



8. In an effort to collect the judgment that I have against Martin Lindstedt, I have previously served him with post-judgment interrogatories.

9. In response to those interrogatories and in subsequent court filings in Ohio federal court, Martin Lindstedt as indicated to me and the court that he has no significant assets and he has divested himself entirely of the South Dakota land in Stanley County.

10. Martin Lindstedt has also advised the federal court in Ohio that he closed the last of his bank accounts on the day judgment was entered against him.

11. Based on the information and belief available to me at this time, the South Dakota land in Stanley County is the only asset that Martin Lindstedt owned capable of satisfying the judgment I have against him at this time..

12. I have two pending federal civil cases against Martin Lindstedt, and there are also similar cases filed against him by my wife and my father.

13. The aggregate amount of these claims exceeds two million dollars.

14. It is likely that I will be awarded additional judgments against Martin Lindstedt as he faces a pending summary judgment motion, and potential default ramifications in the state of Ohio in those civil actions.

15. If the court does not grant this temporary restraining order, it is my belief that Martin Lindstedt or his sister Susan April Bessman will continue to engage in fraudulent transfers of assets to evade impending collection attempts on my registered foreign judgment and my pending federal cases.

16. I face irreparable harm should the Stanley County land be transferred again to a bona fide purchaser. I also face irreparable harm should a financial institution or other person encumber the property by mortgage or other encumbrance.



17. Based on the timeline at fourth in the complaint in matter, it is clear that Defendant Martin Lindstedt fraudulently conveyed to his sister a significant financial asset just days after being served with additional civil lawsuits.

18. Based on my information and belief, neither of the defendants reside on the property.

19. Based upon written pleadings and Martin Lindstedt's statements to the Court, he has intentionally divested himself of his assets to avoid collection.

20. Martin Lindstedt has a documented history of follow court orders in the stat of Ohio.

21. Martin Lindstedt has a history of retaliatory pleadings and financial actions in my experience with him in the court system.

22. Without the requested injustice relief, I will suffer immeasurable and a repairable harm in the following particulars:

A. It will be increasingly difficult if not impossible to undo future transactions should either of the defendants continue to transfer or encumber the land. Should the land be transferred again, additional defendants and actions to clear title would be necessary if not impossible to undo depending on who is the transferee.

B. It is also likely that future buyers, transferees, financial institutions, or other unknowing persons could be injured as a result of the failure of defendants to disclose the fraudulent nature of the October 25, 2019 land transaction.

C. I have pending federal litigation against Martin Lindstedt with aggregate claims in the amount of \$1,500,000 dollars; for these claims are not yet completely resolved.

D. The amount of damages to be awarded to me in the future is unknown at this time but given that I have prevailed against him in federal court on similar allegations, I

believe it is very likely that I will prevail again and be awarded monetary judgment Martin Lindstedt.

Wherefore, I request that this Court issue a temporary restraining order and preliminary injunction until the controversy complained of in our Complaint is adjudicated.

Dated this 18 day of February, 2020.

Bryan Reo

Bryan Reo  
Plaintiff

IN WITNESS WHEREOF, I hereunto set my hand and affixed my official seal.

Subscribed and sworn to before me this 18<sup>th</sup> day of February, 2020.

Bethany Hess  
Notary Public - State of Ohio

My commission expires: 10/08/2023

(SEAL)



BETHANY HESS  
NOTARY PUBLIC  
STATE OF OHIO  
Recorded in  
Lake County  
My Comm. Exp. 10/8/2023