

IN THE COURT OF APPEALS
ELEVENTH APPELLATE DISTRICT
LAKE COUNTY, OHIO
CASE NO. 2019-L-073

FILED
COURT OF APPEALS

MAY 14 2020

MAUREEN C. KELLY
CLERK OF COURT
LAKE COUNTY, OHIO

BRYAN ANTHONY REO,

Plaintiff-Appellee,

vs.

Case # 15CV001590 (Trial Court)

MARTIN LINDSTEDT,

Defendant-Appellant.

CASE NO. 2019-L-074

BRYAN ANTHONY REO,

Plaintiff-Appellee,

vs.

Case # 16CV000825 (Trial Court)

THE CHURCH OF JESUS CHRIST CHRISTIAN /

ARYAN NATIONS OF MISSOURI, et. al.,

Defendant-Appellant.

**ASSIGNMENTS OF ERROR AND APPELLANT REPLY BRIEF OF PASTOR
MARTIN LINDSTEDT AND THE CHURCH OF JESUS CHRIST CHRISTIAN / ARYAN
NATIONS OF MISSOURI, (IF ALLOWED) DEFENDANTS-APPELLANTS**

(Oral Argument Neither Wated Nor Requested)

**MARTIN LINDSTEDT, CHURCH OF JESUS CHRIST
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Plaintiff-Appellee

REPLY STATEMENT OF THE CASE

PROCEDURAL POSTURE

This is an appeal of *Bryan Anthony Reo v. Martin Lindstedt*, 15CV001590 and *Bryan Anthony Reo v. The Church of Jesus Christ Christian / Aryan Nations of Missouri* 16CV000825 in which after a jury trial a Lake County jury awarded \$40,000 in compensatory damages and \$50,000 in punitive damages in favor of Bryan Reo against Defendant Pastor Martin Lindstedt and \$15,000 for “false light” damages awarded Bryan Reo against Pastor Lindstedt. The Church of Jesus Christ Christian / Aryan Nations of Missouri was assessed \$200 in compensatory damages and \$200 in punitive damages in favor of Bryan Reo. These cases were consolidated for trial under 15CV001590. This is a reply brief to Bryan Reo’s Appellee Brief of 4 March 2020 which was full of lies both as to the facts and the law. Since it is supposed to be 10 pages or less, Pastor Lindstedt and Pastor Lindstedt’s Aryan Nations Church is not going to bother putting in an Appendix or Table of Contents for what is really just a reply brief due today, 14 March 2020.

For the past eleven years Pastor Lindstedt has been documenting that Bryan Reo is literally a homosexual mongrel agent provocateur (i.e. a mamzer faggot ZOGBot) working to insinuate jews and other mongrels and ZOGBots into the White Supremacist and Christian Identity Racial Resistance Movements. Bryan Reo has called Pastor Lindstedt a convicted child molester. Sometime in 2013 or early 2014 Bryan Reo found out that Pastor Lindstedt had a South Dakota inheritance of 1800 acres worth \$2 million and Reo and its lawyer friends decided to go get it through federal litigation and then when the federal case was dismissed before the

Lake County court system which has no jurisdiction or dominion over Pastor Lindstedt and Lindstedt's Church. The Lake County Court is simply a kangaroo kort unworthy of any respect whatsoever. It saddled Pastor Lindstedt with an African she-nigger and seven gliberal whiggers. It allowed Bryan Reo to hide its past pseudo White Supremacist past (which is still not past). The crooked judge disallowed Pastor Lindstedt to present any of his evidence but allowed Bryan Reo – who did not present any exhibits to Pastor Lindstedt before trial – to cherry pick out of context parts of Pastor Lindstedt's Church's web pages. None of Reo's claims were within the one-year time limit mandated by the Ohio Statutes of Limitations. All of Reo's claims were and are lies.

