

IN CIRCUIT COURT
SIXTH JUDICIAL CIRCUIT

58CIV20-000007

**) AFFIDAVIT OF PLAINTIFF BRYAN REO
) IN SUPPORT OF MOTION FOR SUMMARY
) JUDGMENT AND STATEMENT OF
) UNCONTROVERTED FACTS**

**MARTIN LINDSTEDT and
SUSAN APRIL BESSMAN, as
Trustee of the Susan April Bessman
Revocable Living Trust,**

Defendants.

Plaintiff, Bryan Reo, being first duly sworn under oath, deposes and states as follows:

1. I am the plaintiff in the above captioned matter.
2. I have reviewed each and every paragraph contained in the Statement of Uncontroverted Facts in this matter.
3. Each and every factual statement made in the Statement of Uncontroverted Facts is true and accurate to the best of my knowledge and belief.
4. The purpose of my application for summary judgment is not made for the purpose of delay, or any other improper purpose, but rather to resolve a case that is ripe for decision as there are no material facts genuinely at issue.
5. In 2015 and 2016, I commenced civil actions against Defendant Martin Lindstedt in the Court of Common Pleas, in Lake County, Ohio. The file numbers for these actions are "15 CV

001590" and "16 CV 000825" respectively. These two matters were consolidated for trial, and the two matters were tried to a jury in June of 2019. The jury returned a verdict in favor of me, in the amount of \$105,000.00 and \$400.00 for a combined total of \$105,400.00. The date of the jury verdict in this case was June 26, 2019.

6. I currently hold valid Ohio judgments against the defendant Martin Lindstedt in the aggregate amount of \$105,400.00 as a result of that jury verdict.

7. I promptly domesticated this Ohio Lake County judgment in Stanley County, South Dakota, following applicable South Dakota law. The one hundred five thousand four hundred dollar (\$105,400.00) judgment was docketed and filed in 58CIV19-35 in Stanley County on August 19, 2019. The statutory rate of interest in South Dakota is 10% per annum, and the current payoff with interest as of the date of filing this affidavit is approximately \$125,786.96. This judgment is valid, enforceable, and unsatisfied as of the date of this affidavit, with no payments being made by either defendant toward the judgment amount. No order of stay has been signed by any judge in any jurisdiction, and no party has posted any supersedes bond on any matter now pending. The per diem interest is \$28.88/day.

8. In an effort to collect the judgment that I have against Martin Lindstedt, I have previously served him with post-judgment interrogatories. These interrogatories were served upon Defendant Lindstedt on September 6, 2019.

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. Martin Lindstedt also

appeared annoyed by the fact that I “found about about his inheritance” and he demanded to know who told me about his inheritance [the Lindstedt Property].

10. Because Defendant Lindstedt refused to answer the post-judgment interrogatories, I moved the court to compel responses to my interrogatories, and this was done on October 16, 2019, a mere nine calendar days before Mr. Lindstedt would divest himself of the Lindstedt Property.

11. 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.

12. Based on the information available to me at this time, the Lindstedt Property ranch land in Stanley County is the only asset that Martin Lindstedt ever owned capable of satisfying the judgments I have against him at this time.

13. I have one pending federal civil cases against Martin Lindstedt, and there is also a similar case filed by Stefani Rossi Reo against Mr. Lindstedt. Both of these cases are before the Honorable Judge Boyko.

14. I will now address the four civil cases filed against Martin Lindstedt in Ohio District Court that were discussed with this Court at the time of the Preliminary Injunction Hearing:

A. In #1:19 - CV-02103-SO, I filed a lawsuit against Mr. Lindstedt for his defamatory actions and against me. On April 23, 2021, the Honorable Solomon Oliver, United States District Judge, entered a final Judgment Entry in favor of Plaintiff Bryan Reo and against Defendant Martin Lindstedt in the aggregate amount of one million dollars (\$1,000,000.00). I promptly domesticated this federal judgment in Stanley County following applicable South Dakota law. The one million dollar judgment was docketed and filed in 58CIV21-16 on April 30,

2021. The statutory rate of interest in South Dakota is 10% per annum, and the current payoff with interest as of the date of filing this affidavit is approximately \$1,023,835.62. This judgment is valid, enforceable, and unsatisfied as of the date of this affidavit, with no payments being made by either defendant toward the judgment amount. No order of stay has been signed by any judge in any jurisdiction, and no party has posted any supersedes bond on any matter now pending. The per diem interest is \$273.97/day.

B. In #1:19 - CV-02589-CAB, I filed a lawsuit against Mr. Lindstedt for his defamatory actions and against me. On March 29, 2021, the Honorable Christopher A. Boyko, United States District Judge, entered an Opinion and Order in favor of me and against Defendant Martin Lindstedt in the aggregate amount of seven hundred fifty thousand dollars (\$750,000.00). This order has not been reduced to a final judgment, but it is expected that this will be reduced to final judgment in the near future. The Opinion and Order has not been vacated, set aside, or otherwise retracted or modified in any way, and it remains a valid court order as of the date of filing of this affidavit.

C. In #1:19 - CV-02786-CAB, I filed a lawsuit on behalf of my client, Stefani Rossi Reo against Mr. Lindstedt for his defamatory actions toward her. On March 30, 2021, the Honorable Christopher A. Boyko, United States District Judge, entered an Opinion and Order in favor of Stefani Rossi Reo and against Defendant Martin Lindstedt in the aggregate amount of five hundred thousand dollars (\$500,000.00). This order has not been reduced to a final judgment, but it is expected that this will be reduced to final judgment in the near future. The Opinion and Order has not been vacated, set aside, or otherwise retracted or modified in any way, and it remains a valid court order as of the date of filing of this affidavit.

D. In #1:19 - CV-02615-JRA, I filed a lawsuit on behalf of my client and father against Mr. Lindstedt for his defamatory actions toward my father. On April 18, 2021, the Honorable John Adams, United States District Judge, entered a final Judgment Entry in favor of Anthony Reo and against Defendant Martin Lindstedt in the aggregate amount of five hundred thousand dollars (\$500,000.00). This judgment in favor of my father was assigned to me personally. I promptly domesticated this federal judgment in Stanley County, in my name as assignee, following applicable South Dakota law. The five hundred thousand dollar (\$500,000.00) judgment was docketed and filed in 58CIV21-24 on July 2, 2021. The statutory rate of interest in South Dakota is 10% per annum, and the current payoff with interest as of the date of filing this affidavit is approximately \$503,150.68. This judgment is valid, enforceable, and unsatisfied as of the date of this affidavit, with no payments being made by either defendant toward the judgment amount. No order of stay has been signed by any judge in any jurisdiction, and no party has posted any supersedes bond on any matter now pending. The per diem interest is \$136.99/day.

15. Based on my information and belief, neither of the defendants or any other persons has resided on the Lindstedt Property from 1999 through the state of this affidavit.

16. Based upon written pleadings and Martin Lindstedt's statements to the Courts in Ohio, Defendant Lindstedt has intentionally divested himself of his assets to avoid collection.

17. Based upon my research of the filings at the Stanley County Register of Deeds, there are no transfers or intermediate deeds concerning the Lindstedt Property between the time Martin Lindstedt acquired the property on December 11, 1999 and the date that Martin Lindstedt fraudulently transferred the Lindstedt Property to Susan April Bessman on October 25, 2019.

18. Martin Lindstedt has a documented history of failure to follow court orders in the state of Ohio.
19. In my experience with Martin Lindstedt in the court system, he pursues bad faith counter-claims for the purpose of retaliation, and he also attempts to increase the cost of litigation through unnecessary and frivolous filings which also cause delay for the sake of delay.
20. I have reason to believe, based upon statements made to others by Mr. Lindstedt, that he intends to delay this matter as much as possible or file bankruptcy to further dissuade me from collecting on my judgments.
21. Mr. Lindstedt has moved for Pauper Status (Indigent Determination) in Federal file 1:19-CV-02103, and he has been granted the same. In his request, he indicated to the Court by way of signed affidavit that his remaining assets are de minimus compared to the judgments I currently hold against him. Mr. Lindstedt has previously made a similar request to this court.
22. I have employed the services of Terry Liebel, a certified appraiser in Pierre, SD to value the Lindstedt Property. I have received that appraisal, and the Lindstedt property has been appraised at \$1,292,000.00 or roughly \$750.00 per acre.
23. The 2021 assessed value for tax purposes is \$874,416.00.
24. The aggregate amount of the duly filed and docketed Stanley County judgments that I hold against Mr. Lindstedt is approximately \$1,652,773.26 with combined per diem interest of \$439.84/day.
25. I have not received any income whatsoever from the Lindstedt Property since acquiring my significant judgments against Defendant Lindstedt. I am aware that Defendants have been

leasing the Lindstedt Property to third parties and have used the income to finance their defense against my rightful claim.

26. I am attaching to this affidavit true and correct copies of the following documents for the court's review in deciding my pending motion for summary judgment:

A. Copies of the registration of my \$105,400.00 foreign judgment into Stanley county on August 19, 2019 in Stanley Co. file 58CIV19-35.

B. Copies of the registration of my \$1,000,00.00 foreign judgment into Stanley county on April 30, 2021 in Stanley Co. file 58CIV21-16.

C. Copies of the registration of my \$500,000.00 foreign judgment into Stanley county on July 2, 2021 in Stanley Co. file 58CIV21-24.

D. A true and correct copy of the Motion for Pauper Status and accompanying affidavit of Martin Lindstedt, containing a listing under oath of all his assets, filed in The United States District Court of Appeals for the Sixth Circuit in file 1:19 - CV -02103-SO filed on or about July 12, 2021.

E. A copy of the Opinion and Order in file 1:19-CV-02589-CAB sign by the Honorable Judge Christopher A. Boyko authorizing judgment in favor of me against Martin Lindstedt in the amount of \$750,000.00.

F. , A copy of the Opinion and Order in file 1:19-CV-02786-CAB sign by the Honorable Judge Christopher A. Boyko authorizing judgment in favor of Stefani Rossi Reo against Martin Lindstedt in the amount of \$500,000.00.

G. Copies of the Motion to Compel Discovery responses served upon Defendant Martin Lindstedt in Civil file number 15CV001590 and 16CV000285 in Lake County, Ohio, as

well as copies of the requests for discovery (post judgment) and associated correspondence with Defendant, including the Order signed by the Court compelling Defendant to disclose to me a listing of all his land and assets.

H. A copy of the Appraisal of the Lindstedt Property provided to me by appraiser Terry Leibel of Mid-State Appraisal Service, LLC on or about June 30, 2021, showing the appraised value of the property at \$1,292,000.00.

I. A copy of the tax assessed valuation of the Lindstedt property dated July 26, 2021 showing a total assessed value of \$874,416.00

27. To the extent certified copies can be provided at the time of the hearing on the summary judgment motion, I will make those available.

28. I offer this Affidavit, my Verified Complaint on file with the Court, and all previously Affidavits that I have filed in this case in support of my pending motion for summary judgment.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Dated this 26 day of July, 2021.

Bryan Reo
Bryan Reo
Plaintiff

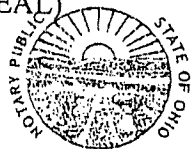
IN WITNESS WHEREOF, I hereunto set my hand and affixed my official seal.

Subscribed and sworn to before me this 26 day of July, 2021.

Eliza Adams
Notary Public - State of Ohio

My commission expires: 4/26/2025

(SEAL)



ELIZA ADAMS
Notary Public
State of Ohio
My Comm. Expires
April 26, 2025

Certificate of Service

The undersigned hereby certifies that on the 26th day of July, 2021 he served a true and correct copy of the Affidavit of Plaintiff Bryan Reo in Support of Motion for Summary Judgment and Statement of Uncontroverted Facts upon the following persons in the following manner:

BY EMAIL TO:

Sarah Baron-Houy
Attorney for Defendant Bessman
sbaronhouy@bangsmccullen.com
By way of Odyssey File and Serve

AND BY USPS MAIL POSTAGE PREPAID TO THE FOLLOWING:

Martin Lindstedt
338 Rabbit Track Road
Granby, MO 64844

Dated this 26th day of July, 2021.

/s/ Robert Thomas Konrad
Robert Konrad

STATE OF SOUTH DAKOTA

)

IN CIRCUIT COURT

COUNTY OF STANLEY

) SS

SIXTH JUDICIAL CIRCUIT

BRYAN ANTHONY REO,
Creditor,

NOTICE OF FILING FOREIGN JUDGMENT

vs.

FILE NO. 58CIV19-000035

MARTIN LINDSTEDT; CHURCH OF
JESUS CHRIST CHRISTIAN ARYAN
NATIONS OF MISSOURI,
Debtor(s).

You are hereby notified that a foreign judgment in the above-captioned matter having originally been entered in the Court of Common Pleas of the County of Lake, state of Ohio, has been filed against you in the Circuit Court of Stanley County, South Dakota, on the 19th day of August, 2019.

The name of the judgment creditor is Bryan Anthony Reo.

The name and address of the judgment creditor's attorney is
Bryan Anthony Reo (Pro se)
PO Box 5100
Mentor, OH 44061.

Dated this 19th day of August, 2019.

/s/ Kelli Sitzman, Clerk of Court
by jspr20201, Deputy Clerk of Court

AFFIDAVIT OF SERVICE BY MAIL

I, Kelli Sitzman, Clerk of Court in Stanley County, State of South Dakota, being sworn, state that a copy of the above Notice of Filing Foreign Judgment was emailed to Bryan Anthony Reo, the creditor, at reo@reolaw.org, and mailed to Martin Lindstedt and Church of Jesus Christ Christian Aryan Nations of Missouri, the debtor, at 338 Rabbit Track Rd, Granby, MO 64844 on the 20th day of August, 2019 by certified mail by depositing said Notice, with sufficient postage, in the United States Mail at the Post Office of the City of Pierre, South Dakota.

/s/ Kelli Sitzman, Clerk of Court
by jspr20201, Deputy Clerk of Court

Signed and sworn to before me on this 19th day of August, 2019.



STATE OF SOUTH DAKOTA
CIRCUIT COURT, STANLEY CO.
FILED

AUG 19 2019

UJS-013

Kelli Sitzman Clerk
By *TJR* Deputy

IN THE COURT OF COMMON PLEAS
LAKE COUNTY, OHIO

FILED
2019 JUL -1 PM 3:55
MAUREEN G. KELLY
LAKE CO. CLERK OF COURT

BRYAN ANTHONY REO

Plaintiff,

vs.

MARTIN LINDSTEDT, et al.

Defendants.

CASE NOS. 15 CV 001590
16 CV 000825

JUDGMENT ENTRY

July 1, 2019

In accordance with the jury verdict of June 26, 2019, judgment is rendered for plaintiff Bryan A. Reo as follows:

(1) On Bryan A. Reo's claim for defamation per se (count one) against defendant Martin Lindstedt, \$40,000 in compensatory damages with an additional amount of \$50,000 awarded as punitive damages.

(2) On Bryan A. Reo's claim for defamation per se (count one) against defendant Church of Jesus Christ, Christian/Aryan Nations of Missouri, \$200 in compensatory damages with an additional amount of \$200 awarded as punitive damages.

(3) On Bryan A. Reo's claim for invasion of privacy - false light (count two) against defendant Martin Lindstedt, \$15,000 in compensatory damages.

(4) On Bryan A. Reo's claim for invasion of privacy - false light (count two) against defendant Church of Jesus Christ, Christian/Aryan Nations of Missouri, no compensatory damages awarded.

The jury found in favor of defendants Martin Lindstedt and Church of Jesus Christ, Christian/Aryan Nations of Missouri on plaintiff Bryan A. Reo's remaining claims.

