(s);
- (b) The plaintiffs knew that a lawsuit involving the defendants was pending/probable; and
- (c) The plaintiff Reo and Reo's co-conspirators willfully destroyed or interfered with evidence for the purpose of disrupting Defendant(s)' ability to prove both a claim or make a defense in this pending case.
- (d) The Plaintiff and Plaintiff's co-conspirators conduct disrupted the Defendant's ability to prove a claim or defense in this lawsuit; and
- (e) The Plaintiff's and Plaintiff's co-conspirators conduct is a proximate cause of injury and damage to the Defendant(s).

**Abuse of Process. CV 435.** The Defendant(s)' claim the Plaintiff Bryan Reo and Reo's co-conspirators William Finck and William DeClue has engaged in abuse of legal process. Abuse of process is the use of a properly initiated lawsuit to achieve a result such as censoring Defendant(s)' temporally or permanently such as a "gag order" or to seize Defendant's inheritance that this Court does not have the authority to order. **Proof of Claim.** Before you can find for the Defendant(s) you must find by the greater weight of evidence that (a) The Plaintiff began this lawsuit upon losing in federal court in proper form but without much, if any merit to this case; (b) the Plaintiff perverted the proceeding to attempt to accomplish an ulterior purpose for which it was not designed; and (c) Defendants have been directly damaged by the wrongful and abusive use of legal process.

**Tortious interference,** also known as **intentional interference with contractual relations,** occurs when one person intentionally damages someone else's contractual or business relationships with a third party causing economic harm. Before you can find for the Defendant(s) you must find by the greater weight of



evidence that: 1) The existence of a contractual relationship or beneficial business relationship between two parties. 2) Knowledge of that relationship by a third party 3) Intent of the Plaintiff to induce a party to the relationship to breach the relationship. 4) Lack of any privilege on the part of the third party to induce such a breach. 5) The contractual relationship is breached and 6) Damage to the Defendants against whom the breach occurs

### **Pretrial Statement Continued**

#### **2. Statement of factual issues and legal issues in dispute.**

Simply put, Bryan Reo and Reo's attorneys want to whine that Pastor Lindstedt publishes Bryan Reo's not being remotely white while they want to pretend to be a White Supremacist legal think tank. They seek to use this local Lake County Court to allow Bryan Reo to engage in abuse of legal process, perjury, malicious prosecution and vexatious litigation against Pastor Lindstedt living 900 miles away. They seek to do away with the First Amendment and to censor the Internet, and to impose a "gag order" when no court, either federal or local has jurisdiction to do this. Pastor Lindstedt wants to settle this matter even though this Court has no jurisdiction over Pastor Lindstedt by bringing this matter to jury trial, getting a judgment against Bryan Reo, Bryan Reo's father, and Bryan Reo's attorneys, and them put in jail and disbarred.

**3. Stipulations.** Bryan Reo admits that Pastor Lindstedt hasn't admitted to anything much other than Pastor Lindstedt runs certain web sites and that Pastor Lindstedt didn't admit anything during discovery that wasn't already known, i.e. about Bryan Reo. Bryan Reo also admitted that most of his initial lawsuit, #1590 was barred by the Ohio Statute of Limitations in one of his pleadings last year and all that was left was emotional damage from something or another.

#### **4. List of Non-Expert Trial Witnesses:**

Bryan Anthony Reo. (Plaintiff and fact witness)

Anthony D. Reo (Plaintiff's father, Reo co-conspirator and co-Defendant)

Pastor Martin Lindstedt (Defendant who is being maliciously sued by Bryan Reo)

Roxie Fausnaught (Person who is being maliciously sued by Bryan Reo taking advantage of her illiteracy and the fact that she cannot even get out of bed and into a wheelchair who will be available to testify as to what little she knows, if anything, only by telephone)

**Reo Items #5, List of Expert Witnesses:** None,

**Item #6, Specific Legal Problems Anticipated:** This Court only has jurisdiction over Reo, Reo's father, and Reo's two lawyers Kyle Bristow and Brett Klimkowsky.



