

**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

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Pro se Plaintiff

PASTOR MARTIN LINDSTEDT

338 Rabbit Track Rd.

Granby, MO 64844

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Pro se Defendants

**CHURCH OF JESUS CHRIST CHRISTIAN /
ARYAN NATIONS OF MISSOURI**

**DEFENDANTS' BRIEF IN SUPPORT OF THEIR MOTION FOR SANCTIONS
AGAINST ATTORNEYS BRYAN REO, BRETT KLIMKOWSKY, AND KYLE
BRISTOW ACTING IN CONSPIRACY TO DRAFT ADDITIONAL CHARGES UPON
PASTOR LINDSTEDT & LINDSTEDT'S CHURCH THROUGH FRAUDULENT POST-
TRIAL MOTIONS PENDING APPEAL**

COMES NOW the current Defendant Pastor Martin Lindstedt (hereafter in person described as "Pastor Lindstedt") along with Defendant The Church of Jesus Christ Christian / Aryan Nations of Missouri (hereafter "The Church) [none of which are within the proper jurisdiction of this local Lake County Court] to propound in Support of Defendants' Motion some good reasons that far from granting \$4200 to Attorney Brett Klimkowsky that rather this Court should instead sanction under these three attorneys – Bryan Reo, Brett Klimkowsky, and Kyle Bristow -- of the former "White Supremacist Lawfare" corporation on the Board of Directors for

“The Foundation For the MarketPlace of Ideas” or as Pastor Lindstedt calls it “the ZOGbot Poverty Law Center” under Civ. R. 11 and R.C. 2323.51. (Exhibit #1, Board of Directors of FMI).

I. RESTATEMENT OF ANTI-REO REO FACTS

Plaintiff sued Defendant(s) – including Pastor Lindstedt’s elderly illiterate bed-bound domestic partner Roxie Fausnaught and Pastor Lindstedt’s Aryan Nations Church for a campaign of vicious and omnipresent defamation engaged in by Plaintiff Reo because Defendant found out that Bryan Reo was a Satanic homosexual mongrel abomination engaged in bringing to the above-ground Christian Identity Movement which loathes jews, mongrels, and pretty much anything which is not Aryan Christian Israelite a murderous jew former pig named William Finck as a “Greek Scholar” and “Historian” and “Christian Identity teacher” . The fact of the matter was that “Baal Finck” is a jew related to Matt Lauer and Mark Potok of the Southern Poverty Law Center. Even more dire was that Finck, a jailor sergeant in the Jersey City jail murdered a Puerto Rican sneak thief named Arnauldo Ortega who was about to get released for some reason but Finck got another jailer named David Dumers to help murder Ortega, Finck stomped in Ortega’s sternum. Finck managed to stay out of jail thanks to the New Jersey authorities, but was hauled up on federal charges for civil rights violations. So Finck took a plea bargain, testified against Dumers, ruined Dumers’ appeal (See US v Finck, US v Dumers, 135 F3d 767). Finck was then placed in administrative segregation in a mid-level security federal prison and then groomed to become the next great Christian Identity leader to replace Pastor Richard Butler. Bryan Reo, already a known mongrel “white supremacist” was chosen to assist Finck in this infiltration, but the problem is that Bryan Reo is the “Clayton Bigsby” of White Supremacy. Reo would roam the White Supremacist forums and Internet as “SwordBrethren”

delusionally claiming to be a Aryan “Teutonic Crusader” but Pastor Lindstedt found out around Halloween 2010 that “SwordMamzer” – calling “SwordBrethren” a mongrel – was none other than Bryan Reo – who is obviously a mixture of negro, jew, gook and Indian (both dothead & Casino) with slant eyes, a unibrow, shit-skin, and nigger lips. Pastor Lindstedt notified the Movement Internet community of the news that Bryan Reo was back as a ZOGbot. Bryan Reo with the aid of Finck and other ZOGBots took down 10-12 of Pastor Lindstedt’s web pages and a bunch of others like the NIM-Busters – Internet trolls – to where everyone in the White Nationalist and Christian Identity community knew that Bryan Reo was back and working for Finck pretending to not only be White, but one of Eli James’ (another jew pretending to be a CI pastor) and Baal Finck’s sub-pastors. Bryan Reo interfered with an ex-friend’s federal civil lawsuit involving a helicopter crash in 2003 caused by a defective Rolls Royce engine part.

<http://bryanreo->

lawsuits.xyz/2011/Britton_v_RollsRoyce/June11/438_061011_Order_No%20Dismissal.pdf

As a counter Pastor Lindstedt found out that one Bryan Reo driving a 2003 Toyota Landcruiser killed a woman in South Carolina. Over four years later Lindstedt found out that it was another Bryan Reo who drove the very same make and model as this case’s Bryan Reo well after Reo filed the federal lawsuit.