REPLY STATEMENT OF FACTS

Plaintiff Bryan Anthony Reo has submitted in its Appellate Brief a packet of lies of both fact and law. The trial court restricted Reo to stating claims made after 9/18/2014 about what turned out to be a different Bryan Reo driving the same make of 2003 Toyota when Pastor Lindstedt's last publishing of this honest mistake was in April 2014 when Reo initiated the federal lawsuit which failed because Reo couldn't prove any damages, much less \$10.75 million. Insofar as mentioning that Bryan Reo was fired from the North Perry Nuclear Power Plant in early 2016 this was speculated that they found out that Bryan Reo was a non-white "White Supremacist" and didn't want this delusional critter seen working for them, not for any claims of sabotage, although Bryan Reo loves to make threats. After 11 years of fighting with Bryan Reo and seven years of spurious litigation with no end in sight, Reo still claims that it cannot understand Pastor Lindstedt's legal arguments.

REO LAW & REO ARGUMENT

Bryan Reo claims that Pastor Lindstedt and Lindstedt's Aryan Nations Church has no appealable issue because Pastor Lindstedt is appealing the denial for a new trial. Pastor Lindstedt and Pastor Lindstedt is rather saying that this fraudulent trial for fighting with a public figure and agent provocateur Bryan Reo should never have taken place in the first place given that this Lake County Court never had jurisdiction and has committed the treasonable activity of claiming dominion over Pastor Lindstedt and Lindstedt's Church for calling Bryan Reo and Reo's fellow ZOGbots out. Bryan Reo claims that this Court had jurisdiction because Pastor Lindstedt did not want Bryan Reo to get a default judgment against Pastor Lindstedt, Roxie Fausnaught and The Church of Jesus Christ Christian / Aryan Nations of Missouri. By this corrupt Lake County Court usurping jurisdiction under a "long-arm" statute over those who never consented to such jurisdiction then the proper response is to wage civil racial holy war and get out from the false dominion over Pastor Lindstedt and Lindstedt's Church. The attitude of Lake County is that Bryan Reo as a lawyer can file lawsuit after lawsuit against Pastor Lindstedt and that Pastor Lindstedt and Lindstedt's Church must submit. Pastor Lindstedt nor Pastor Lindstedt's Aryan Nations Church DO NOT CONSENT to this fraudulent and vicious jurisdiction any more than the State of Ohio and Lake County having claimed jurisdiction akin to that of Sodom and Gomorrah and the other Cities of the Plain enjoyed the fire and brimstone from YHWH for their similar exercise in fraudulent jurisdiction. Insofar as Bryan Reo claiming that the Appeals Court must be unanimous in overturning the verdict due to "weight of evidence" since Bryan Reo presented no evidence other than what the corrupt judge Condon allowed him to cherry-pick

from Pastor Lindstedt's web page and which evidence favoring Pastor Lindstedt and his Church was not allowed. This case had no evidence to speak of presented & in any case the subordinate Ohio Constitution Art. 4, Section 3(B)(3) does not over-ride the First Amendment nor jurisdictional issues. Bryan Reo purports to claim in its Statement of Issues Presented for Review that it answers Pastor Lindstedt's Appellate Brief – but without the politically incorrect manner and far more concisely. However, all Bryan Reo does is to essentially lie about the facts and law

FIRST ASSIGNMENT OF ERROR – JURISDICTION. Neither the Lake County Courts nor Bryan Reo ever had jurisdiction over Pastor Lindstedt, Lindstedt's elderly bed-bound illiterate domestic partner nor Lindstedt's Aryan Nations Church living in SW Missouri 900 miles away, be it by virtue of some Ohio "long-arm" statute claiming jurisdiction or some Ohio case law usurping said false dominion / jurisdiction or by virtue of holding Pastor Lindstedt's and Lindstedt's Aryan Nations Church's property hostage by means of fraudulent default judgment. Pastor Lindstedt is fighting this matter before this appeals court at present, but it is inevitable that this judicial misconduct calls for retaliatory racial and religious civil warfare unto extermination. Pastor Lindstedt has a great deal of influence within the Racial Resistance Movement and this tyranny means that it is foolish to assume that White People can be free while this area of the Empire is able to render false judgment over rural Southern whites, any more than in the First Civil War. Ohio delenda est, especially NorthEast Ohio and the non-white inhabitants thereof.