The jury found in favor plaintiff Bryan A. Reo on defendant Martin Lindstedt's counter-claim for defamation per se.

Costs to be paid by defendants Martin Lindstedt and Church of Jesus Christ, Christian/Aryan Nations of Missouri.

IT IS SO ORDERED.

16JE0825.wpd

STATE OF SOUTH DAKOTA
CIRCUIT COURT, STANLEY CO.
FILED

AUG 19 2019

Kelli Stittman Clerk
By *T&B* Deputy

I CERTIFY THIS TO BE A TRUE COPY OF
THE RECORDS ON FILE IN THE LAKE
COUNTY CLERK OF COURTS OFFICE.

Nikki Battista DEPUTY
MAUREEN G. KELLY, CLERK OF COURTS

8-7-19

PJK
PATRICK J. CONDON
Judge of the Court of Common Pleas

Copies:

Bryan A. Reo, Esq., Reo Law, LLC, P.O. Box 5100, Mentor, Ohio 44061
Martin Lindstedt, pro se, 338 Rabbit Track Road, Granby, Missouri 64844
Church of Jesus Christ, Christian/Aryan Nations of Missouri, 338 Rabbit Track Road, Granby,
Missouri 64844
Roxie Fausnaught, 338 Rabbit Track Road, Granby, Missouri 64844
William Finck, 653 W. 23rd Street, Box 129, Panama City, Florida 32405
William Shawn DeClue, 3 Blanchette Drive, Florissant, Missouri 63031

Final Appealable Order
Clerk to serve
pursuant to
Civ.R. 58(B).

Certificate of Official Capacity

THE STATE OF OHIO, }

LAKE COUNTY, SS. }

I, **Mark J. Bartolotta**, Judge of the Court of Common Pleas, within and for the County of **Lake** State of Ohio, do hereby certify that **Maureen G. Kelly** is the Clerk of said Court, within and for **Lake** County; that said Court is a Court of Record, having a seal, and that as such Clerk, has the legal custody of the Records and Seal; that her attestation is in due form of law, and her signature thereto genuine.

Given under my hand and seal this

August 7, 2019

Mark J. Bartolotta
Judge Mark J. Bartolotta
Presiding Judge

THE STATE OF OHIO, }

LAKE COUNTY, SS. }

I, **Maureen G. Kelly** Clerk of the Court of Common Pleas, within and for the County and State aforesaid, do hereby certify that **Mark J. Bartolotta** by whom the foregoing certificate was signed, is the Presiding Judge of said Court, duly commissioned and qualified and now acting as such.

WITNESS my hand and the seal of
said Court, at Painesville, Ohio, this

August 7, 2019
Maureen G. Kelly
Maureen G. Kelly
Clerk of the Common Pleas Court

Bryan Anthony Reo
P.O. Box 5100
Mentor, Ohio 44061
(Business): (216) 505-0811
(Personal): (440) 313-5893
reo@reolaw.org

Plaintiff, Pro Se

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR STANLEY COUNTY, SOUTH DAKOTA**

BRYAN ANTHONY REO

Plaintiff

v.

MARTIN LINDSTEDT, and
CHURCH OF JESUS CHRIST,
CHRISTIAN/ARYAN NATIONS OF
MISSOURI

Defendants

No.

AFFIDAVIT:

State of Ohio :

County of Lake :

Before me, the undersigned authority, personally appeared BRYAN ANTHONY REO, who after being sworn states:

1. Affiant is the judgment creditor and as such gives this affidavit.
2. In accordance with the jury verdict of June 26, 2019, a final judgment was entered on July 2, 2019 in the Court of Common Pleas of Lake County, Ohio in favor of the Plaintiff Bryan Anthony Reo, as follows: \$105,000 against Defendant Martin Lindstedt and \$400 against Defendant Church of Jesus Christ of Christian/Aryan Nations of Missouri.
3. An authenticated copy of the foreign judgment is submitted with this affidavit.
4. The name of the judgment creditor is Bryan Anthony Reo.
5. The address of the judgment creditor is P.O. Box 5100, Mentor, Ohio 44061.

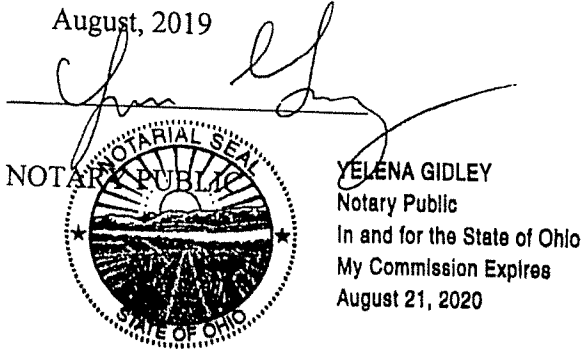
6. The names of the judgment debtors are MARTIN LINDSTEDT and CHURCH OF JESUS CHRIST, CHRISTIAN/ARYAN NATIONS OF MISSOURI.
7. The last known address for MARTIN LINDSTEDT, judgment debtor, is 338 Rabbit Track Road, Granby, MO 64844.
8. The last known address for CHURCH OF JESUS CHRIST, CHRISTIAN/ARYAN NATIONS OF MISSOURI, judgment debtor, is c/o Martin Lindstedt, 338 Rabbit Track Road, Granby, MO 64844.
9. THAT the judgment entered in favor of Plaintiff Bryan Anthony Reo and against Defendants MARTIN LINDSTEDT and CHURCH OF JESUS CHRIST, CHRISTIAN/ARYAN NATIONS OF MISSOURI, entered in the total sum of \$105,400 in the Court of Common Pleas of Lake County, Ohio, is valid, enforceable, and unsatisfied as of this date: August 10, 2019.
10. Defendants have not posted an appeal bond and no stay of execution has been issued on the judgment.
11. I have personal knowledge of the facts and matters stated herein and I am competent to testify as such if called as a witness before any court of law.

FURTHER AFFIANT SAYETH NAUGHT

SWORN AND SUBSCRIBED BEFORE

ME THIS 10th DAY OF

August, 2019



BRYAN ANTHONY REO
Judgment Creditor

STATE OF SOUTH DAKOTA
CIRCUIT COURT, STANLEY CO.
FILED

AUG 19 2019

By Clerk
 Deputy

I Judgment Docket**In The Circuit Court
STANLEY COUNTY****Docket Number:**
58CIV19-000035-01; 2

JUDGMENT DEBTOR	JUDGMENT CREDITOR
MARTIN LINDSTEDT 338 RABBIT TRACK RD GRANBY, MO 64844	BRYAN ANTHONY REO PO BOX 5100 MENTOR, OH 44061
CHURCH OF JESUS CHRIST CHRISTIAN ARYAN NATIONS OF MISSOURI 338 RABBIT TRACK RD GRANBY, MO 64844	BRYAN ANTHONY REO PO BOX 5100 MENTOR, OH 44061

Court Rendered Circuit Court; Circuit Court**Creditor Attorney****JUDGMENT AWARD ACTIVITY**

Type	Amount	Judgment Date	Docketing Date / Time	Filing Date / Time
Judgment	\$400.00	08/19/2019	08/19/2019 3:13 PM	08/19/2019 9:00 AM

Type	Amount	Judgment Date	Docketing Date / Time	Filing Date / Time
Judgment	\$105,000.00	08/19/2019	08/19/2019 3:13 PM	08/19/2019 9:00 AM

Total Amount: \$105,000.00; \$400.00

*** Plus Interest at legal rate until fully satisfied ***; *** Plus Interest at legal rate until fully satisfied ***

ACTIVITY FOLLOWING ENTRY OF JUDGMENT

Date	Description	Debtor	County	Comment

REMARKS:

. ; .

Foreign Judgment



Bryan Anthony Reo
P.O. Box 5100
Mentor, Ohio 44061
(Business): (216) 505-0811
(Personal): (440) 313-5893
reo@reolaw.org

Plaintiff

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR STANLEY COUNTY, SOUTH DAKOTA

BRYAN ANTHONY REO

Plaintiff

v.

MARTIN LINDSTEDT

Defendant

No. 58CIV21-16

AFFIDAVIT:

State of Ohio :

County of Lake :

Before me, the undersigned authority, personally appeared BRYAN ANTHONY REO, who after being sworn states:

1. Affiant is the judgment creditor and as such gives this affidavit.
2. In accordance with the court entering a judgment entry on 4/23/2021 in favor of Plaintiff Bryan Anthony Reo against Defendant Martin Lindstedt in the amount of \$250,000.00 in compensatory damages and \$750,000.00 in punitive damages for a total damages award of \$1,000,000.00 in the case of Bryan Anthony Reo v. Martin Lindstedt, 1:19-CV-02103-SO in the United States District Court for the Northern District of Ohio.
3. An authenticated copy of this Federal foreign judgment is submitted with this affidavit.

4. The name of the judgment creditor is Bryan Anthony Reo.
5. The address of the judgment creditor is P.O. Box 5100, Mentor, Ohio 44061.
6. The name of the judgment debtor is MARTIN LINDSTEDT.
7. The last known address for MARTIN LINDSTEDT, judgment debtor, is 338 Rabbit Track Road, Granby, MO 64844.
8. THAT the judgment entered in favor of Plaintiff Bryan Anthony Reo and against Defendant MARTIN LINDSTEDT, is entered in the total sum of one million dollars (\$1,000,000.) This judgment as entered in the United States District Court for the Northern District of Ohio, located in city of Cleveland, state of Ohio, is valid, enforceable, and unsatisfied as of this date: April 26, 2021.
9. Defendant has not posted an appeal bond and no stay of execution has been issued on the judgment.
10. I have personal knowledge of the facts and matters stated herein and I am competent to testify as such if called as a witness before any court of law.
11. I hereby request that the Clerk of Court in Stanley County file and docket the attached Certified Copy of the Federal Judgment dated April 23, 2021 pursuant to the requirements and directive in SDCL 15-16-28.

FURTHER AFFIANT SAYETH NAUGHT

Respectfully submitted this 26 day of April, 2021.

Bryan Reo

Bryan Anthony Reo
Judgment Creditor

Subscribed and sworn to before me this 26 day of April, 2021.

Eliza Adams
Notary Public
My Commission Expires: 4/26/2025

SEAL



ELIZA ADAMS
Notary Public
State of Ohio
My Comm. Expires
April 26, 2025

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

BRYAN ANTHONY REO, *Pro Se*,

Plaintiff

v.

MARTIN LINDSTEDT, *Pro Se*,

Defendant

) Case No.: 1:19 CV 2103

) JUDGE SOLOMON OLIVER, JR.

) JUDGMENT ENTRY

The court, having granted *pro se* Plaintiff Bryan Reo's ("Plaintiff" or "Reo") Motion for Partial Reconsideration (ECF No. 69), in a separate Order on this same date, hereby enters judgment in favor of Plaintiff and against Defendant. Pursuant to that Order and the court's prior summary judgment Order (ECF No. 44), Plaintiff's Motion for Summary Judgment (ECF No. 34) is granted in its entirety, including as to damages, and *pro se* Defendant Martin Lindstedt's Motion for Summary Judgment (ECF No. 37) is denied. Consequently, the court enters judgment for Reo in the amount of \$250,000 in compensatory damages and \$750,000 in punitive damages.

IT IS SO ORDERED.

/s/ SOLOMON OLIVER, JR.
UNITED STATES DISTRICT JUDGE

April 23, 2021

I hereby certify that this instrument is a true and correct copy of the original on file in my office.
Attest: Sandy Opacich, Clerk
U.S. District Court
Northern District of Ohio

By: _____
Deputy Clerk

STATE OF SOUTH DAKOTA
CIRCUIT COURT, STANLEY CO.
FILED

MAY 03 2021

By Brooke Cronin Clerk
Deputy

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

BRYAN ANTHONY REO, *Pro Se*,

Plaintiff

v.

MARTIN LINDSTEDT, *Pro Se*,

Defendant

) Case No.: 1:19 CV 2103

) JUDGE SOLOMON OLIVER, JR.

) JUDGMENT ENTRY

The court, having granted *pro se* Plaintiff Bryan Reo's ("Plaintiff" or "Reo") Motion for Partial Reconsideration (ECF No. 69), in a separate Order on this same date, hereby enters judgment in favor of Plaintiff and against Defendant. Pursuant to that Order and the court's prior summary judgment Order (ECF No. 44), Plaintiff's Motion for Summary Judgment (ECF No. 34) is granted in its entirety, including as to damages, and *pro se* Defendant Martin Lindstedt's Motion for Summary Judgment (ECF No. 37) is denied. Consequently, the court enters judgment for Reo in the amount of \$250,000 in compensatory damages and \$750,000 in punitive damages.

IT IS SO ORDERED.

/s/ SOLOMON OLIVER, JR.
UNITED STATES DISTRICT JUDGE

April 23, 2021

I hereby certify that this instrument is a true and correct copy of the original on file in my office.
Attest: Sandy Opacich, Clerk
U.S. District Court
Northern District of Ohio

By: [Signature]
Deputy Clerk

STATE OF SOUTH DAKOTA

COUNTY OF STANLEY

)

) SS

)

IN CIRCUIT COURT

SIXTH JUDICIAL CIRCUIT

BRYAN ANTHONY REO

Creditor

vs.

MARTIN LINDSTEDT

Debtor

NOTICE OF FILING FOREIGN JUDGMENT

FILE NO. 58CIV21-000016

To: Martin Lindstedt
338 Rabbit Track Road
Granby, MO 64844

You are hereby notified that a foreign judgment in the above-captioned matter having originally been entered in the United States District Court, Northern District of Ohio, Eastern Division of the County of Cuyahoga, State of Ohio, has been filed against you in the Circuit Court of Stanley County, South Dakota, on the 30th day of April, 2021.

The name of the judgment creditor is Bryan Anthony Reo.

The name and address of the judgment creditor's attorney in South Dakota is:
Robert Konrad, Attorney
1110 E Sioux Ave
Pierre SD 57501

Dated this 3rd day of May, 2021.

/s/ Julie Kilian, Clerk of Court
by JSGE10201, (Deputy) Clerk of Court

AFFIDAVIT OF SERVICE BY MAIL

I, Julie Kilian, Clerk of Court in Stanley County, State of South Dakota, being sworn, state that a copy of the above Notice of Filing Foreign Judgment was mailed to the below-named parties on the 3rd day of May, 2021 by first class mail by depositing said Notice, with sufficient postage prepaid, in the United States Mail at the Post Office of the City of Ft. Pierre, South Dakota.

Bryan Reo
7143 Rippling Brook Lane
PO Box 5100
Mentor OH 44061

Martin Lindstedt
338 Rabbit Track Road
Granby MO 64844

/s/ Julie Kilian, Clerk of Court
by JSGE10201, (Deputy) Clerk of Court

Signed and sworn to before me on this 3rd day of May, 2021.

STATE OF SOUTH DAKOTA

COUNTY OF STANLEY

)

) SS

)

IN CIRCUIT COURT

SIXTH JUDICIAL CIRCUIT

BRYAN ANTHONY REO

Creditor

vs.

MARTIN LINDSTEDT

Debtor

NOTICE OF FILING FOREIGN JUDGMENT

FILE NO. 58CIV21-000016

To: Martin Lindstedt
338 Rabbit Track Road
Granby, MO 64844

You are hereby notified that a foreign judgment in the above-captioned matter having originally been entered in the United States District Court, Northern District of Ohio, Eastern Division of the County of Cuyahoga, State of Ohio, has been filed against you in the Circuit Court of Stanley County, South Dakota, on the 30th day of April, 2021.

The name of the judgment creditor is Bryan Anthony Reo.

The name and address of the judgment creditor's attorney in South Dakota is:

Robert Konrad, Attorney
1110 E Sloux Ave
Pierre SD 57501

Dated this 3rd day of May, 2021.