For over three years Reo posted material on Finck’s forum and a blog given Bryan Reo that Pastor Lindstedt was a convicted child molester though knowing differently and Lindstedt kept up some Reo material. Reo was fired as an from the North Perry Nuclear Power Plant presumably after reading about Bryan Reo as a violent wannabe White Supremacist on Pastor Lindstedt’s web pages. For the remainder of 2011 Pastor Lindstedt would take down material Reo provided to the Internet on a free speech provider. In 2012, 2013, and 2014 Reo threatened

litigation against the Internet provider which had immunity as an ISP. Reo found out that Lindstedt had property in South Dakota that it could steal through litigation sometime in 2014 so it filed a federal lawsuit for \$10.75 million after taking down the libelous “Pastor Lindstedt is a convicted child molester” material. The Ohio Statutes of Limitation on Defamation are one year from the alleged defamation, not from when Bryan Reo decided to file a federal lawsuit three years later and then after losing the federal lawsuit five years later. This current lawsuit as a matter of settled Ohio appellate law needs to be dismissed.

Singh v. ABA Publishing, (Ohio Ct. App. 2003), an individual brought a defamation claim based on a magazine story that accused him of sexual harassment. The court held that Ohio’s one-year statute of limitations begins to run at the time the defamatory words “are written or spoken, not when the plaintiff became aware of them.” *Id.* at ¶ 22.

<http://www.strausstroy.com/practice-areas/litigation/defamation-statute-of-limitations-act-quickly-before-its-too-late/>

(The above cite was discovered by Pastor Lindstedt on 4 Sept 2019 while googling about Ohio Statutes of Limitation for Defamation. Doubtless Bryan Reo and this Court knew about this insurmountable legal obstacle to continuing with the case much less holding the trial for years, showing their absolute contempt for the law and for judicial and legal ethics.)

Bryan Reo was suing as a professional plaintiff before this Lake County court before Reo found out Lindstedt had property in South Dakota (Pray for My Success wherein Reo wants to make Lindstedt penniless already presented as an exhibit many times before). Reo moved into the area of White Supremacy associated with the Alt-Right and was a founding member of the “Foundation for the MarketPlace of Ideas” (FMI) as admitted at trial and in Exhibit #1 – Board of Directors for FMI. Between January 2017 and June 2018, Attorney Brett A. Klimkowsky (#0090183) served as the attorney of record for Plaintiff. Indeed, in looking at Bryan Reo’s “Motion for Attorney’s Fees” Word for Windows file Reo sent me via e-mail for July 24, 2019 it

wasn't until August 27th when Pastor Lindstedt hovered his mouse over the sent document that the Word Metadata said that Attorney Kyle Bristow was author (Exhibit #2 Proof that Reo, Bristow and Klimkowsky are acting in collusion against Pastor Lindstedt and Lindstedt's Church as part of the not-quite defunct FMI/ZOGbot Poverty [F]Law Center.) Thus any attempt to claim that Attorney Brett Klimkowsky is due any legal fees when Attorney Klimkowsky has been working in illicit combination and conspiracy with Bryan Reo, Kyle Bristow, and the rest of the FMI as part of a state and federal attempt to infiltrate White Nationalist / White Supremacist organizations in general and Pastor Lindstedt and Lindstedt's Church is not only absurd but fraudulent. Attorney Klimkowsky was merely a signature for Bryan Reo's never-ending frivolous, malicious and vexatious Motions for Summary Judgment, Motions to Strike, and Motions for Sanctions. See Exhibit #3 – Pastor Martin Lindstedt's Affidavit of 29th August 2019.

Between January 2017 and June 2018, Plaintiff Reo was inundated with ridiculous responses from Pastor Lindstedt responding to Reo's flagrantly frivolous court filings concerning Motions for Summary Judgment, Motions to Strike and the most idiotic was a Motion in Limine to Prevent Defendant from being able to testify on his own behalf on the grounds of insanity. If Pastor Lindstedt was too insane to testify then that would presuppose Pastor Lindstedt was too insane to be sued for defamation after winning the federal lawsuit against himself. This idiotic Motion in Limine was submitted by Plaintiff under the signature of his FMI sidekick Brett Klimkowsky for the sole purpose of harassing Pastor Lindstedt and getting to steal Lindstedt's inheritance under color of law. The worst such filings submitted by Defendant was:

5/25/2017 Motion to add Bryan Reo's Co-Conspirator Father Anthony D Reo as a party to the consolidated case irrespective of the Quasi-Legal chicanery by Bryan Reo's and attorney Brett Klimkowsky to defy service upon Bryan Reo's father as a co-defendant of Bryan Reo's abuse of legal process and malicious prosecution of numerous frivolous and vexatious lawsuits against Pastor Lindstedt and his

church, certificate of service, filed. Attorney: PRO SE (Martin Linstedt)

6/5/2017 Copy Defendant's pre-trial statement & request to re-open & set-aside Bryan Reo's fraudulent & malicious ex parte & in abstentia stalking judgment achieved via perjury & add Bryan Reo's father and ohio lawyers to the trial, certificate of service, filed Attorney: PRO SE (Martin Linstedt)

6/12/2017 (COPY) MOTION UNDER OHIO RULE OF CIVIL PROCEDURE RULE 11 AND R.C. 2323.51(A) TO SANCTION BRYAN REO AND BRYAN REO'S ATTORNEY BRETT A. ICLIMKOWSKY FOR FILING A PERJUROUS AND LAWLESS MOTION IN LIMINE TO PREVENT PASTOR LINDSTEDT VIA A FALSE CLAIM OF INSANITY FROM TESTIFYING ON HIS AND HIS CHURCH'S BEHALF AND AGAINST BRYAN REO'S MALICIOUS, FRIVOLOUS AND ABUSIVE PROSECUTION OF NUMEROUS FRIVOLOUS AND VEXATIOUS LAWSUITS ABSENT CAUSE OR JURISDICTION AGAINST PASTOR LINDSTEDT AND HIS CHURCH, CERTIFICATE OF SERVICE, EXHIBIT 1-5, FILED Attorney: PRO SE (Martin Linstedt)

The result of Plaintiff Reo's and Lawyer Klimkowsky's barratry was a journal entry of 23 August 2017 wherein Judge Richard Collins disposed of all of the Reo 'law' foolishness and Pastor Lindstedt's counter-filings but with the reservation waiting after trial of "ruling on the motion of defendant Lindstedt under Civ. R, 11 and R.C. 2323.51(A) to sanction plaintiff Reo and his counsel, Brett Klimkowsky, for filing a perjurous and lawless motion in limine to prevent Lindstedt from testifying." See Exhibit #4 -- Journal Entry of Aug. 23, 2017

As mentioned before, Bryan Reo, Brett Klimkowsky and Kyle Bristow were and are founding members of the Foundation for the MarketPlace of Ideas (FMI) / ZOGbot Poverty [F]Law Center (ZbP[f]LC). They were so back in 2017 until their lies and the likelihood of disbarment after March 3, 2018 made them disband this ZOG false flag operation wherein members of this "White Supremacist 'civil rights' lawfare group disbanded. Looking at the history of Bryan Reo, who has always been non-white antifa playing White Supremacist and the

case histories of Kyle Bristow and Brett Klimkowsky their only activity has been for liberal causes and to harass and oppress Pastor Lindstedt and Lindstedt's Church or in staging the Charlottesville Fiasco wherein unknown white men were encouraged to show up at this rally, to be exposed to antifa attack and government persecution through lawfare. These FMI attorneys (Reo, Bristow, Klimkowsky) were used to extort public state universities to spring for hundreds of thousands in security for Richard Spencer to hold rallies for less than 20 skinheads. Reo and Klimkowsky have worked together to defraud and shakedown numerous white-owned family businesses which use the Internet to conduct their business. Reo and Klimkowsky got caught out in fraud in Reo v. National Auto Division 15CV001850 and 16CV000526 in which they were caught filing the same lawsuit after being caught out in fraud at the federal level. Thus ALL these lawyers need disbarment.

On July 24, 2019 Bryan Reo threatened via e-mail Pastor Lindstedt with Motions for Attorney Fees for \$4200 (drafted by Kyle Bristow, Exhibit #2) and with Motion for Sanctions for \$9000. Pastor Lindstedt has NEVER called Bryan Reo by phone and seldom by direct e-mail. Pastor Lindstedt NEVER responds to Reo-law terrorism. Reo filed the Bristow drafted Motion for Attorney fees along with an Affidavit by Klimkowsky about how much Klimkowsky had been hurt by Pastor Lindstedt for being a party to Reo-fraud. A copy of the proceedings from July 24th, 2019 are of course on Pastor Lindstedt's web page. See Exhibit #5.