SECOND ASSIGNMENT OF ERROR – NEGATING PREMPTORY CHALLENGE OF AFRICAN NEGRESS. Pastor Lindstedt freely admits to making a challenge for cause and peremptorily against this African negress who came to this country to live off the White man

because Pastor Lindstedt doesn't consider them anything other than Sixth-Day Beasts of the Field without souls and if Satanic mongrel abominations like Bryan Reo to be literally like jews as the Spawn of Satan. Ohio fought a First Civil War against Missouri in order to "free" such creatures to live off the White Man. The negress would watch with a glare against Pastor Lindstedt, doubtless influencing the seven other gliberal whiggers on the Lake County ~~Lynch~~ ~~Mob~~ jury. She probably figured out that Bryan Reo was a homosexual mongrel formerly pretending to be a White Supremacist, but knew Pastor Lindstedt was a genuine racist White Devil in a White Devil Aryan Nations Church. And while the current ZOG-Law says that Pastor Lindstedt cannot kick the niggers out of the jury pool, the end result is that White Supremacist Open Lynch Tribunals are hereby legitimized upon the breakup of this Mighty Evil Empire. The only reason to allow niggers to live upon the New Order of Ten Thousand Warlords is to have them act as cannibalistic rape-juries for gliberal whigger lawyers, judges, piglice of the Old Regime. Any law can be perverted to act as a tribunal for the powerful as this law was.

THIRD ASSIGNMENT OF ERROR – JUDGE CONDON NOT ALLOWING EVIDENCE

Bryan Reo always played games with discovery, refusing to give Pastor Lindstedt any discovery when anything Pastor Lindstedt said was on the Church web page for everyone to see. Insofar as an alleged failure to comply with the pre-trial order to exchange exhibits, Bryan Reo didn't obey any such order either. Pastor Lindstedt has pointed out in his Appellate Brief that Judge Condon refused to rule on Defendant's Instant Motion Regarding Trial Exhibits (T.d. 162) pointing out that neither Bryan Reo nor Pastor Lindstedt exchanged exhibits and thus no exhibits should be allowed, but if Bryan Reo was allowed to cherry-pick from Pastor Lindstedt's Church's web

page that Pastor Lindstedt be allowed to rebut such evidence as well. Bryan Reo keeps on hypocritically mentioning Pastor Lindstedt's evidenciary faults, but not Reo's own. Reo also would claim – like in its federal litigation – that since Pastor Lindstedt didn't answer Reo while Reo refused to render initial disclosures or give discovery, that Reo somehow got an admission of guilt. The trial court asked Reo if he had made any such objections at the time and Reo admitted to not doing so, thus the trial court refused to take Reo's claims of admissions seriously.

Insofar as Reo claiming that the trial court properly sanctioned Pastor Lindstedt for Lindstedt being late and not allowing the numerous audio files of Reo playing White Supremacist (400 shows, NOT 400 hours) are concerned, Bryan Reo pretended that of all the hundred thousand homosexual mongrels in the Cleveland area, that Pastor Lindstedt and Lindstedt's Church picked on Bryan Reo as a private figure, not a name [non-white] White Supremacist. Listening to Bryan Reo yawping with Bill Finck and Eli James about killing all the jews and niggers, Racial Holy War Now would have impeached Bryan Reo's credibly to hear Reo lie. Yet Judge Condon used Pastor Lindstedt being late for 20 minutes and hiding for 9 minutes to justify not allowing Pastor Lindstedt to present his evidence is merely judicial corruption. Either Judge Condon would allow Pastor Lindstedt to present his evidence or not. Corruption is not a proper sanction as Reo claims. Judge Condon at T.d 199, transcript pg 232 & 233 Day 1 initially promised to listen to the audio files in chambers while Bryan Reo as in its Appellee Brief claims that he didn't do hundreds of shows – 400 at least – in Reo's distinctive “mamzer monotone.” In short Reo lies.