/s/ Julie Kilian, Clerk of Court
by JSGE10201, (Deputy) Clerk of Court



AFFIDAVIT OF SERVICE BY MAIL

I, Julie Kilian, Clerk of Court in Stanley County, State of South Dakota, being sworn, state that a copy of the above Notice of Filing Foreign Judgment was mailed to the below-named parties on the 3rd day of May, 2021 by first class mail by depositing said Notice, with sufficient postage prepaid, in the United States Mail at the Post Office of the City of Ft. Pierre, South Dakota.

Bryan Reo
7143 Rippling Brook Lane
PO Box 5100
Mentor OH 44061

Martin Lindstedt
338 Rabbit Track Road
Granby MO 64844

/s/ Julie Kilian, Clerk of Court
by JSGE10201, (Deputy) Clerk of Court

STATE OF SOUTH DAKOTA
CIRCUIT COURT, STANLEY CO.
FILED

MAY 03 2021

Brooke Cronin Clerk
By _____ Deputy

Signed and sworn to before me on this 3rd day of May, 2021.

Bryan Anthony Reo
P.O. Box 5100
Mentor, Ohio 44061
(Business): (216) 505-0811
(Personal): (440) 313-5893
reo@reolaw.org

Assignee/Judgment Creditor

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR STANLEY COUNTY, SOUTH DAKOTA

BRYAN ANTHONY REO

Assignee/Judgment Creditor

v.

MARTIN LINDSTEDT

Defendant/Judgment

Debtor

No. 58CIV21-000024

AFFIDAVIT:

State of Ohio :

County of Lake :

Before me, the undersigned authority, personally appeared BRYAN ANTHONY REO, who after being sworn states:

1. Affiant is the Assignee and Judgment Creditor and as such gives this affidavit.
2. In accordance with the court entering a judgment entry on 6/23/2021 in favor of Plaintiff Anthony Domenic Reo against Defendant Martin Lindstedt in the amount of \$250,000.00 in compensatory damages and \$250,000.00 in punitive damages for a total damages award of \$500,000.00 in the case of Bryan Anthony Reo v. Martin Lindstedt, 1:19-CV-02615-JRA in the United States District Court for the Northern District of Ohio.
3. An authenticated copy of this Federal foreign judgment is submitted with this affidavit.

4. The name of the judgment creditor is Bryan Anthony Reo.
5. The address of the judgment creditor is P.O. Box 5100, Mentor, Ohio 44061.
6. The name of the judgment debtor is MARTIN LINDSTEDT.
7. The last known address for MARTIN LINDSTEDT, judgment debtor, is 338 Rabbit Track Road, Granby, MO 64844.
8. THAT the judgment entered in favor of Plaintiff Anthony Domenic Reo and against Defendant MARTIN LINDSTEDT, is entered in the total sum of one million dollars (\$500,000.) This judgment as entered in the United States District Court for the Northern District of Ohio, located in city of Cleveland, state of Ohio, is valid, enforceable, and unsatisfied as of this date: June 28, 2021.
9. THAT the judgment was duly and properly assigned to Bryan Anthony Reo [Assignee] by Anthony Domenic Reo [Assignor] for good and valuable consideration on June 28, 2021. A certified copy of the assignment of judgment is hereby affixed as an attachment. The language of the assignment provides that the original judgment creditor has assigned to Assignee all rights, titles, and interests in said judgment.
10. Defendant has not posted an appeal bond and no stay of execution has been issued on the judgment.
11. I have personal knowledge of the facts and matters stated herein and I am competent to testify as such if called as a witness before any court of law.
12. I hereby request that the Clerk of Court in Stanley County file and docket the attached Certified Copy of the Federal Judgment dated June 23, 2021 pursuant to the requirements and directive in SDCL 15-16-28.

FURTHER AFFIANT SAYETH NAUGHT

Respectfully submitted this 28 day of June, 2021.

Bryan Reo
Bryan Anthony Reo
Judgment Creditor/Assignee

Subscribed and sworn to before me this 28 day of June, 2021.

Eliza Adams
Notary Public
My Commission Expires: 4/26/2025

SEAL



ELIZA ADAMS
Notary Public
State of Ohio
My Comm. Expires
April 26, 2025

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ANTHONY DOMENIC REO,

Plaintiff,
v.

MARTIN LINDSTEDT.,

Defendant.

Case No. 1:19-cv-02615-JRA

Hon. John R. Adams
Mag. Carmen E. Henderson

REO LAW, LLC

Bryan Anthony Reo (#0097470)
P.O. Box 5100
Mentor, OH 44061
(T): (440) 313-5893
(E): reo@reolaw.org
Attorney for Anthony Domenic Reo

MARTIN LINDSTEDT

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

**ASSIGNMENT OF JUDGMENT
AGAINST MARTIN LINDSTEDT**

Plaintiff and Judgment Creditor, Anthony Domenic Reo, Assignor, for good and valuable consideration, the receipt and sufficiency of which is hereby agreed upon by Assignor and Assignee, does here by assign to Bryan Anthony Reo [personally and individually], Assignee, all his interest, right, title, and ownership in a judgment entered in United States District Court for the Northern District of Ohio, on June 23, 2021 [6/23/2021], signed by the honorable judge John R. Adams in docket ECF No. 52 in the amount of \$250,000.00 dollars in compensatory damages and \$250,000.00 dollars in punitive damages for an amount in the aggregate of \$500,000.00 dollars. As of the date of this assignment the total value of the judgment is \$500,000.00 dollars inclusive of all post judgment interest, costs, fees, and other awards. At the time of this assignment, the judgment remains unsatisfied as to Judgment Debtor, and this judgment remains in full force and effect.

The Name and address of Assignee is:

Bryan Reo

P.O. Box 5100, Mentor, Ohio 44061 (Assignee)

ASSIGNOR:

ANTHONY DOMENIC REO

By: Anthony Domenic Reo
Anthony Domenic Reo,
Plaintiff/Assignor

SWORN TO AND SUBSCRIBED, before me, this 28 day of June, 2021.



ELIZA ADAMS
Notary Public
State of Ohio
My Comm. Expires
April 26, 2025

Eliza Adams
Notary Public
Print Name: Eliza Adams
Commission Expires: 4/26/2025

Respectfully submitted,

REO LAW, LLC

/s/ Bryan A. Reo
Bryan A. Reo, Esq.
P.O. Box 5100
Mentor, OH 44061
(Business): (216) 505-0811
(Mobile): (440) 313-5893
(Email): reo@reolaw.org
Ohio Law License - #0097470
Attorney for Plaintiff Anthony Domenic Reo

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above was electronically filed with the Court, and a copy was sent via First Class Mail to the following this 28th day of June, 2021:

Martin Lindstedt
338 Rabbit Track Road
Granby, Missouri 64844
P: 417-472-6901

/s/ Bryan A. Reo
Bryan A. Reo, Esq.
P.O. Box 5100
Mentor, OH 44061
(Business): (216) 505-0811
(Mobile): (440) 313-5893
(Email): reo@reolaw.org
Ohio Law License - #0097470

I hereby certify that this instrument is a true and correct copy of the original on file in my office.
Attest: Sandy Opacich, Clerk
U.S. District Court
Northern District of Ohio

By: _____
Deputy Clerk

Plaintiff Anthony Domenic Reo that the Court determined to be defamatory or false light. Defendant is enjoined and prohibited from further publishing any statements that Plaintiff had incestuous sexual relations with his own son or an illicit extramarital affair with his daughter-in-law. Defendant shall, upon receipt of this order, immediately remove all statements from any website medium under his control and shall not republish any statements or any substantially similar statements.

IT IS SO ORDERED. This matter is hereby closed.

June 23, 2021

/s/ Judge John R. Adams
JUDGE JOHN R. ADAMS
UNITED STATES DISTRICT COURT

I hereby certify that this instrument is a true and correct copy of the original on file in my office.
Attest: Sandy Opacich, Clerk
U.S. District Court
Northern District of Ohio

By: _____
Deputy Clerk

STATE OF SOUTH DAKOTA
CIRCUIT COURT, STANLEY CO.
FILED

JUL 06 2021

Brooke Cronin Clerk
By *[Signature]* Deputy

THE UNITED STATES DISTRICT COURT
NORTHER DISTRICT OF OHIO
EASTERN DIVISION

Anthony Domenic Reo,)	CASE NO.: 1:19CV2615
)	
Plaintiff,)	JUDGE JOHN ADAMS
)	
v.)	
)	
Martin Lindstedt,)	
)	
)	<u>JUDGMENT ENTRY</u>
)	
)	
Defendant.)	

In accordance with the Opinion and Order of April 18, 2021 (ECF No. 43) granting summary judgment to Plaintiff, judgment is rendered for Plaintiff Anthony Domenic Reo as follows:

1. Judgment is hereby entered in favor of Plaintiff Anthony Domenic Reo against Defendant Martin Lindstedt in the amount of \$250,000.00 dollars in compensatory damages with an additional \$250,000.00 dollars in punitive damages for a total amount of \$500,000.00 dollars in the aggregate as to Count I (Defamation) and Count II (Invasion of Privacy/False Light).

2. A permanent injunction is hereby granted enjoining and prohibiting Defendant Martin Lindstedt as to publication of all statements that Defendant published about

SA- DEBINA
J.

NO 02 2051

FILED
CIVIL COURT
STATE OF

Plaintiff Anthony Domenic Reo that the Court determined to be defamatory or false light. Defendant is enjoined and prohibited from further publishing any statements that Plaintiff had incestuous sexual relations with his own son or an illicit extramarital affair with his daughter-in-law. Defendant shall, upon receipt of this order, immediately remove all statements from any website medium under his control and shall not republish any statements or any substantially similar statements.

IT IS SO ORDERED. This matter is hereby closed.

June 23, 2021

/s/ Judge John R. Adams
JUDGE JOHN R. ADAMS
UNITED STATES DISTRICT COURT

I hereby certify that this instrument is a true and correct copy of the original on file in my office.
Attest: Sandy Opacich, Clerk
U.S. District Court
Northern District of Ohio

By: _____
Deputy Clerk

FILED

STATE OF SOUTH DAKOTA

JUL 06 2021

IN CIRCUIT COURT

COUNTY OF STANLEY

By Brooke Cronin Clerk
Deputy

SIXTH JUDICIAL CIRCUIT

BRYAN ANTHONY REO

Creditor

vs.

MARTIN LINDSTEDT

Debtor

NOTICE OF FILING FOREIGN JUDGMENT

FILE NO. 58CIV21-000024

To: MARTIN LINDSTEDT
338 RABBIT TRACK RD
GRANBY, MO 64844

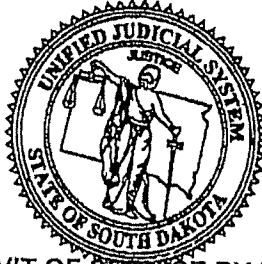
You are hereby notified that a foreign judgment in the above-captioned matter having originally been entered in the United States District Court, Northern District of Ohio, Eastern Division of the County of Cuyahoga, State of Ohio, has been filed against you in the Circuit Court of Stanley County, South Dakota, on the 2nd day of July, 2021.

The name of the judgment creditor is BRYAN ANTHONY REO

The name and address of the judgment creditor's attorney in South Dakota is:
Robert Konrad, Attorney
1110 E Sioux Ave,
Pierre SD 57501

Dated this 6th day of July, 2021.

/s/ Julie Kilian, Clerk of Court
by JSGE10201, (Deputy) Clerk of Court



AFFIDAVIT OF SERVICE BY MAIL

I, Julie Kilian, Clerk of Court in Stanley County, State of South Dakota, being sworn, state that a copy of the above Notice of Filing Foreign Judgment was mailed to BRYAN ANTHONY REO, the creditor, at BRYAN ANTHONY REO 7724 TEA ROSE DRIVE PO BOX 5100 MENTOR, OH 44061; , and to MARTIN LINDSTEDT, the debtor, at MARTIN LINDSTEDT 338 RABBIT TRACK RD GRANBY, MO 64844; on the 6th day of July, 2021 by first class mail by depositing said Notice, with sufficient postage prepaid, in the United States Mail at the Post Office of the City of Ft. Pierre, South Dakota.

/s/ Julie Kilian, Clerk of Court
by JSGE10201, (Deputy) Clerk of Court

Signed and sworn to before me on this 6th day of July, 2021.



UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

EXHIBIT

D

Bryan Anthony Reo, Pro Se

Plaintiff

v.

Case No: 1:19-cv-02103

Martin Lindstedt, Pro Se

Defendant / appellee

MOTION FOR PAUPER STATUS

I move to waive the payment of the appellate filing fee under Fed. R. App. P. 24 because I am a pauper. This motion is supported by the attached financial affidavit.

The issues which I wish to raise on appeal are: *in below box*

Bryan Reo, longtime non-white antifa activist pretending to be a white supremacist, sued Pastor Martin Lindstedt and his Aryan Nations church over 20 times since 2014, but won a judgment in the Lake County Ohio courts, so Pastor Lindstedt foolishly removed this one of four to the federal courts. After a racist answer & counterclaims duly amended, Judge Solomon summarily ruled in favor of Plaintiff for liability but reserved damages for jury trial even though Reo never made any FRCP Rule 26 computation of damages because there were none. After judges in the other 3 cases did away with Amendment 7 jury trial and 8th Amendment "excessive fines" Judge Oliver socked Lindstedt with \$1 million in unproven damages. Also Oliver has assessed a "gag order" further violating 1st Amendment. Pastor Lindstedt also disputes that any Ohio court has or ever had jurisdiction to drag Pastor Lindstedt and Lindstedt's Aryan Nations Church 900 miles from Missouri to face jury or judge summary trial. Wherefore Pastor Lindstedt

Signed: *Martin Lindstedt* Date: 9 July 2021

appears if p

Address: 338 Rabbit Track Road *Posta ETCC (AX) P*

Granby Missouri 64844

AFFIDAVIT ACCOMPANYING MOTION FOR PERMISSION TO APPEAL IN FORMA PAUPERIS

United States Court of Appeals
for the Sixth Circuit

Bryan Anthony Reo, Pro Se]
Plaintiff]

v.]

Martin Lindstedt, Pro Se]
Defendant / Appellant]

Case No: 1:19-cv-02103

Affidavit in Support of Motion

Instructions

I swear or affirm under penalty of perjury that, because of my poverty, I cannot prepay the docket fees of my appeal or post a bond for them. I believe I am entitled to redress. I swear or affirm under penalty of perjury under United States laws that my answers on this form are true and correct. (28 U.S.C. §§ 1746; 18 U.S.C. §§ 1621.)

Complete all questions in this application and then sign it. Do not leave any blanks: if the answer to a question is "0," "none," or "not applicable (N/A)," write that response. If you need more space to answer a question or to explain your answer, attach a separate sheet of paper identified with your name, your case's docket number, and the question number.

Signed: Pastor Martin LindstedtDate: 9 July 2021

Church of Jesus Christ of Latter-day Saints
My issues on appeal are: Aryan Nations of Missouri!