However back on Nov. 9, 2019 Brett Klimkowsky made two calls to Pastor Martin Lindstedt. One call of 45 minutes from 4:10 – 4:45 pm and then after Klimkowsky saw to its mother another call from 4:46 to 6:35 pm lasting an hour and 50 minutes. In these calls lasting two hours, Pastor Lindstedt got onto Brett Klimkowsky for being Bryan Reo's bitch in putting his signature to the idiotic Motion in Limine especially and telling Klimkowsky to stick to

farming and trucking and getting out of lawyering before Klimkowsky gets disbarred. See Exhibit #6 – Klimkowsky v Lindstedt

The two calls can be heard at:

<http://www.whitenationalist.org/forum/showthread.php?2168-Klimkowsky-v-Lindstedt>

http://bryanreo-lawsuits.xyz/2018/Nov18/9Nov18_KlimkowskyCall/V1104004_9Nov18_410-445pm_Klimkowsky1.mp3

http://bryanreo-lawsuits.xyz/2018/Nov18/9Nov18_KlimkowskyCall/V1104005_9Nov18_446-635pm_Klimkowsky2.mp3

However, the most relevant is at around 4:50 pm on the second call wherein Klimkowsky says “I don’t like making any money at it, I just like helping him (Reo) out because I can.”

[http://bryanreo-](http://bryanreo-lawsuits.xyz/2018/Nov18/9Nov18_KlimkowskyCall/Help%20Reo%204%20Free%20334-354%202d%20call.mp3)

[lawsuits.xyz/2018/Nov18/9Nov18_KlimkowskyCall/Help%20Reo%204%20Free%20334-354%202d%20call.mp3](http://bryanreo-lawsuits.xyz/2018/Nov18/9Nov18_KlimkowskyCall/Help%20Reo%204%20Free%20334-354%202d%20call.mp3)

See also Exhibit #3 – Martin Lindstedt Affidavit of 29 Aug. 2019

Bretrt Klimkowsky didn’t want any legal fees until Bryan Reo either blackmailed him or simply Klimkowsky got greedy.

II. ISSUE PRESENTED

1. Whether the Court should award sanctions in favor of Defendant against Plaintiff Reo and Reo co-conspirator lawyers by dismissing Bryan Reo litigation before it and imposing \$10,000 against Reo, and the amount of four thousand two hundred dollars (\$4,200.00) against Bryan Reo lawyers Kyle Bristow and Brett Klimkowsky and disbarments for all three lying lawyers.

Plaintiff’s Anticipated Response: No.

Defendant’s Definite Response: Yes.

III. LAW & ARGUMENT

Plaintiff incurred no real fees until Reo decided to go for the gold in harassing Pastor Lindstedt and Lindstedt's Church. While Mr. Klimkowsky served as Plaintiff's attorney-of-record, all he wanted to do was "I don't like making any money at it, I just like helping him (Reo) out because I can." Now Klimkowsky got back in and should be punished.

R.C. § 2323.51 and Civ.R. 11 should be used against Bryan Reo and Kyle Bristow and Brett Klimkowsky for their fraudulent actions under color of law against Pastor Lindstedt and Lindstedt's Church. With regards to the copious number of pages of court filing submitted by Defendant—and responded to by Mr. Klimkowsky—while Mr. Klimkowsky served as Plaintiff's attorney-of-record and filed all these preposterous Motions drafted by Bryan Reo and/or Kyle Bristow and merely signed these papers, Mr. Klimkowsky should be terminated from the legal profession.

IV. CONCLUSION

For the reasons set forth herein, Defendant asks that this local Ohio Court without any jurisdiction over Pastor Lindstedt and Lindstedt's Church but with the power to award sanctions against Bryan Reo and Reo's fellow co-conspirator lawyer barraters Kyle Bristow and Brett Klimkowsky will dismiss the lawsuit against Defendants in total because the *Singh v. ABA Publishing* (Ohio Ct. App. 2003) decision states that Bryan Reo can't wait three years to file a defamation case for what was said on Lindstedt web pages from 2010, 2011, and 2013 in federal court and have the lost federal case act as some sort of refrigerator for spurious claims. Bryan Reo should be sanctioned for \$10,000 and Attorneys Brett Klimkowsky and Kyle Bristow (who drafted this fraudulent Motion (Exhibit #2) should each be sanctioned in the amount of four

thousand two hundred dollars (\$4,200.00), which is the very amount Bryan Reo wants from Pastor Lindstedt. All of these shyster lawyers should be disbarred.

Hail Victory !!!

Martin Lindstedt Pastor CTC/AN
P

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*Pro se Defendants outside this Court's
jurisdiction*

Dated: September 4, 2019

Certificate of Service

I, Pastor Martin Lindstedt do hereby certify that a true and genuine copy of the foregoing has been dispatched by United States mail to the Plaintiff Bryan Reo at:

Bryan Reo (& Anthony D. Reo, Bryan Reo's Father / Co-conspirator), 7143 Rippling Brook Lane, P.O. Box 5100, Mentor Ohio 44061.

X Martin Lindstedt Pastor CTEC LNP 4 Sept 2019