**Item #7, Estimated Length of Trial:** One Day, Maximum of Two Days.

**Item #8. Pre-trial Motions Contemplated.** Bryan Reo and Reo's lawyer Brett Klimkowsky filed a Motion in Limine to exclude the introduction of any evidence of Plaintiff's other civil actions, whether closed or ongoing. However, Bryan Reo complains that Pastor Lindstedt accuses Reo wire fraud, of abuse of legal process, malicious prosecution, and vexatious litigation not only in this the present cases, but against others as well. This Court itself in Reo v. National Auto Division, 16CV000526 on July 13, 2016 found that Bryan Reo and his Attorney Brett Klimkowsky refiled a case in this Court against the National Auto Division after losing in federal court by claiming to have evidence of robotic calling then being unable to prove it so they refiled again before this Court. It is obvious that when caught out in a lie that Reo and Klimkowsky have to dismiss these fraudulent cases rather than face sanctions. This is something that a jury should know is that both Bryan Reo and Klimkowsky have been caught out in perjury before. Pastor Lindstedt also wants to play recordings from other Bryan Reo victims of legal abuse who Reo and Klimkowsky bullied into settling given that they couldn't afford to fight it out in court.

Insofar as the Motion in Limine to exclude all Testimony by Pastor Lindstedt, this is unconstitutional and furthermore based upon lies by Bryan Reo and Klimkowsky. While Pastor Lindstedt was unlawfully sent to the Fulton State Hospital, it was because of a refusal to accept a public defender to [mis]represent Pastor Lindstedt. Upon being sent to medium security and being able to commence legal activity, by pretending to hire a lawyer and getting the illegal forced medications stopped, Pastor Lindstedt then refused to hire an attorney, the exhibit presented by Reo concerned being allowed to represent myself, and to bond out and the bogus case fell apart before a preliminary hearing could be made. The case itself was dismissed. This is yet another fraudulent Motion by Bryan Reo and Klimkowsky to deny Pastor Lindstedt presenting his evidence on Lindstedt's and Lindstedt's Church's counter-suit ready to go to trial. All of the idiotic Reo Motions in Limine have been quashed by this Court Aug 23, 2017. In the nearly two years since this was drafted in Jan 2018, Bryan Reo has filed additional bogus TCPA cases for Reo's father, his wife and himself and lost a number of them.

**Item #9, Special Equipment Needed.** Projector for Exhibits, Computer access.

**Item #10 Settlement Demand:** \$100,000 from Bryan Reo each for Cases #15CV001590, #16CV000825, and #16CS000102, \$100,000 vs. Anthony D. Reo for which of the above cases can be proven, \$100,000 from Brett Klimkowsky and Kyle Bristow for which of above cases they did conspire with Bryan Reo; disbarment and sanctions against Reo, Klimkowsky and



Bristow; \$100,000 vs. William Finck and William DeClue, \$25,000 vs. ~~Melissa Epperson and Clifton Emahiser, \$10,000 vs. John Britton~~ and removal from the Internet of Christogenia.org.

**Item #11. Settlement Offer.** Bryan Reo offered to leave the Movement back in 2010. Reo lied, Reo always lies on matters great and small, just as it lied to Buck McHugh and John Britton. There is not going to be any settlement offer with Bryan Reo.

Hail Victory !!!

*Martin Lindstedt Pastor CTC / ANP*

Pastor Martin Lindstedt, Defendant / Counter-Claimant

The Church of Jesus Christ Christian / Aryan Nations of Missouri (pastorlindstedt@gmail.com)  
338 Rabbit Track Road, Granby Missouri 64844 (Tel #) 417-472-6901

*J. Brett Martin*

*Roxie Fausnaught*

Roxie Fausnaught, 417-472-6901

**Certificate of Service:**

I, Pastor Lindstedt, posted a copy of the above posted on Lindstedt's Church web forum for the perusal of the general public as well as of all the parties concerned as of 14 June 2019 at below thread: <http://www.whitenationalist.org/forum/showthread.php?1614>

And a true and genuine copy of this motion/brief/filing has been dispatched by United States mail, postage prepaid on 14 June 2019 to the following at:

**Bryan Reo (& Anthony D. Reo**, Bryan Reo's Father / Co-conspirator), 7143 Rippling Brook Lane, Mentor Ohio 44060 (Reo violates its bogus stalking order, Lindstedt doesn't)

The following were sent e-mail as well as notified by U.S. Mail:

**Attorney Brett Klimkowsky**, Reo's lawyer, P.O. Box 114, Martin Ohio 43445 (brett1066@gmail.com)

**William R. Finck, Melissa Epperson**, PO Box 7201, Panama City, FL 32413

(wmfinck@christogenea.org). **Clifton Emahiser** died while under custody of Finck.

**William Shawn DeClue**, 3 Blanchette Drive, Florissant, Missouri 63031 (cichaplain@aol.com)

Understanding that this mailing might not reach this Court within three days by in addition to filing this with the Clerk of the Lake County Court, 26 North Park Place, Painesville Ohio, 44077-3416, Pastor Lindstedt will send the hyperlink to a copy via email to: CommonPleasCourtV@lakecountyohio.gov