Bryan Reo, longtime non-white antifa activist pretending to be a white supremacist, sued Pastor Martin Lindstedt and his Aryan Nations church over 20 times since 2014, but won a judgment in the Lake County Ohio courts, so Pastor Lindstedt foolishly removed this one of four to the federal courts. After a racist answer & counterclaims duly amended, Judge Solomon summarily ruled in favor of Plaintiff for liability but reserved damages for jury trial even though Reo never made any FRCP Rule 26 computation of damages because there were none. After judges in the other 3 cases did away with Amendment 7 jury trial and 8th Amendment "excessive fines" Judge Oliver socked Lindstedt with \$1 million in unproven damages. Also Oliver has assessed a "gag order" further violating 1st Amendment. Pastor Lindstedt also disputes that any Ohio court has or ever had jurisdiction to drag Pastor Lindstedt and Lindstedt's Aryan Nations Church 900 miles from Missouri to face jury or judge summary trial. Wherefore Pastor Lindstedt appeals in forma pauperis.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	Average monthly amount during the past 12 months		Amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ 0.00	\$ 0.00	6.00	NA
Self-employment	0.00	A	1	
Income from real property (such as rental income)	↑	↑	1	
Interest and dividends				
Gifts				
Alimony				
Child support		NA		
Retirement (such as social security, pensions, annuities, insurance)				
Disability (such as social security, insurance payments)				
Unemployment payments	↓			
Public-assistance (such as welfare)	0.00			
Other (specify): <u>ROXIE'S money</u>	\$ 500.00	↓	↓	↓
Total monthly income: <u>\$6000 left</u>	\$ 500.00	\$ 0.00	\$ 0.00	\$ 0.00

Pastor Lundstedt
Aug 2020

2. List your employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
Church of Jesus Christ Christian /	338 Rabbit Track Road, Granby	Oct. 2006 to now	\$ 0.00
Aryan Nations of Missouri	Missouri 64844		Unpaid only Chief Pastor

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross Monthly Pay
Roxie Fansworth	HT, died 4 Aug 2020		
used to get	\$1200/month VA check		
now dead so	no check		

4. How much cash do you and your spouse have? \$ 1,500

Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Financial Institution	Type of Account	Amount You Have	Amount Your Spouse Has
Community Bank & Trust, Granby	checking / debit	\$ 100.00	

If you are a prisoner seeking to appeal a judgment in a civil action or proceeding, you must attach a statement certified by the appropriate institutional officer showing all receipts, expenditures, and balances during the last six months in your institutional accounts. If you have multiple accounts, perhaps because you have been in multiple institutions, attach one certified statement of each account.

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

Home (Value)	Other real estate (Value)	Motor Vehicle #1 (Value)
137 Hillcrest Granby	338 Rabbit Track Road	Make & year: 2005 Chev \$1000
paid \$14000 worth \$25000	Granby paid \$3000 1987	Model: Venture Van
	unlivable today	Registration #: CU7-6JB
Motor Vehicle #2 (Value)	Other assets (Value)	Other assets (Value)
Make & year: 2011 Chev \$500	none to speak of	
Model: HHR Mini-SUV		
Registration #: TE1-H2F		

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
No one		
N/A		

7. State the persons who rely on you or your spouse for support.

Name	Relationship	Age
None		
N/A		

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate.

	You	Your Spouse
Rent or home-mortgage payment (including lot rented for mobile home)		A
Are real estate taxes included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 300.00	
Home maintenance (repairs and upkeep)		
Food	\$ 150.00	
Clothing		
Laundry and dry-cleaning		
Medical and dental expenses		
Transportation (not including motor vehicle expenses)		
Recreation, entertainment, newspapers, magazines, etc.		
Insurance (not deducted from wages or included in mortgage payments) Homeowner's or renter's		
Life		
Health		
Motor vehicle	\$ 100.00	
Other:		NA
Taxes (not deducted from wages or included in mortgage payments) specify: <input type="text"/>		
Installment payments		
Motor Vehicle		
Credit card (name): <input type="text"/>		
Department store (name): <input type="text"/>		
Other:	\$ 50.00	
Alimony, maintenance, and support paid to others		
Regular expenses for operation of business, profession, or farm (attach detail)		
Other (specify): <input type="text"/>		
Total monthly expenses:	\$ 600.00	\$ 0.00

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

☐ Yes ☒ No If yes, describe on an attached sheet.

10. Have you spent or will you be spending any money for expenses or attorney fees in connection with this lawsuit?

☒ Yes ☐ No If yes, how much? \$ 50.00

11. Provide any other information that will help explain why you cannot pay the docket fees for your appeal.

Simply put this incessant Bryan Reo "lawfare" has bankrupted Pastor Lindstedt and Pastor Lindstedt's Aryan Nations Church to where Pastor Lindstedt has had to rely upon begging for donations and using the \$6000 from his deceased domestic partner Roxie Fausnaught left him after she died 4 August 2020. Every so often someone will send anonymous money orders and cash in the mail -- Pastor Lindstedt has gotten \$250 worth the past year.

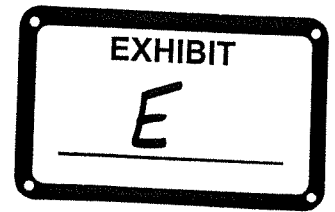
12. State the address of your legal residence.

338 Rabbit Track Road Granby is the official and voting address but it is uninhabitable since 2014. Up the hill 75 yards is Roxie's mother's old house purchased for \$14000 to keep in the Lamp family in 2012 which has extensive termite damage and mold but is livable. Pastor Lindstedt doesn't want his professional antifa stalker Bryan Reo to know the address

Your daytime phone number: (417) 472-6901

Your age: 63

Your years of schooling: 16 years



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

BRYAN ANTHONY REO,)	CASE NO.1:19CV2589
)	
Plaintiff,)	SENIOR JUDGE
)	CHRISTOPHER A. BOYKO
)	
Vs.)	
)	
MARTIN LINDSTEDT,)	<u>OPINION AND ORDER</u>
)	
Defendant.)	

CHRISTOPHER A. BOYKO, SR. J:

This matter is before the Court upon Plaintiff Bryan Anthony Reo's Motion for Summary Judgment. (ECF# 49). The Magistrate Judge issued his Report and Recommendation on December 1, 2020, recommending the Court grant summary judgment for Plaintiff on the liability portion of his Complaint at Counts I and II; deny summary judgment for Plaintiff on damages for Counts I and II and deny summary judgment for Plaintiff on Count III of his Complaint, or alternatively, grant summary judgment for Plaintiff on Counts I and II and on his damages claims. For the following reasons, the Court adopts the Magistrate Judge's recommendation and grants summary judgment for Plaintiff on Counts I and II of his Complaint on liability and on damages in the amount of \$250,000 in compensatory damages and \$500,000 in punitive damages.

Plaintiff is a Lake County, Ohio resident and is married to Stefani Reo. Defendant

Martin Lindstedt is a resident of Missouri and is Pastor of the Church of Jesus Christ Christian/Aryan Nations of Missouri. Plaintiff previously sued Defendant and his church in the Lake County Court of Common Pleas for Libel and False Light. Plaintiff obtained a jury award against Lindstedt for \$105,000. That case is presently on appeal.

The present suit alleges Defendant made several defamatory statements against Plaintiff following the Lake County suit, including: that Plaintiff engaged in an extramarital affair; Plaintiff engaged in a sex act with a judge in order to obtain a favorable court ruling; and that Plaintiff engaged in an incestuous relationship with his own father. The Reos have filed multiple suits against Lindstedt in Lake County court. Defendant removed these suits to federal district court on diversity and federal question jurisdiction.

Plaintiff's Complaint alleges four claims: Defamation (Count I), Invasion of Privacy /False Light (Count II), Intentional Infliction of Emotional Distress (Count III) and Permanent Injunctive Relief (Count IV).¹

The Magistrate Judge recommends summary judgment for Plaintiff on Counts I and II of his Complaint because Defendant failed to timely respond to Requests for Admission propounded to him on May 15, 2020. By rule, Defendant was to respond to the Requests by June 15, 2020. Defendant failed to respond until November 9, 2020, when he filed his Opposition to Summary Judgment and disclaimed any "silent admissions." Defendant's failures appear to stem largely from his pro se status which the Magistrate Judge has repeatedly cautioned him against. Defendant continues to represent himself and submits filings filed with

¹ Subsequent to the Magistrate Judge's Report and Recommendation, Plaintiff moved to dismiss Counts III and IV of his Complaint which the Court granted. Therefore, the Court finds the Magistrate Judge's recommendation on these claims moot.

racial and sex-based slurs and insults largely directed at the Plaintiff.

Relying on Fed R. Civ. P 36, the Magistrate Judge recommends that the Court grant summary judgment for Plaintiff on Counts I and II of his Complaint as to liability only. The Magistrate Judge examined the elements of Defamation and False Light claims in light of the express Requests for Admissions propounded to Defendant by Plaintiff and found that they satisfied all the elements. These admissions include the following:

REQUEST FOR ADMISSION NO. 3: Please admit that at all times relevant to the controversy described within Plaintiff's Complaint, Defendant purposefully acted in a tortious manner so as to cause Plaintiff to suffer damages in the State of Ohio.

REQUEST FOR ADMISSION NO. 4: Please admit that on August 9, 2019, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had engaged in homosexual oral sex with Missouri State trial court Judge Gregory Stremel for the purpose of obtaining a favorable ruling in a litigation matter against Defendant.

REQUEST FOR ADMISSION NO. 22: Please admit that Defendant is liable to Plaintiff for invasion of privacy—false light—for the reasons articulated in Paragraphs 45 through 51 of Plaintiff's Complaint.

REQUEST FOR ADMISSION NO. 29: Please admit that for purposes of First Amendment jurisprudence, Plaintiff is a non-public figure.

REQUEST FOR ADMISSION NO. 30: Please admit that for the reasons set forth within Plaintiff's Complaint, Plaintiff suffered \$250,000.00 in general damages due to Defendant's tortious conduct.

REQUEST FOR ADMISSION NO. 31: Please admit that for the reasons set forth within Plaintiff's Complaint, [] it would be just and proper for Plaintiff to be awarded \$500,000.00 in punitive damages against Defendant's willful and malicious conduct.

The Magistrate Judge further found that Defendant had never moved to withdraw his admissions such that the Court could disregard them and proceed to analyze the claims strictly on the merits. Moreover, the Magistrate Judge cites to Sixth Circuit precedent holding that sua

sponte withdrawal of admissions would contravene the purposes of Rule 36. Consequently, the Magistrate Judge recommends summary judgment be granted for Plaintiff on liability on his Defamation and False Light claims. The Magistrate Judge further recommends that withdrawing the admissions now would be prejudicial to Plaintiff since Defendant continues to file insulting and degrading responses that would only continue to inflame Plaintiff and needlessly prolong the litigation. However, the Magistrate Judge recommends denying summary judgment for Plaintiff on the damages portion of his Defamation and False Light claim, as these are matters within the purview of the jury and Plaintiff has provided little evidence of damages in his filings. As a result, the Magistrate Judge recommends that the Court exercise its discretion and permit Defendant to withdraw his admissions on damages.

In the alternative, the Magistrate Judge recommends summary judgment for Plaintiff on his Defamation and False Light claims on both liability and damages given that the admissions would satisfy all the elements of his Defamation and False Light claims, including the amount of damages suffered by Plaintiff.

Defendant's Objections

Though difficult to decipher due to the stream of vitriol spewed by Defendant throughout his filings, a few points are made clear in his Objections. First, he asserts that he has repeatedly denied the admissions the Magistrate Judge recommends be deemed admitted and which provide the basis for his recommendation that Defendant be found liable on Counts I and II of Plaintiff's Complaint. Defendant alleges he overtly requested the Court withdraw the admissions in his November 9, 2020 filing. Lastly, he objects to "everything" in the Magistrate Judge's Report and Recommendation.

Plaintiff's Objections

Plaintiff offers only a limited Objection to the Magistrate Judge's Report and Recommendation, objecting to the recommendation that his damages be denied on summary judgment. According to Plaintiff, Defendant's failure to respond to the Request for Admissions means they are deemed admitted by operation of law. These deemed admissions include admissions that Plaintiff was injured by Defendant's alleged defamatory and false light statements and that the amount of his damages equals \$250,000 in compensatory damages and \$500,000 in punitive damages. These admissions are as follows:

REQUEST FOR ADMISSION NO. 30: Please admit that for the reasons set forth within Plaintiff's Complaint, Plaintiff suffered \$250,000.00 in general damages due to Defendant's tortious conduct.

REQUEST FOR ADMISSION NO. 31: Please admit that for the reasons set forth within Plaintiff's Complaint, [] it would be just and proper for Plaintiff to be awarded \$500,000.00 in punitive damages against Defendant due to Defendant's willful and malicious misconduct.

Consequently, the above admissions conclusively demonstrate Plaintiff's damages such that further proof is unnecessary. Also, allowing some admissions to be withdrawn while enforcing others, when Defendant has not moved to withdraw them, amounts to a sua sponte withdrawal which the law prohibits.

Plaintiff also objects to permitting Defendant to withdraw his admissions, contending it would prejudice his case because Defendant continues to insult and demean the Reos in his filings with the Court. In addition, his case would further be prejudiced because Defendant has refused to provide any discovery in the case. Moreover, when Plaintiff attempted to obtain expert witnesses to testify on his psychological damages he was refused for fear of Defendant. Thus, should the Court permit withdrawal of his admissions it would only needlessly prolong the

litigation and continue to provide Defendant a public forum to further demean and degrade Plaintiff.

LAW AND ANALYSIS

Standard of Review

Pursuant to Fed. R. Civ. P. 72(b) and 28 U.S.C. § 636(b)(1)(c), the District Court shall review *de novo* any finding or recommendation of the Magistrate's Report and Recommendation to which specific objection is made. A party who fails to file an objection waives the right to appeal. *U.S. v. Walters*, 638 F.2d 947, 950 (6th Cir. 1981). In *Thomas v. Arn*, 474 U.S. 140, 150 (1985), the Supreme Court held: "[i]t does not appear that Congress intended to require district court review of a magistrate judge's factual or legal conclusions, under a *de novo* or any other standard, when neither party objects to those findings."

Local Rule 72.3(b) recites in pertinent part:

The District Judge to whom the case was assigned shall make a *de novo* determination of those portions of the report or specified proposed findings or recommendations to which objection is made and may accept, reject, or modify, in whole or in part, the findings or recommendations made by the Magistrate Judge.

Put another way, 28 U.S.C. § 636(b) and Local Rule 72.3 authorize the District Court Judge to address objections by conducting a *de novo* review of relevant evidence in the record before the Magistrate Judge. Parties are not permitted at the district court stage to raise new arguments or issues that were not presented to the magistrate. *Murr v. United States*, 200 F.3d 895, 902 n.1 (6th Cir. 2000), citing *United States v. Waters*, 158 F.3d 933 (6th Cir. 1998).

Requests for Admission

Pursuant to Fed R. Civ. P. 36(a)(3), a failure to timely respond to a Request for

Admission is deemed an admission as the Rule reads:

A matter is admitted unless, within 30 days after being served, the party to whom the request is directed serves on the requesting party a written answer or objection addressed to the matter and signed by the party or its attorney.

However, a party against whom unresponded-to admissions are deemed admitted may move to withdraw the admission pursuant to Rule 36(b) which reads:

Effect of an Admission; Withdrawing or Amending.

A matter admitted under this rule is conclusively established unless the court, on motion, permits the admission to be withdrawn or amended. Subject to Rule 16(e), the court may permit withdrawal or amendment if it would promote the presentation of the merits of the action and if the court is not persuaded that it would prejudice the requesting party in maintaining or defending the action on the merits. An admission under this rule is not an admission for any other purpose and cannot be used against the party in any other proceeding.

While the plain language of Rule 36(b) requires that a request to withdraw or amend admissions be “on motion,” the Sixth Circuit has held that a formal, written motion is not required. See *Kerry Steel, Inc. v. Paragon Indus., Inc.*, 106 F.3d 147, 153–54 (6th Cir. 1997), (“although the defendant did not file a formal motion to withdraw, the defendant’s attorney did argue at the hearing on the motion to dismiss that the plaintiff’s requests for admission should not be deemed admitted...we are reluctant to assign talismanic significance to the attorney’s failure to use the phrase “I move.”). See also *United States v. Petroff-Kline*, 557 F.3d 285, 293–94 (6th Cir. 2009) (“the failure to respond in a timely fashion does not require the court automatically to deem all matters admitted.”). “[W]e have held that a formal motion is not always required. (Internal citation omitted). Instead, a withdrawal ‘may be imputed from a party’s actions,’ including the filing of a belated denial.” *Id.* Quoting *Chancellor v. City of Detroit*, 454 F. Supp. 2d 645, 666 (E.D. Mich.2006).