FOURTH ASSIGNMENT OF ERROR – Bryan Reo merely gives an argument but refuses to make any citation to the trial record – merely claims that Pastor Lindstedt is wrong without proof

FIFTH ASSIGNMENT OF ERROR – Bryan Reo claims that Defendant Lindstedt and Lindstedt's Church got the New York Times v. Sullivan jury instruction. This is a lie, Reading the transcript T.p. 199 Day 3 pg 568 line 18-21 "*In deciding whether the statement was false, you may not consider the defendant's belief as to the truth of the statement.*" This is the exact opposite of the Sullivan standard in that the corrupt trial judge told the jury to disregard whether Pastor Lindstedt thought that the statements were true and in violation of Ohio Constitution Article 1.11 concerning Freedom of Speech and the Press and stating that honest motives are a defense. In any case, *New York Times Co. v. Sullivan* 376 U.S. 254 is not a proper jury instruction but rather a bar to prosecution by a public figure, especially an agent provocateur like Bryan Reo against another public figure within the White Supremacist Movement like Lindstedt and Lindstedt's Aryan Nations Church. Furthermore, Bryan Reo lies when Reo claims that while Pastor Lindstedt found out later in Oct. or Nov. 2014 that it was a different Bryan Reo who drove the same make of 2003 Toyota Landcruiser who killed Catherine Williams that Pastor Lindstedt continued to publish that it was the Mentor Bryan Reo. That is a knowing lie because the last time Pastor Lindstedt published that public news story was in April 2014, just before Bryan Reo filed the federal lawsuit against Lindstedt for violation of the Digital Millennium Copyright Act. Which was well before the Sept. 18 2014 Statute of Limitations deadline imposed by Judge Condon. Bryan Reo thus commits two misstatements of fact and law. Insofar as Bryan Reo's claim of "false light" barred by *New York Times v. Sullivan*, all Pastor Lindstedt was doing was speculation that the nuclear power plant officials fired Reo because Reo was a pretend white supremacist, not because of any statement that Reo sabotaged the reactor core. More Reo lies.

SIXTH ASSIGNMENT OF ERROR – Bryan Reo gets to call Pastor Lindstedt a child molester and Judge Condon allows it before the jury. Pastor Lindstedt covered this matter in his Appellate Brief. Yet Bryan Reo and Reo's lawyer friends continue to call Pastor Lindstedt a child molester in the latest Reo litigation while whining about Lindstedt calling Reo a homosexual mongrel ZOGBot. Reo claims that this is mere argumentation allowed by the judge. The fact of the matter is that Bryan Reo is a homosexual mongrel ZOGBot pretending to be a White Supremacist while Pastor Lindstedt is not a child molester. Thus Reo libeled Lindstedt.

SEVENTH ASSIGNMENT OF ERROR – Ohio Statutes of Limitations. Bryan Reo took three years after Lindstedt called Reo a homosexual mongrel abomination ZOGBot in 2010-2011 until Reo found out that Lindstedt had a South Dakota inheritance worth \$2 million which Reo wanted. Lindstedt has posted Reo's 24 August 2014 "Prey for Muh Suckcess" to the record on trial of this and all of Reo litigation to show Reo abuse of legal process. So when Reo had its federal case dismissed Reo went to Lake County to refile stripped of the DMCA. Reo claimed that he had a "saving statute" which was negated by *Portee v. Cleveland Clinic Found*, 155 Ohio St. 3d (2018). However Reo lies about when the Catherine Williams killing was re-published in April 2014. Insofar as the rest of the *Reo v. Aryan Nations* 16CV000825 matter Reo lies because none of that stuff regarding the North Perry Nuclear Power Reactor was mentioned in the Mentor Municipal Court filing. Reo was pretending to be a great White Supremacist for the Foundation for the MarketPlace of Ideas so when that went allegedly defunct in March 2018 Reo tried to File an Amended Complaint nearly two years after the fact, thus barred by Ohio Statute of Limitations. Judge Collins refused to allow Reo to Amend his Complaint after over three years

and numerous Reo-cancelled court dates, (T.d. 145, 17 Dec. 2018) so Reo filed appeals 2018-L-143 & 2018-L-2019. Thus Bryan Reo's evasions of the Ohio Statutes of Limitation are lies.

EIGHTH ASSIGNMENT OF ERROR – Court collusion with Bryan Reo allowing Reo to file this frivolous litigation without consequence. Bryan Reo is a legal terrorist and Judge Condon is Reo's state sponsor. Pastor Lindstedt tried, as Lindstedt had in the federal case(s) to counter-sue Bryan Reo and Reo co-conspirators for abuse of legal process. Judge Condon refused to allow any such counter-suits, thus making Bryan Reo have a free shot to steal under color of the corrupt Lake County courts Lindstedt's property. Suffice it to say that such should be discouraged, not encouraged, but Bryan Reo and Reo's lawyers are using these corrupt Ohio courts to steal and rob Pastor Lindstedt (and others) through abuse of legalistic process.