District courts have “considerable discretion” regarding whether to permit withdrawal or amendment under Rule 36(b), *Kerry Steel*, 106 F.3d at 154. The court's discretion must be exercised in light of Rule 36(b), which permits withdrawal (1) “when the presentation of the merits of the action will be subverted thereby,” and (2) “when the party who obtained the admission fails to satisfy the court that withdrawal or amendment will prejudice that party in maintaining the action or defense on the merits.” However, there must first be a motion upon which the Court may consider withdrawal as it is not permitted to act sua sponte. In regard to prejudice, “[t]he prejudice contemplated by [Rule 36(b)] is not simply that the party who initially obtained the admission will now have to convince the fact finder of its truth.” *Brook Village North Assoc. v. General Elec. Co.*, 686 F.2d 66, 70 (1st Cir.1982). Prejudice under Rule 36(b), rather, “relates to special difficulties a party may face caused by a sudden need to obtain evidence upon withdrawal or amendment of an admission.” *Kerry Steel*, 106 F.3d at 154.

A number of courts within this circuit have held that requests for admission which are deemed admitted by the default of a pro se litigant generally “cannot be the sole basis for granting summary judgment if Plaintiff was not warned in the requests for admissions of the consequence of failing to respond timely.” *Gordon v. Jones*, No. 3:08CV-P460-S, 2011 WL 847926, at *6, 2011 U.S. Dist. LEXIS 23320, at *14 (W.D. Ky. Mar. 8, 2011) (citing *Harris v. Callwood*, 844 F.2d 1254, 1256 (6th Cir. 1988)); see also *Gilliam v. Ordiway*, No. 15-cv-11833, 2016 WL 6803135, at *1, 2016 U.S. Dist. LEXIS 157801, at *8 (E.D. Mich. Oct. 20, 2016); *Morris v. Christian Cty. Sheriff's Dept.*, No. 5:12-CV-00156-TBR, 2013 WL 5934151, at *5, 2013 U.S. Dist. LEXIS 158240, at *5 (W.D. Ky. Nov. 5, 2013); *Jones-Bey v. Conrad*, No. 3:16-CV-723-DJH, 2020 WL 2736436, at *4 (W.D. Ky. May 26, 2020).

There was no warning given to Defendant in the Requests for Admission propounded on him by Plaintiff. However, from his filings, Defendant appears familiar with the consequences of failing to timely respond to such requests. (See ECF # 27 at 5). (In the Lake County litigation, Plaintiff alleged Defendant's admissions proved his case. The Lake County Court allowed Defendant to rescind his admissions on the eve of trial due to Plaintiff's own discovery failures.) Furthermore, Plaintiff's summary judgment motion requests the use of such admissions as the primary basis for judgment; and the Magistrate Judge gave Defendant additional time for discovery to respond to the summary judgment, presumably including an opportunity to move to withdraw his admissions. Defendant never formally or informally moved to withdraw, instead he appears to have unilaterally "withdrawn" his admissions without leave of court. Nor has Defendant submitted his responses to the Requests for Admissions to Plaintiff in the form and manner described in the Rule, if at all. Thus, this is not the case of a party inadvertently missing the deadline to submit responses or not fully understanding the ramifications of missing the response time due to his pro se status.

The Sixth Circuit has held, "the lenient treatment generally accorded to pro se litigants has limits." *Pilgrim v. Littlefield*, 92 F.3d 413, 416 (6th Cir. 1996). Moreover, "pro se parties must follow the same rules of procedure that govern other litigants." *Barry Wilson v. Middle Tennessee State Univ. & The State of Tennessee*, No. 3:19-0798, 2021 WL 694181, at *5 (M.D. Tenn. Feb. 23, 2021); see also *Fields v. County of Lapeera*, 2000 WL 1720727 at *2 (6th Cir. Nov. 8, 2000). "Ordinary civil litigants that proceed pro se are not entitled to special treatment, including assistance with responding to dispositive motions." *Wilson* at *5, citing *Brock v. Hendershott*, 840 F.2d 339, 343 (6th Cir.1988). The Sixth Circuit has further held: "[W]hile pro

se litigants may be entitled to some latitude when dealing with sophisticated legal issues, acknowledging their lack of formal training, there is no cause for extending this margin to straightforward procedural requirements that a layperson can comprehend as easily as a lawyer.” *Jourdan v. Jabe*, 951 F.2d 108, 109 (6th Cir. 1991). “Pro se litigants are not to be accorded any special consideration when they fail to adhere to readily-comprehended court deadlines.” *Id.* at 110.

Plaintiff filed his summary judgment motion on July 23, 2020, based on Defendant’s admissions. In a Declaration in Response to Motion for Summary Judgment, Asking for Discovery to be Extended to Cover All Parties Once Established (ECF # 58), Defendant requested an extension of discovery due to the sheer number of suits the Reos have filed against him and the passing of his domestic partner in August 2020. Defendant asked in his Declaration at ECF # 58 that discovery be extended because Plaintiff has refused to provide any discovery on his damages. Defendant further represented he will “answer” Plaintiff’s discovery requests including his Requests for Admissions on Defendant’s Church website.

In response to Defendant’s Declaration, the Magistrate Judge held a telephone status conference with the parties in September 2020. The Magistrate Judge granted Defendant’s Motion to Extend Discovery, ordering Defendant to file his Opposition to Plaintiff’s summary judgment motion by November 9, 2020 and permitting the parties to engage in further discovery, up to the response date, necessary to oppose or reply to the pending dispositive motion.

On November 9, 2020, Defendant filed his Consolidated Opposition Reply Brief to Plaintiff’s Motion for Summary Judgment. In the caption it further states, “Withdrawal of Silent ‘Admissions.’” In his Opposition Brief, Defendant states he is submitting all his consolidated

answers to Plaintiff and is “withdrawing all silent admissions yet again.” (Consolidated Brief in Opposition at 3). He continues: “Thus, since the admissions are withdrawn, then this Court can proceed to trial on the merits before a jury...” (*Id* at 3-4). Defendant later asserts, “since the admissions have been withdrawn in the time frame of further discovery set by Magistrate Parker on September 8, 2020,” the Reos have “no claim to summary judgment...” (*Id* at 5). Defendant also continues to assert that Plaintiff has failed to provide any basis for his damages. In his Objections at ECF# 83 to the Magistrate Judge’s R & R, Defendant claims that he has “overtly asked to withdraw the implied Rule 36 admissions” in his filing of November 9, 2020.

The Magistrate Judge determined that Defendant never moved to have his admissions withdrawn prior to the Report and Recommendation and the Court agrees. Instead, Defendant unilaterally withdrew his admissions because he did not want them used against him. However, he never provided direct answers to the Requests for Admission in the form required by Rule 36; and, insofar as this Court is aware, has still not done so, despite knowing that failure to do so may subject him to summary judgment.

The Court does not believe that Rule 36 or subsequent caselaw interpreting the same allows the Court to pick and choose which admissions will be withdrawn and which will be enforced when Defendant has not moved to withdraw any admissions. Because Defendant has not requested that only certain admissions be withdrawn, the Court must either withdraw all his admissions or none of them. The plain language of Rule 36 requires the withdrawal be “on motion” and, as the Magistrate Judge correctly determined, the Court may not withdraw admissions sua sponte. Defendant’s filings make clear he wants all his admissions withdrawn but he has never formally moved to do so and has never submitted his responses to the Requests.

Rule 36 is “intended to facilitate proof at trials by obviating the need to adduce testimony or documents as to matters that are really not in controversy. Thus, Fed. R. Civ. P. 36(a)(1)(A) permits requests for admissions as to ‘facts, the application of law to fact, or opinions about either.’” *Petroff-Kline*, 557 F.3d at 293, quoting Rule 36.

On consideration of Defendant’s and Plaintiff’s Objections, the Court agrees with the Magistrate Judge’s recommendation finding that Defendant admitted the requests for admission and that these support the elements of Defamation and False Light. The Court will not construe the statement in his Objection that he overtly asked the Magistrate to withdraw his requests as a request for withdrawal because the docket demonstrates Lindstedt never moved to withdraw, despite knowing the consequences for failure to do so, and because Lindstedt has not provided responses even more than eight months after they were propounded on him.

Rule 36(b) also requires that the Court consider what prejudice, if any, Plaintiff will face should the Court grant withdrawal. Again, the prejudice the Court must guard against is that which “relates to special difficulties a party may face caused by a sudden need to obtain evidence upon withdrawal or amendment of an admission.” *Kerry Steel*, 106 F.3d at 154. The Magistrate Judge found Plaintiff would be prejudiced by the continued scandalous and insulting filings of Defendant and by the needless prolonging of the litigation. In his Objection, Plaintiff argues against withdrawal, contending that not only would he suffer the prejudice described by the Magistrate Judge, but would also have to present his claims in the absence of any discovery from Defendant, who failed to provide him discovery as requested and continues to submit slanderous filings at every opportunity. Moreover, Plaintiff asserts that expert witnesses have declined to testify on his behalf for fear of Defendant.

The Court finds that much of the purported prejudice Plaintiff complains of is not the sort that would militate against withdrawal. Continued slanderous filings by Defendant do not relate to the special difficulties Plaintiff will face with the sudden need to obtain evidence. However, the fact that Defendant failed to provide evidence during discovery and has issued many threatening responses in his Court filings is particularly troubling to the Court and has clearly prejudiced Plaintiff's ability to marshal evidence in his case.

Based upon Defendant's continued scandalous, scurrilous and vitriol-laced filings, the Court will not show him the leniency usually afforded pro se litigants. Holding him to the standards of practice required of counsel, the Court will not tolerate Defendant's language in his filings and his misuse of the judicial process. Nor will the Court search the record to find that any of his filings constitute a request to withdraw the admissions.

By Rule, the admissions are deemed admitted and these admissions conclusively support Plaintiff's claims for Defamation and False Light as found by the Magistrate Judge. "Rule 36(a) allows a party to request an admission even where the request seeks admission of 'ultimate facts' or 'is dispositive of the entire case.'" *Turk v. Citimortgage*, No. 05-70386, 2005 WL 2090888, at *3 (E.D.Mich.2005) (citing *Campbell v. Spectrum Automation Co.*, 601 F.2d 246, 253 (6th Cir.1979)). "Thus matters deemed admitted can serve as a basis for the granting of a motion for summary judgment." *Id.* (citing Fed. R. Civ. P. 56(c); *First Nat'l Bank Co. of Clinton, Ill. v. Ins. Co. of N. Am.*, 606 F.2d 760, 766 (7th Cir.1979); *Dukes v. South Carolina Ins. Co.*, 770 F.2d 545, 548-49 (5th Cir.1985)). Rule 56 itself allows the use of admissions as a basis for granting summary judgment wherein it reads:

Supporting Factual Positions. A party asserting that a fact cannot be or is genuinely disputed must support the assertion by:

(A) citing to particular parts of materials in the record, including depositions, documents, electronically stored information, affidavits or declarations, stipulations (including those made for purposes of the motion only), admissions, interrogatory answers, or other materials.

See also *Jasar Recycling, Inc. v. Major Max Mgmt. Corp.*, No. 4:08CV2830, 2010 WL 395212, at *3 (N.D. Ohio Jan. 22, 2010) (holding that deemed admissions supported damage amounts claimed by plaintiff and granting summary judgment on the same.).

Therefore, because Defendant has not responded to Plaintiff's Requests for Admission, nor moved to withdraw them, the Court adopts the Magistrate Judge's recommendation that they be deemed admitted; and that these deemed admissions demonstrate there are no genuine issues of fact and Plaintiff is entitled to summary judgment on his Defamation and False Light claims against Defendant. Moreover, the Court adopts the Magistrate Judge's recommendation in the alternative that Plaintiff be granted summary judgment on these claims in the amount of \$250,000 in compensatory damages and \$500,000 in punitive damages against Defendant based on the same admissions.

The case shall proceed on Defendant's remaining claims.

IT IS SO ORDERED.

DATE: March 29, 2021

s/Christopher A. Boyko
CHRISTOPHER A. BOYKO
Senior United States District Judge

STEFANI ROSSI REO,)	CASE NO.1:19CV2786
)	
Plaintiff,)	SENIOR JUDGE
)	CHRISTOPHER A. BOYKO
)	
Vs.)	
)	
MARTIN LINDSTEDT,)	<u>OPINION AND ORDER</u>
)	
Defendant.)	

This matter is before the Court upon Plaintiff Stefani Rossi Reo's ("Reo") Motion for Summary Judgment. (ECF# 26). The Magistrate Judge issued his Report and Recommendation on December 1, 2020, recommending the Court grant summary judgment for Reo on the liability portion of her Complaint at Counts I and II; deny summary judgment for Reo on damages for Counts I and II and deny summary judgment for Reo on Count III of her Complaint, or alternatively, grant summary judgment for Reo on Counts I and II and on her damages claims. For the following reasons the Court adopts the Magistrate Judge's recommendation and grants summary judgment for Stefani Reo on Counts I and II of her Complaint and in the alternative, grants summary judgment for Stefani on damages in the amount of \$250,000 in compensatory damages and \$250,000 in punitive damages.

Plaintiff Stefani Reo is a Lake County, Ohio resident and is married to Bryan Reo.

Defendant Martin Lindstedt (“Lindstedt”) is a resident of Missouri and is Pastor of the Church of Jesus Christ Christian/Aryan Nations of Missouri. Bryan Reo previously sued Lindstedt and his church in Lake County Court of Common Pleas for Libel and False Light. Bryan obtained a jury award against Lindstedt for \$105,000. That case is presently on appeal.

The present suit alleges Lindstedt made several defamatory statements against Stefani after Bryan Reo’s Lake County suit, including: the Reos have difficulties in their marriage; Stefani is a transsexual prostitute; Bryan is a homosexual and Stefani is barren and cannot have children. The Reos have filed multiple suits against Lindstedt in Lake County court. Lindstedt removed these suits to federal district court on diversity and federal question jurisdiction.

Stefani’s Complaint alleges four claims: Defamation (Count I), Invasion of Privacy /False Light (Count II), Intentional Infliction of Emotional Distress (“IIED”) (Count III) and Permanent Injunctive Relief (Count IV).

The Magistrate Judge recommends summary judgment for Stefani on Counts I and II of her Complaint because Lindstedt failed to timely respond to Requests for Admission propounded to him on May 15, 2020. By rule, Lindstedt was to respond to the Requests by June 15, 2020. Lindstedt failed to respond until November 9, 2020, when he filed his Opposition to Summary Judgment and disclaimed any “silent admissions.” Lindstedt’s failures appear to stem largely from his pro se status which the Magistrate Judge has repeatedly cautioned him against. Lindstedt continues to represent himself and submits filings filled with racial and sex-based slurs and insults largely directed at the Reos.

Relying on Fed R. Civ. P 36, the Magistrate Judge recommends that the Court grant summary judgment for Stefani on Count I and II of her Complaint as to liability only. The

Magistrate Judge examined the elements of Defamation and False Light claims in light of the express Requests for Admissions propounded to Lindstedt by Stefani and found that they satisfied all the elements. These admissions are as follows:

REQUEST FOR ADMISSION NO. 5: Please admit that prostitution is a crime in Ohio.

REQUEST FOR ADMISSION NO. 8: Please admit that Plaintiff never engaged in prostitution.

REQUEST FOR ADMISSION NO. 11: Please admit that you possess no evidence to support the alleged truth of any of the allegedly defamatory statements that give rise to Plaintiff's complaint in the instant action.

REQUEST FOR ADMISSION NO. 15: Please admit that Defendant is liable to Plaintiff for defamation for the reasons articulated in Paragraphs 7 through 31 of Plaintiff's Complaint.

REQUEST FOR ADMISSION NO. 22: Please admit that for purposes of First Amendment jurisprudence, Plaintiff is a non-public figure.

REQUEST FOR ADMISSION NO. 23: Please admit that for the reasons set forth within Plaintiff's Complaint, Plaintiff suffered \$250,000.00 in general damages due to Defendant's tortious conduct.

REQUEST FOR ADMISSION NO. 24: Please admit that for the reasons set forth within Plaintiff's Complaint, it would be just and proper for Plaintiff to be awarded \$250,000.00 in punitive damages against Defendant due to Defendant's willful and malicious misconduct.

The Magistrate Judge further found that Lindstedt had never moved to withdraw his admissions such that the Court could disregard them and proceed to analyze the claims strictly on the merits. Moreover, the Magistrate Judge cites to Sixth Circuit precedent holding that sua sponte withdrawal of admissions would contravene the purposes of Rule 36. Consequently, the Magistrate Judge recommends summary judgment be granted for Stefani on liability on her Defamation and False Light claims. The Magistrate Judge further recommends that withdrawing the admissions now would be prejudicial to Stefani since Lindstedt continues to file insulting and degrading responses that would only continue to inflame the Reos and needlessly prolong the

litigation. However, the Magistrate Judge recommends denying summary judgment for Stefani on the damages portion of her Defamation and False Light claims as these are matters within the purview of the jury and Stefani has provided little evidence of damages in her filings. As a result, the Magistrate Judge recommends that the Court exercise its discretion and permit Lindstedt to withdraw his admissions on damages. Furthermore, the Magistrate Judge's recommendation is consistent with the ruling of the district court in similar litigation between the parties on similar claims. Lastly, the Magistrate Judge recommends denying summary judgment on Reo's Intentional Infliction of Emotional Distress and Permanent Injunction claims by again exercising its discretion in allowing Lindstedt to withdraw his admissions since it is difficult to maintain an IIED claim under Ohio law and any damages Stefani may obtain on her IIED claim would be subsumed in her Defamation and False Light claims. Because a Permanent Injunction is not a claim but a type of relief, the Court may consider awarding Stefani injunctive relief at the time it determines damages and Reo has adequate remedies at law that militate against the award of injunctive relief.

In the alternative, the Magistrate Judge recommends summary judgment for Reo on all her claims and damages given that the admissions would satisfy all the elements of her Defamation and False Light claims, including the amount of damages she suffered.

Lindstedt Objections

Though difficult to decipher due to the stream of vitriol spewed by Lindstedt throughout his filings, a few points are made clear in his Objections. First, he asserts he has repeatedly denied the admissions the Magistrate Judge recommends be deemed admitted and which provide the basis for the recommendation that Lindstedt be found liable on Counts I and II of Plaintiff's

Complaint. Lindstedt alleges he has overtly requested the Court withdraw the admissions in his November 9, 2020 filing. Lastly, he objects to “everything” in the Magistrate Judge’s Report and Recommendation.

Stefani’s Objections

Stefani offers only a limited Objection to the Magistrate Judge’s Report and Recommendation, objecting to the recommendation that her damages be denied on summary judgment. According to Stefani, Lindstedt’s failure to respond to the Request for Admissions means they are deemed admitted by operation of law. These deemed admissions include admissions that Stefani was injured by Lindstedt’s alleged defamatory and false light statements and that the amount of her damages equals \$250,000 in compensatory damages and \$250,000 in punitive damages. These admissions are as follows:

REQUEST FOR ADMISSION NO. 28: Please admit that you damaged Plaintiff in an amount of \$250,000 in general damages and \$250,000 in punitive damages.

REQUEST FOR ADMISSION NO. 29: Please admit that judgment should be entered against you, in favor of Plaintiff Stefani Rossi Reo, in the amount of \$500,000.00 dollars.

Consequently, the above admissions conclusively demonstrate Stefani’s damages such that further proof is unnecessary. Also, allowing some admissions to be withdrawn while enforcing others, when Lindstedt has not moved to withdraw, amounts to a sua sponte withdrawal which the law prohibits.

Stefani also objects to permitting Lindstedt to withdraw his admissions, contending it would prejudice her case because Lindstedt continues to insult and demean the Reos in his filings with the Court. In addition, her case would further be prejudiced because Lindstedt has refused to provide any discovery in the case. Moreover, when Stefani attempted to obtain expert

witnesses to testify on her psychological damages she was refused for fear of Lindstedt. Thus, should the Court permit withdrawal of his admissions it would only needlessly prolong the litigation and continue to provide Lindstedt a public forum to further demean and degrade Stefani.

LAW AND ANALYSIS

Standard of Review

Pursuant to Fed. R. Civ. P. 72(b) and 28 U.S.C. § 636(b)(1)(c), the District Court shall review *de novo* any finding or recommendation of the Magistrate’s Report and Recommendation to which specific objection is made. A party who fails to file an objection waives the right to appeal. *U.S. v. Walters*, 638 F.2d 947, 950 (6th Cir. 1981). In *Thomas v. Arn*, 474 U.S. 140, 150 (1985), the Supreme Court held: “[i]t does not appear that Congress intended to require district court review of a magistrate judge’s factual or legal conclusions, under a *de novo* or any other standard, when neither party objects to those findings.”

Local Rule 72.3(b) recites in pertinent part:

The District Judge to whom the case was assigned shall make a *de novo* determination of those portions of the report or specified proposed findings or recommendations to which objection is made and may accept, reject, or modify, in whole or in part, the findings or recommendations made by the Magistrate Judge.

Put another way, 28 U.S.C. § 636(b) and Local Rule 72.3 authorize the District Court Judge to address objections by conducting a *de novo* review of relevant evidence in the record before the Magistrate Judge. Parties are not permitted at the district court stage to raise new arguments or issues that were not presented to the magistrate. *Murr v. United States*, 200 F.3d 895, 902 n.1 (6th Cir. 2000), citing *United States v. Waters*, 158 F.3d 933 (6th Cir. 1998).

including the filing of a belated denial.” *Id.* Quoting *Chancellor v. City of Detroit*, 454 F. Supp. 2d 645, 666 (E.D. Mich.2006).

District courts have “considerable discretion” regarding whether to permit withdrawal or amendment under Rule 36(b), *Kerry Steel*, 106 F.3d at 154. The court's discretion must be exercised in light of Rule 36(b), which permits withdrawal (1) “when the presentation of the merits of the action will be subverted thereby,” and (2) “when the party who obtained the admission fails to satisfy the court that withdrawal or amendment will prejudice that party in maintaining the action or defense on the merits.” However, there must first be a motion upon which the Court may consider withdrawal as it is not permitted to act sua sponte. In regard to prejudice, “[t]he prejudice contemplated by [Rule 36(b)] is not simply that the party who initially obtained the admission will now have to convince the fact finder of its truth.” *Brook Village North Assoc. v. General Elec. Co.*, 686 F.2d 66, 70 (1st Cir.1982). Prejudice under Rule 36(b), rather, “relates to special difficulties a party may face caused by a sudden need to obtain evidence upon withdrawal or amendment of an admission.” *Kerry Steel*, 106 F.3d at 154.

A number of courts within this circuit have held that requests for admission which are deemed admitted by the default of a pro se litigant generally “cannot be the sole basis for granting summary judgment if [the non-responding party] was not warned in the requests for admissions of the consequence of failing to respond timely.” *Gordon v. Jones*, No. 3:08CV-P460-S, 2011 WL 847926, at *6, 2011 U.S. Dist. LEXIS 23320, at *14 (W.D. Ky. Mar. 8, 2011) (citing *Harris v. Callwood*, 844 F.2d 1254, 1256 (6th Cir. 1988)); see also *Gilliam v. Ordiway*, No. 15-cv-11833, 2016 WL 6803135, at *1, 2016 U.S. Dist. LEXIS 157801, at *8 (E.D. Mich. Oct. 20, 2016); *Morris v. Christian Cty. Sheriff's Dept.*, No. 5:12-CV-00156-TBR,

2013 WL 5934151, at *5, 2013 U.S. Dist. LEXIS 158240, at *5 (W.D. Ky. Nov. 5, 2013); *Jones-Bey v. Conrad*, No. 3:16-CV-723-DJH, 2020 WL 2736436, at *4 (W.D. Ky. May 26, 2020). There was no warning given to Lindstedt in the Requests for Admission propounded on him by Stefani. However, from his filings, Lindstedt appears familiar with the consequences of failing to timely respond to such requests. (See ECF # 27 at 5) (In Lake County litigation, Reo alleged Lindstedt's admissions proved his case. Lake County Court allowed Lindstedt to rescind his admissions on the eve of trial due to Reo's own discovery failures.) Furthermore, Plaintiff's summary judgment motion requested the use of such admissions as the primary basis for judgment and the Magistrate Judge gave Lindstedt additional time for discovery to respond to the summary judgment, presumably including an opportunity to move to withdraw his admissions. Lindstedt never formally or informally moved to withdraw, instead he appears to have unilaterally "withdrawn" his admissions without leave of court. Nor has Lindstedt submitted his responses to the Requests for Admissions to Stefani in the form and manner described in the Rule, if at all. Thus, this is not the case of a party inadvertently missing the deadline to submit their responses or not fully understanding the ramifications of missing the response time due to his pro se status.

The Sixth Circuit has held, "the lenient treatment generally accorded to pro se litigants has limits." *Pilgrim v. Littlefield*, 92 F.3d 413, 416 (6th Cir. 1996). Moreover, "pro se parties must follow the same rules of procedure that govern other litigants." *Barry Wilson v. Middle Tennessee State Univ. & The State of Tennessee*, No. 3:19-0798, 2021 WL 694181, at *5 (M.D. Tenn. Feb. 23, 2021); see also *Fields v. County of Lapeera*, 2000 WL 1720727 at *2 (6th Cir. Nov. 8, 2000). "Ordinary civil litigants that proceed pro se are not entitled to special treatment,

including assistance with responding to dispositive motions.” *Wilson* at *5 citing *Brock v. Hendershott*, 840 F.2d 339, 343 (6th Cir.1988). The Sixth Circuit has further held, “while pro se litigants may be entitled to some latitude when dealing with sophisticated legal issues, acknowledging their lack of formal training, there is no cause for extending this margin to straightforward procedural requirements that a layperson can comprehend as easily as a lawyer.” *Jourdan v. Jabe*, 951 F.2d 108, 109 (6th Cir. 1991). “Pro se litigants are not to be accorded any special consideration when they fail to adhere to readily-comprehended court deadlines.” *Id.* at 110.

Stefani filed her summary judgment on July 27, 2020, based on the admissions and on her affidavit, denying she is a transsexual and denying she is or ever was a prostitute. In a Declaration in Response to Motion for Summary Judgment, Asking for Discovery to be Extended to Cover All Parties Once Established (ECF # 27), Lindstedt requested an extension of discovery due to the sheer number of suits the Reos have filed against him and the passing of his domestic partner in August 2020. Lindstedt asked in his Declaration at ECF # 27 that discovery be extended because Stefani has refused to provide any discovery on her damages to Lindstedt. Lindstedt further represented that he will “answer” Stefani’s discovery requests including her Requests for Admissions on Lindstedt’s Church website. He further declared that he never called Stefani Reo a transsexual prostitute.

In response to Lindstedt’s Declaration, the Magistrate Judge held a telephone status conference with the parties in September 2020. After speaking with the parties, the Magistrate Judge ordered Lindstedt to mail his Initial Disclosures to Stefani within seven days and ordered Stefani to submit a statement to the Court on the status of her Initial Disclosures to Lindstedt.

The Magistrate Judge granted Lindstedt's Motion to Extend Discovery, ordering Lindstedt to file his Opposition to Stefani's summary judgment motion by November 9, 2020, and permitting the parties to engage in further discovery up to the response date, as necessary to oppose or reply to the pending dispositive motion.

On November 9, 2020, Lindstedt filed his Consolidated Opposition Reply Brief to the Reo's Motion for Summary Judgment. In the caption it further states, "Withdrawal of Silent Admissions." In his Opposition Brief, Lindstedt states he is submitting all his consolidated answers to Reo and is "withdrawing all silent admissions yet again." (Consolidated Brief in Opposition at 3). He continues in his brief: "Thus, since the admissions are withdrawn, then this Court can proceed to trial on the merits before a jury..." (*Id.* at 3-4). Later, Lindstedt asserts that "since the admissions have been withdrawn in the time frame of further discovery set by Magistrate Parker on September 8, 2020," the Reos have "no claim to summary judgment..." (*Id.* at 5). Lindstedt also continues to assert that Stefani Reo has failed to provide any basis for her damages. In his Objections at ECF# 44 to the Magistrate Judge's R & R, Lindstedt claims he has "overtly asked to withdraw the implied Rule 36 admissions" in his filing of November 9, 2020.

The Magistrate Judge determined that Lindstedt never moved to have his admissions withdrawn prior to the Report and Recommendation and the Court agrees. Instead, Lindstedt unilaterally withdrew his admissions because he did not want them used against him. However, he never provided direct answers to the Requests for Admission in the form required by Rule 36; and, insofar as this Court is aware, has still not done so, despite knowing that failure to do so may subject him to summary judgment.

The Court does not believe that Rule 36 or subsequent caselaw interpreting the same allows the Court to pick and choose which admissions will be withdrawn and which will be enforced when Lindstedt has not moved to withdraw any admissions. Because Lindstedt has not requested that only certain admissions be withdrawn, the Court must either withdraw all his admissions or none of them as the plain language of Rule 36 requires the withdrawal be “on motion;” and as the Magistrate Judge correctly determined, the Court may not withdraw admissions sua sponte. Lindstedt’s filings make clear he wants all his admissions withdrawn but he has never formally moved to do so and has never submitted his responses to the Requests.

Rule 36 is “intended to facilitate proof at trials by obviating the need to adduce testimony or documents as to matters that are really not in controversy. Thus, Fed. R. Civ. P. 36(a)(1)(A) permits requests for admissions as to ‘facts, the application of law to fact, or opinions about either.’” *Petroff-Kline*, 557 F.3d at 293, quoting Rule 36.

On consideration of Lindstedt’s and Stefani’s Objections, the Court agrees with the Magistrate Judge’s recommendation finding Lindstedt admitted the requests for admission and that these support the elements of Defamation and False Light. The Court will not construe the statement in his Objection that he overtly asked the Magistrate to withdraw his requests as a request for withdrawal because the docket demonstrates Lindstedt never moved to withdraw, despite knowing the consequences for failure to do so; and because Lindstedt has not provided responses even more than eight months after they were propounded on him.

Rule 36(b) also requires that the Court consider what prejudice, if any, Stefani faces should the Court grant withdrawal. Again, the prejudice the Court must guard against is that which “relates to special difficulties a party may face caused by a sudden need to obtain

evidence upon withdrawal or amendment of an admission.” *Kerry Steel*, 106 F.3d at 154. The Magistrate Judge found Stefani would be prejudiced by the continued scandalous and insulting filings of Lindstedt and the needless prolonging of the litigation. In her Objection, Stefani argues against withdrawal, contending that not only would she suffer the prejudice described by the Magistrate Judge, but would also have to present her claims in the absence of any discovery from Lindstedt, who failed to provide her discovery as requested and continues to submit slanderous filings at every opportunity. Moreover, Stefani has stated that expert witnesses declined to testify on her behalf for fear of Lindstedt.