NINTH ASSIGNMENT OF ERROR – Pastor Lindstedt can and did get an ecclesiastical court to render a \$400 billion judgment, Letter of Marque, Decree of gelding & enslavement, Order of "Quantrillization" and other relief from a Revolutionary Drumhead Tribunal. In short, this court has violated the 1865 First Civil War Armistices, the 1648 Treaty of Westphalia, and the so-called U.S. and Ohio Constitutions and is running a competing court in which the lawyers involved claim that it takes one of their officers to represent an Aryan Nations Church, which is founded by Jesus Christ Christian and thus beyond their jurisdiction. There are risks given that this Court and the State of Ohio have initiated a racial and religious Second Civil War

CONCLUSION - Bryan Reo with the aid of this corrupt Lake County Court and Judge Patrick Condon encouraged and allowed a homosexual mongrel ZOGbot and ZOGbot lawyer friends Kyle Bristow and Brett Klimkowsky to pursue a malicious and vexatious lawsuit against Pastor

Lindstedt, Pastor Lindstedt's woman Roxie Fausnaught, and Pastor Lindstedt's Church of Jesus Christ Christian / Aryan Nations of Missouri in violation of their professed U.S. and Ohio Constitutions and law for a bogus defamation trial against Defendants over whom this Court and State of Ohio had neither dominion nor jurisdiction. In doing so they haven't even pretended to obey any rule of law but rather rule of lawyer before other lawyers. They have re-started a civil racial and religious war. It is stupid and ineffective to allow the State of Ohio and its courts to continue to live given that they won't allow us rural White Supremacists to live in peace. Given that is now a Collapse which will leave most of the Ohio population dead and end the State of Ohio as a governmental entity, and the lawyers, judges, politicians, police and their families put to the sword and/or enslaved all Pastor Lindstedt is trying to do is to wait it out by filing this appeal. What Pastor Lindstedt wants is recognition that Lake County courts never had jurisdiction to try this case, for it to be dismissed, to pay Pastor Lindstedt and Lindstedt's Church reparations, and to disbar Bryan Reo and Reo's lawyer friends and fellow ZOGBots Kyle Bristow and Brett Klimkowsky or to turn them over along with their families for punishment due aliens and traitors. Insofar as forwarding what Pastor Lindstedt writes and advocates to the Lake County Prosecutor's Office and FBI Bryan Reo is a known informant although Reo has fantasized about killing them back in Dec. 2007 on the White Supremacist Stormfront Forum.

Hail Victory !!!

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PROOF OF SERVICE

Thanks to the Covid-19 ZOG-virus this 11th Appellate Court was e-mailed an original of this Reply Appellant Brief to 11thappeal@lakecountyohio.gov on 14 May 2020 via the Lake County Clerk, 25 N. Park Place, Painesville, Ohio 44077 as instructed.

A like copy was e-mailed an original of this Reply Appellant Brief on May 14, 2020 and will be sent a copy via standard US Mail to:

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A copy of the foregoing was e-mailed to Attorneys Kyle Bristow (BristowLaw@gmail.com) and Brett Klimkowsky (brett1066@gmail.com), Lawyers for the Lake County Courts and Judge Patrick Condon Lindsey Upton (lupton@mojolaw.com) and Lisa Zaring (lzaring@mojolaw.com) and lawyers for the State of Ohio Michael Walton (Michael.Walton@ohioattorneygeneral.gov) and Halli Watson (halli.watson@ohioattorneygeneral.gov) who are being sued in other Reo v. Lindstedt federal litigation involving Bryan Reo's never-ending defamation lawsuits against Pastor Lindstedt and his Church.

Bryan Anthony Reo v. Martin Lindstedt 1:19-cv-02103-SO

Bryan Anthony Reo v. Martin Lindstedt 1:19-cv-02589-CAB ← **This one**

Anthony Domenic Reo v. Martin Lindstedt 1:19-cv-02615-JRA ← **This one**

Stefani Rossi Reo v. Martin Lindstedt 1:19-cv-02786-CAB ← **This one**

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