The Court finds that much of the purported prejudice Stefani complains of is not the sort that would militate against withdrawal. Continued slanderous filings by Lindstedt do not relate to the special difficulties Stefani will face with the sudden need to obtain evidence. However, the fact that Lindstedt failed to provide evidence during discovery and has issued many threatening responses in his Court filings is particularly troubling to the Court and has clearly prejudiced Stefani’s ability to marshal evidence in her case.

Based upon Lindstedt’s continued scandalous, scurrilous and vitriol-laced filings, the Court will not show Lindstedt the leniency usually afforded pro se litigants. Holding him to the standards of practice required of counsel, the Court will not tolerate Lindstedt’s language in his filings and misuse of the judicial process. Nor will the Court search the record to find that any of his filings constitute a request to withdraw the admissions.

By Rule the admissions are deemed admitted and these admissions conclusively support Stefani’s claims for Defamation and False Light as found by the Magistrate Judge. “Rule 36(a) allows a party to request an admission even where the request seeks admission of ‘ultimate facts’

Supporting Factual Positions. A party asserting that a fact cannot be or is genuinely disputed must support the assertion by:

(A) citing to particular parts of materials in the record, including depositions, documents, electronically stored information, affidavits or declarations, stipulations (including those made for purposes of the motion only), **admissions**, interrogatory answers, or other materials.

See also *Jasar Recycling, Inc. v. Major Max Mgmt. Corp.*, No. 4:08CV2830, 2010 WL 395212, at *3 (N.D. Ohio Jan. 22, 2010) (holding that deemed admissions supported damage amounts claimed by plaintiff and granting summary judgment on the same.).

Therefore, because Lindstedt has not responded to Stefani's Requests for Admission nor moved to withdraw them, the Court adopts the Magistrate Judge's recommendation that they be deemed admitted and that these deemed admissions demonstrate there are no genuine issues of fact and Stefani is entitled to summary judgment on her Defamation and False Light claims against Lindstedt. Moreover, the Court adopts the Magistrate Judge's recommendation in the alternative that Stefani be granted summary judgment on these claims in the amount of \$250,000 in compensatory and \$250,000 in punitive damages against Lindstedt based on the same admissions. The Court further adopts the Magistrate Judge's recommendation that the Court deny summary judgment for Stefani on her IIED claim and her request for permanent injunction.

Pursuant to Stefani's representation in her Objection that she would dismiss these claims should the Court grant summary judgment on Counts I and II, the Court dismisses the claims in Counts III and IV.

The case shall proceed on Defendant's remaining claims.

IT IS SO ORDERED.

DATE: March 30, 2021

s/Christopher A. Boyko
CHRISTOPHER A. BOYKO
Senior United States District Judge

FILED

EXHIBIT

6

2019 OCT 16 PM 2:23
STATE OF OHIO
IN THE COURT OF COMMON PLEAS OF LAKE COUNTY
MAUREEN G. KELLY
LAKE CO. CLERK OF COURT
CIVIL DIVISION

BRYAN ANTHONY REO,

Plaintiff,

v.

MARTIN LINDSTEDT,

Defendant.

Case No. 15CV001590

Case No. 16CV000825

Hon. Patrick J. Condon

REO LAW LLC

By: Bryan Anthony Reo (#0097470)

P.O. Box 5100

Mentor, OH 44061

(P): (440) 313-5893

(E): Reo@ReoLaw.org

Pro Se Plaintiff & Attorney

MARTIN LINDSTEDT

338 Rabbit Track Road

Granby, MO 64844

(P): (417) 472-6901

(E): pastorlindstedt@gmail.com

Pro se Defendant

PLAINTIFF'S MOTION TO COMPEL
POST-JUDGMENT DISCOVERY

Plaintiff Pro Se, hereby makes this motion to compel Post Judgment Discovery, pursuant to Ohio Civ. R. 69, on the basis that Defendant Lindstedt provided absurd insults in response to Plaintiff's Post-Judgment Discovery and that Defendant has failed to meaningfully respond or cooperate. Defendant has not actually provided any of the requested information, information Plaintiff is entitled to.

Plaintiff therefore moves this Honorable Court to enter an order compelling Defendant to appear at Lake County Court of Common Pleas and provide answers to Plaintiff's Post-Judgment Discovery.

A brief and proposed order accompany this motion.

Respectfully submitted



Bryan Anthony Reo (#0097470)

Reo Law LLC

P.O. Box 5100

Mentor, Ohio 44061

(P): (440) 313-5893

(E): Reo@ReoLaw.org

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

BRYAN ANTHONY REO,

Plaintiff,

v.

MARTIN LINDSTEDT,

Defendant.

Case No. 15CV001590

Case No. 16CV000825

Hon. Patrick J. Condon

REO LAW LLC

By: Bryan Anthony Reo (#0097470)

P.O. Box 5100

Mentor, OH 44061

(P): (440) 313-5893

(E): Reo@ReoLaw.org

Pro Se Plaintiff & Attorney

MARTIN LINDSTEDT

338 Rabbit Track Road

Granby, MO 64844

(P): (417) 472-6901

(E): pastorlindstedt@gmail.com

Pro se Defendant

BRIEF IN SUPPORT OF PLAINTIFF'S
MOTION TO COMPEL POST JUDGMENT DISCOVERY

Plaintiff prevailed at a jury trial conducted in the consolidated case, verdict rendered June 26, 2019 and judgment duly entered upon that verdict in the amount of \$105,400 to date.

Plaintiff is entitled to broad post-judgment discovery to aid in executing upon the judgment.

Ohio Civ. R. 69 provides that Plaintiff, as a judgment creditor, may obtain discovery upon Defendant as the judgment debtor to aid in execution on the judgment.

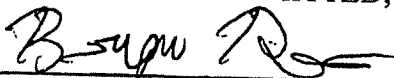
On September 6, 2019 Plaintiff served post judgment discovery upon Defendant in text modifiable format served in an electronic manner [see Exhibit 1 for the Discovery Propounded Upon Defendant, Exhibit 2- service of the same].

On October 4, 2019 Defendant provided non-responsive responses wherein he essentially told Plaintiff "I don't feel like answering these questions." [Exhibit 3- Defendant's "responses" and Exhibit 4- email from Defendant].

On October 4, 2019 Plaintiff emailed Defendant to explain that Defendant's answers were woefully deficient and non-responsive and to inquire as to when Defendant would be available to discuss the situation by phone. Defendant did not respond to the email but he posted a copy on his website [acknowledging he received it] along with mocking commentary. [Exhibit 5- email from Plaintiff to Defendant, Exhibit 6 post from Defendant's website].

Plaintiff is entitled to the post-judgment discovery he is seeking from Defendant and it was propounded in accordance with the Ohio Civil Rules. This Court should therefore compel Defendant to provide actual responses and provide the information requested or subject him to appear and attend a debtor's examination to be conducted pursuant to the Ohio Rules of Civil Procedure.

RESPECTFULLY SUBMITTED,

X 

REO LAW LLC

By: Bryan Anthony Reo (#0097470)
P.O. Box 5100
Mentor, OH 44061
(Business): (216) 505-0811

(Mobile): (440) 313-5893

(E): Reo@ReoLaw.org

Attorney and 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 **USPS First Class Mail** 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 16 day of October, 2019

X

Bryan Reo

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

BRYAN ANTHONY REO,

Plaintiff,

v.

MARTIN LINDSTEDT,

Defendant.

Case No. 15CV001590

Case No. 16CV000825

Hon. Patrick J. Condon

REO LAW LLC

By: Bryan Anthony Reo (#0097470)

P.O. Box 5100

Mentor, OH 44061

(P): (440) 352-6060

(E): BryanAReo@gmail.com

Pro Se Plaintiff & Attorney

MARTIN LINDSTEDT

338 Rabbit Track Road

Granby, MO 64844

(P): (417) 472-6901

(E): pastorlindstedt@gmail.com

Pro se Defendant

**ORDER GRANTING PLAINTIFF'S
MOTION TO COMPEL POST JUDGMENT DISCOVERY**

THIS MATTER came to be considered by the Court pursuant to the Plaintiff's Motion to Compel Post-Judgment Discovery filed by Plaintiff in the above-captioned cause. The Court having considered the Motion and being fully advised of the premises, it is, therefore,

ORDERED and ADJUDGED:

1. That the Plaintiff's Motion to Compel Post-Judgment Discovery is hereby granted.
2. Defendant shall provide responsive answers to Plaintiff's Post-Judgment Discovery no later than the ____ day of ____ 2019.
3. In the absence of good faith responsive answers, Defendant shall appear in person at a conference to be held on the ____ day of ____, 20__, at ____ am/pm to provide answers to Plaintiff's Post-Judgment Discovery.

DONE AND ORDERED in Chambers at Painesville, Lake County, Ohio this ____ day of _____, 2019.

PATRICK J. CONDON, JUDGE LAKE COUNTY COMMON PLEAS

Copies to:

Bryan Anthony Reo

Martin Lindstedt

Church of Jesus Christ Christian Aryan Nations of Missouri

Exhibit 1

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

BRYAN ANTHONY REO,

Plaintiff,

v.

MARTIN LINDSTEDT,

Defendant.

Case No. 15CV001590

Case No. 16CV000825

Hon. Patrick J. Condon

REO LAW LLC

By: Bryan Anthony Reo (#0097470)

P.O. Box 5100

Mentor, OH 44061

(P): (440) 313-5893

(E): Reo@ReoLaw.org

Pro Se Plaintiff & Attorney

MARTIN LINDSTEDT

338 Rabbit Track Road

Granby, MO 64844

(P): (417) 472-6901

(E): pastorlindstedt@gmail.com

Pro se Defendant

POST JUDGMENT DISCOVERY TO AID
IN EXECUTION OF JUDGMENT

Plaintiff Pro Se Bryan Anthony Reo, pursuant to Ohio Civil Rule 69, hereby propounds the following post-judgment discovery upon Defendant Martin Lindstedt to aid in the execution of the judgment recorded in Plaintiff's favor in the above-captioned case.

You are therefore required to answer these questions fully and accurately no later than twenty eight (28) days from the date of your receipt of these discovery requests.

1- Identify and provide contact information for anybody who has a lease or rental interest in the following parcels of land located in Stanley County, South Dakota. [parcels are identified by APN number] 1

1. Stanley County APN: 004676 owner: Martin Lindstedt, Lot area: 6,795,360 sq. ft
2. Stanley County APN: 003709 owner: Martin Lindstedt, Lot area: 6,676,920 sq. ft
3. Stanley County APN: 003710 owner: Martin Lindstedt, Lot area: 6,838,920 sq. ft
4. Stanley County APN: 003711 owner: Martin Lindstedt, Lot area: 6,969,600 sq. ft
5. Stanley County APN: 003712 owner: Martin Lindstedt, Lot area: 6,969,600 sq. ft
6. Stanley County APN: 003749 owner: Martin Lindstedt, Lot area: 6,969,699 sq. ft
7. Stanley County APN: 003750 owner: Martin Lindstedt, Lot area: 6,969,699 sq. ft
8. Stanley County APN: 003752 owner: Martin Lindstedt, Lot area: 6,969,699 sq. ft
9. Stanley County APN: 003761 owner: Martin Lindstedt, Lot area: 6,969,699 sq. ft
10. Stanley County APN: 004664 owner: Martin Lindstedt, Lot area: 1,306,800 sq. ft
11. Stanley County APN: 004667 owner: Martin Lindstedt, Lot area: 1,742,400 sq. ft
12. Stanley County APN: 004670 owner: Martin Lindstedt, Lot area: 1,742,400 sq. ft
13. Stanley County APN: 004674 owner: Martin Lindstedt, Lot area: 1,829,520 sq. ft
14. Stanley County APN: 004678 owner: Martin Lindstedt, Lot area: 2,657,160 sq. ft
15. Stanley County APN: 008518 owner: Martin Lindstedt, Lot area: 3,484,800 sq. ft

2- Provide copies of any and all lease or rental agreements between yourself and any individual or corporate entity that is in any way operating on, renting, or leasing the above-listed parcels in Stanley County South Dakota.

3- Provide the receipts showing payments of property taxes on the residence 338 Rabbit Track Road, Granby, Missouri.

4- Provide the most recent appraisal of the value of the real property located at 338 Rabbit Track Road, Granby, Missouri.

5- Provide the bank name, address of the bank, account numbers, and current balances of any banks with which you maintain financial accounts of any sort.

6- Provide an exhaustive list of all of your firearms, by manufacturer, model, caliber, and serial number.

Sincerely,

/S/ BRYAN ANTHONY REO
Bryan Anthony Reo (#0097470)
Reo Law LLC
P.O. Box 5100
Mentor, Ohio 44061
(P): (440) 313-5893
(E): Reo@ReoLaw.org

Certificate of Service

I, Bryan Reo, do hereby certify that a true and genuine copy of the foregoing has been dispatched by electronic mail to the Defendants at:

pastorlindstedt@gmail.com

On this 6 day of September, 2019

X /S/ BRYAN ANTHONY REO

Bryan Reo

From: Bryan Reo
Sent: Friday, September 6, 2019 1:08 PM
To: Martin Lindstedt
Subject: Reo v Lindstedt Post-Judgment Discovery
Attachments: Reo v Lindstedt Marty Post Judgment Discovery.pdf; Reo v Lindstedt Marty Post Judgment Discovery.docx

Dear Mr. Lindstedt,

Please find attached post-judgment discovery devices which you are required by the Ohio Civil Rules to answer.

Please feel free to email me with any questions or points for clarification. I look forward to your answers and to working with you to aid in the execution on the judgment that was rendered in Lake County Court of Common Pleas.

Your cooperation will be greatly appreciated. Please note that if you do not cooperate, the court may have to intervene and compel your attendance at a debtor's examination to be conducted in Lake County Ohio.

Sincerely,

Bryan Anthony Reo

Bryan Anthony Reo (#0097470)
REO LAW LLC
P.O. Box 5100
Mentor, Ohio 44061
(Business): (216) 505-0811
(Personal): (440) 313-5893

Admissions- Ohio Courts and Agencies [#0097470], N.D. Ohio, S.D. Ohio, E.D. Michigan, W.D. Michigan, 3rd Circuit, 6th Circuit, and Court of Appeals for the Armed Forces (#37033)

This electronic mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain private, confidential, and/or privileged information. Any unauthorized review, use, disclosure, or distribution is strictly prohibited, and interception of the same is a federal criminal offense per 18 U.S.C. § 2511. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

Exhibit 3

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

BRYAN ANTHONY REO,

Plaintiff,

v.

MARTIN LINDSTEDT,

Defendant.

Case No. 15CV001590

Case No. 16CV000825

Hon. Patrick J. Condon

REO LAW LLC

By: Bryan Anthony Reo (#0097470)

P.O. Box 5100

Mentor, OH 44061

(P): (440) 313-5893

(E): Reo@ReoLaw.org

Pro Se Plaintiff & Attorney

MARTIN LINDSTEDT

338 Rabbit Track Road

Granby, MO 64844

(P): (417) 472-6901

(E): pastorlindstedt@gmail.com

Pro se Defendant

POST JUDGMENT DISCOVERY TO AID
IN EXECUTION OF JUDGMENT

Plaintiff Pro Se Bryan Anthony Reo, pursuant to Ohio Civil Rule 69, hereby propounds the following post-judgment discovery upon Defendant Martin Lindstedt to aid in the execution of the judgment recorded in Plaintiff's favor in the above-captioned case.

=====

Pastor Lindstedt's Response: Revised Statute of Missouri 74.14(d) and even Ohio Revised Code 2329.02 which says much the same thing:

RSMo 74.14(d) Stay.

(1) If the judgment debtor shows the circuit court that an appeal from the foreign judgment is pending or will be taken or that a stay of execution has been granted, the court shall stay

enforcement of the foreign judgment until the appeal is concluded, the time for appeal expires, or the stay of execution expires or is vacated upon proof that the judgment debtor has furnished the security for the satisfaction of the judgment required by the state in which it was entered.

In short, while a civil case is under appeal and subject to review, repeal, alteration or change then it doesn't make much sense for any execution to take place and force the "judgment debtor" to pay and then have to collect his property back if the case is dismissed or altered. I can well imagine trying to get my property back from you once this bogus case gets dismissed eventually and I get you and your lawyer friends disbarred (which might happen someday in a better world). Giving you access to my personal financial information is a non-starter. We've been through this stuff before where you go way over the line and then don't dare complain before a judge when I refuse to go along. Yet you whine for "sanctions" when it is you who must be sanctioned.

I did look at your lies to the contrary when you filed in Newton County however, but like everything you say most of it is a lie of a series of lies.

■ Pastor Martin Lindstedt CJCC/AN

You are therefore required to answer these questions fully and accurately no later than twenty eight (28) days from the date of your receipt of these discovery requests.

Today see my responses which are mainly objections on Friday, Oct. 4, 2019 which is 28 days from when I received your barratry.

1- Identify and provide contact information for anybody who has a lease or rental interest in the following parcels of land located in Stanley County, South Dakota. [parcels are identified by APN number]

I think I'll pass as I don't need you disturbing people who have leased from my family for over 50 years.

So when did a greedy mongrel like you find out about my inheritance? In 2013 or 2014 so then you filed the defamation claims over three years from when I responded in kind to you calling me a convicted child molester? Who told you about my property? Liar Bill 'MumpsNut' DeClue? – Pastor Martin Lindstedt

2- Provide copies of any and all lease or rental agreements between yourself and any individual or corporate entity that is in any way operating on, renting, or leasing the above-listed parcels in Stanley County South Dakota.

I'll pass for now. Maybe when you have gone through proper court procedure in South Dakota. – Pastor Martin Lindstedt

3- Provide the receipts showing payments of property taxes on the residence 338 Rabbit Track Road, Granby, Missouri.

What you want my hovel / homestead in Missouri? I seen where you made one of your threats like a coward. But then again, whenever you feel cowardly you like to threaten to murder or rape or assault someone. You really are not supposed to act like this even for you.. – Pastor Martin Lindstedt

4- Provide the most recent appraisal of the value of the real property located at 338 Rabbit Track Road, Granby, Missouri.

Me and Roxie paid \$3000 when we bought it together at the tail end of 1987. That must be the place a degenerate mongrel like you threatened to sell at a Sheriff's sale. Well, your kind likes to live off the White folks. And I know that you or your kind don't have much use for women. You were suing an elderly fat illiterate woman with a broken hip because you hate White women who are genetic females. Anyways, it certainly isn't worth much even in 2019.

Pass on talking more about this. Pastor Martin Lindstedt CJCC/AN

5- Provide the bank name, address of the bank, account numbers, and current balances of any banks with which you maintain financial accounts of any sort.

You are over-reaching yet again. Pastor Martin Lindstedt CJCC/AN

6- Provide an exhaustive list of all of your firearms, by manufacturer, model, caliber, and serial number.

All of which goes to show that this series of questions isn't legitimate, Bryan Reo. You simply cannot help yourself though.

I don't think I have a tenth as many guns as a fearful pathetic mongrel like you does. I can't imagine ever a jew gliberal judge approving your asking me for a list of my guns. Why on Quora you are so much more, well, let us say, 2d Amendment-ish. But we both know you are a fraudulent and cowardly mongrel.

Not nearly \$100,000 worth or even \$50 or \$10 thousand worth. Maybe \$2000 worth. And nothing exotic. Nary an AR-15 poodle-shooter either.

Who do you think you are fooling? After nearly a decade in fighting with you I know most of your tricks, which were old when Satan tempted Eve. Want to tell me all about your guns?

Hail Victory !!!

-s- Pastor Martin Lindstedt

Pastor Martin Lindstedt

Church of Jesus Christ Christian / Aryan Nations of Missouri

Certificate of Service

I, Pastor Martin Lindstedt, do hereby certify that a true and genuine copy of the foregoing has been dispatched by electronic mail to Bryan Reo at reo@reolaw.com on Friday October 4 2019.

Mart Lindstedt Pastor CJCC/ANP

Bryan Reo

From: Martin Lindstedt <pastorlindstedt@gmail.com>
Sent: Friday, October 4, 2019 6:39 PM
To: Bryan Reo; pastorlindstedt
Subject: Re: Reo v Lindstedt Post-Judgment Discovery
Attachments: Post-JudgmentDiscovery_4Oct19.pdf

28 Days later see my response to your improper "Post-Judgment" "Discovery" Requests. You always over-reach and are full of deceit like your spiritual Father. Which is why I take cocontact with you to the least amount whatsoever. I wish it wasn't my racial duty to have to deal with you at all to keep you out of the Christian Israelite Body of Christ.

I usually detest having anything to do with you, however, I hereby timely render objections to your bad-faith efforts sent to my e-mail 28 days ago.

This is the pdf link:

http://bryanreo-lawsuits.xyz/2019/NewtonCounty/Oct19/4Oct19_ML/Post-JudgmentDiscovery_4Oct19.pdf

You can see the rest of the matter at the following link on my forum which you obsessively follow:
<http://whitenationalist.org/forum/showthread.php?p=20307#post20307>

Hail Victory !!!

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

On Fri, Sep 6, 2019 at 12:08 PM Bryan Reo <reo@reolaw.org> wrote:

Dear Mr. Lindstedt,

Please find attached post-judgment discovery devices which you are required by the Ohio Civil Rules to answer.

Please feel free to email me with any questions or points for clarification. I look forward to your answers and to working with you to aid in the execution on the judgment that was rendered in Lake County Court of Common Pleas.

Your cooperation will be greatly appreciated. Please note that if you do not cooperate, the court may have to intervene and compel your attendance at a debtor's examination to be conducted in Lake County Ohio.

Sincerely,

Bryan Anthony Reo

Bryan Anthony Reo (#0097470)
REO LAW LLC
P.O. Box 5100
Mentor, Ohio 44061

(Business): (216) 505-0811

(Personal): (440) 313-5893

Admissions- Ohio Courts and Agencies [#0097470], N.D. Ohio, S.D. Ohio, E.D. Michigan, W.D. Michigan, 3rd Circuit, 6th Circuit, and Court of Appeals for the Armed Forces (#37033)

This electronic mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain private, confidential, and/or privileged information. Any unauthorized review, use, disclosure, or distribution is strictly prohibited, and interception of the same is a federal criminal offense per 18 U.S.C. § 2511. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

Exhibit 5

Bryan Reo

From: Bryan Reo <reo@reolaw.org>
Sent: Friday, October 4, 2019 7:36 PM
To: Martin Lindstedt
Subject: Re: Reo v Lindstedt Post-Judgment Discovery

Sir,

Your responses are woefully deficient and unacceptable. What time tomorrow are you available to discuss the matter by phone?

Sincerely,

Bryan Anthony Reo

Bryan Anthony Reo (#0097470)
REO LAW LLC
P.O. Box 5100
Mentor, Ohio 44061
(Business): (216) 505-0811
(Personal): (440) 313-5893

Admissions- Ohio Courts and Agencies [#0097470], N.D. Ohio, S.D. Ohio, E.D. Michigan, W.D. Michigan, 3rd Circuit, 6th Circuit, and Court of Appeals for the Armed Forces (#37033)

This electronic mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain private, confidential, and/or privileged information. Any unauthorized review, use, disclosure, or distribution is strictly prohibited, and interception of the same is a federal criminal offense per 18 U.S.C. § 2511. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

On October 4, 2019 6:39:46 PM Martin Lindstedt <pastorlindstedt@gmail.com> wrote:

28 Days later see my response to your improper "Post-Judgment" "Discovery" Requests. You always over-reach and are full of deceit like your spiritual Father. Which is why I take contact with you to the least amount whatsoever. I wish it wasn't my racial duty to have to deal with you at all to keep you out of the Christian Israelite Body of Christ.

I usually detest having anything to do with you, however, I hereby timely render objections to your bad-faith efforts sent to my e-mail 28 days ago.

This is the pdf link:

http://bryanreo-lawsuits.xyz/2019/NewtonCounty/Oct19/4Oct19_ML/Post-JudgmentDiscovery_4Oct19.pdf

You can see the rest of the matter at the following link on my forum which you obsessively follow:

[:http://whitenationalist.org/forum/showthread.php?p=20307#post20307](http://whitenationalist.org/forum/showthread.php?p=20307#post20307)

Hail Victory !!!

Pastor Martin Lindstedt

Church of Jesus Christ Christian / Aryan Nations of Missouri

On Fri, Sep 6, 2019 at 12:08 PM Bryan Reo <reo@reolaw.org> wrote:

Dear Mr. Lindstedt,

Please find attached post-judgment discovery devices which you are required by the Ohio Civil Rules to answer.

Please feel free to email me with any questions or points for clarification. I look forward to your answers and to working with you to aid in the execution on the judgment that was rendered in Lake County Court of Common Pleas.

Your cooperation will be greatly appreciated. Please note that if you do not cooperate, the court may have to intervene and compel your attendance at a debtor's examination to be conducted in Lake County Ohio.

Sincerely,

Bryan Anthony Reo

Bryan Anthony Reo (#0097470)
REO LAW LLC
P.O. Box 5100
Mentor, Ohio 44061

(Business): (216) 505-0811

(Personal): (440) 313-5893

Admissions- Ohio Courts and Agencies [#0097470], N.D. Ohio, S.D. Ohio, E.D. Michigan, W.D. Michigan, 3rd Circuit, 6th Circuit, and Court of Appeals for the Armed Forces (#37033)

This electronic mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain private, confidential, and/or privileged information. Any unauthorized review, use, disclosure, or distribution is strictly prohibited, and interception of the same is a federal criminal offense per 18 U.S.C. § 2511. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

from: Martin Lindstedt <pastorlindstedt@gmail.com>
to: Bryan Reo <reo@reolaw.org>, pastorlindstedt <pastorlindstedt@gmail.com>
date: Oct 4, 2019, 5:39 PM
subject: Re: Reo v Lindstedt Post-Judgment Discovery

28 Days later see my response to your improper "Post-Judgment" "Discovery" Requests. You always over-reach and are full of deceit like your spiritual Father. Which is why I take coontact with you to the least amount whatsoever. I wish it wasn't my racial duty to have to deal with you at all to keep you out of the Christian Israelite Body of Christ.

I usually detest having anything to do with you, however, I hereby timely render objections to your bad-faith efforts sent to my e-mail 28 days ago.

This is the pdf link:

http://bryanreo-lawsuits.xyz/2019/Ne...ery_4Oct19.pdf

You can see the rest of the matter at the following link on my forum which you obsessively follow:

:<http://whitenationalist.org/forum/sh...0307#post20307>

Hail Victory !!!

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

Exhibit 6

Pastor Lindstedt's Web Page

Pastor Lindstedt's Archive Page & Christian Nationalist Forum

10-04-2019 07:48 PM


#15

[Reply With Quote](#)



Bryan Reo ◌
Satanic Mongrel Abomination
Veteran Member
00000000

Join Date: Oct 2010
Location: The Mamzer from
Mentor Ohio
Posts: 235

 As a Satanic Mamzer Abomination & Oreficer of Judge Condon's Kort I forget that I Must Appear Reasonable

**As a Satanic Mamzer Abomination & Oreficer of Judge
Condon's Kort I forget that I Must Appear Reasonable,
Hiding Muh Tail & Hoofs & Mangina From View**

***I Cum-cum cum-cum-pletely Forgot There is a Hearing on Pre-Trial Interest
before Judge Condon on Monday 7 Oct. 2019 @ 9:30am EST and I Must Not
Appear As A Greedy Rude Mongrel***

<http://whitenationalist.org/forum/sh...0436#post20436>
<http://christian-identity.net/forum/...0436#post20436>
<http://whitenationalist.org/forum/sh...0436#post20436>

/mail.google.com/mail/u/0/#inbox/FMfcgxwDqXsVDbtKfmZQfHMGkhqbx

Search mail



1 of 32970
6:36 PM (2 hours ago)

Bryan Reo
to me

Sir,

from: Bryan Reo <reo@reolaw.org>

to: Martin Lindstedt <pastorlindstedt@gmail.com>

date: Oct 4, 2019, 6:36 PM

subject: Re: Reo v Lindstedt Post-Judgment Discovery

mailed-by: reolaw.org

signed-by: NETORGET 4006876.omnicrosoft.com

security: A Standard encryption (TLS) [Learn more](#)

Important mainly because you often read messages with this label.

Bryan

REO LAW LLC

P.O. Box 5100

Mentor, Ohio 44061

(Business): (216) 505-0811


(Personal): (440) 313-5893

Admissions- Ohio Courts and Agencies (#D097470), N.D. Ohio, S.D. Ohio, E.D. Michigan, W.D. Michigan, 3rd Circuit, 6th Circuit, and Court of Appeals for the Armed Forces (#37033)

This electronic mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain private, confidential and/or privileged information. Any unauthorized review, use, disclosure, or distribution is strictly prohibited, and interception of the same is a federal criminal offense per 18 U.S.C. § 2511. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

On October 4, 2019 6:33:46 PM Martin Lindstedt <pastorlindstedt@gmail.com> wrote:

/mail.google.com/mail/u/0/#inbox/FMfcgxDqXSVDbtKfmZQfMGkhlhqbX

 Search mail

1 of 32,970

 Bryan Reo
to me

6:36 PM (2 hours ago)



Sir,

Your responses are woefully deficient and unacceptable. What time tomorrow are you available to discuss the matter by phone?

Sincerely,

Bryan Anthony Reo

Bryan Anthony Reo (#0097470)
REO LAW LLC
P.O. Box 5100
Mentor, Ohio 44051
(Business): (216) 505-0811
(Personal): (440) 313-5893

Admissions- Ohio Courts and Agencies [#0097470], N.D. Ohio, S.D. Ohio, E.D. Michigan, W.D. Michigan, 3rd Circuit, 6th Circuit, and Appeals for the Armed Forces (#37033)

This electronic mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain private, confidential or privileged information. Any unauthorized review, use, disclosure, or distribution is strictly prohibited, and interception of the same is a federal criminal offense per 18 U.S.C. § 2511. If you are not the intended recipient of this message or their agent, or if this message is addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments, if you are the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

On October 4, 2019 6:39:46 PM Martin Lindstedt <pasforlindstedt@gmail.com> wrote:

from: Bryan Reo <reo@reolaw.org>
to: Martin Lindstedt <pastorlindstedt@gmail.com>
date: Oct 4, 2019, 6:36 PM
subject: Re: Reo v Lindstedt Post-Judgment Discovery
mailed-by: reolaw.org
signed-by: NETORGFT4006876.onmicrosoft.com
security: Standard encryption (TLS) Learn more
: Important mainly because you often read messages with this label.

Sir,

Your responses are woefully deficient and unacceptable. What time tomorrow are you available to discuss the matter by phone?

Sincerely,

Bryan Anthony Reo

Bryan Anthony Reo (#0097470)
REO LAW LLC
P.O. Box 5100
Mentor, Ohio 44061
(Business): (216) 505-0811
(Personal): (440) 313-5893

666 666 666

This profile of a limited-purpose public figure Attorney Bryan Reo is definitely NOT authorized by Bryan Reo, but is meant to keep the public informed as to what this