STATE OF OHIO IN THE MENTOR MUNICIPAL COURT CIVIL DIVISION

BRYAN ANTHONY REO,)	
Plaintiff,)	
)	Case No. 16CVE00245
VS.)	Judge John Trebits
)	DEFENDANTS' ANSWER
CHURCH OF JESUS CHRIST CHRISTIAN)	& COUNTER-CLAIM
ARYAN NATIONS OF MISSOURI, PASTOR)	
MARTIN LINDSTEDT, ARCHDEACONESS)	
ROXIE FAUSNAUGHT, DIRECTORS,)	
)	
Defendant(s).)	

DEFENDANTS CHURCH OF JESUS CHRIST CHRISTIAN / ARYAN NATIONS OF MISSOURI, PASTOR MARTIN LINDSTEDT'S, AND ROXIE FAUSNAUGHT'S ANSWER & COUNTER-CLAIM

COMES NOW all of the Defendants, The Church of Jesus Christ Christian / Aryan

Nations of Missouri (hereafter Church), Pastor Martin Lindstedt, and Roxie Fausnaught, a

director of the Church non-profit (who makes an additional Answer & Counter-Claim against

Plaintiff Bryan Reo to make the following Answer & Counter-claim to Bryan Reo's fraudulent,

perjurous, and malicious Civil Complaint and abuse of legal process to this Mentor Municipal

Court, a court of absolutely no jurisdiction -- subject matter or personal concerning Internet

communications over international and interstate borders -- by a professional plaintiff pro se who

has already filed substantially the same case and lost it before the federal district courts of the

Northern District of Ohio and Western District of Missouri and which is pending before the 8th

U.S., Circuit Court of Appeals and also the Lake County Ohio Court of Common Pleas. This case before this Mentor Municipal Court is the fourth or fifth instance and in none of the previous instances has Bryan Reo been able to file a satisfactory response to why Reo has a case. This Court will likely find itself presiding over a case involving dozens of defendants across state and national borders in which they too will raise jurisdictional questions and defenses. Indeed this Court will likely become a party in this case involving the delusions of a vexatious litigant thinking that he gets to censor the Internet because Pastor Lindstedt publishes public records involving Bryan Reo's fraudulent and vexatious litigation. If two U.S. District Courts, one in Cleveland and one in Missouri found that they lacked jurisdiction to hear Bryan Reo's case, then this Mentor Municipal Court is highly improbable to be able to hear this fraudulent case as well.

However, all Defendants must make an Answer to Bryan Reo's latest vexatious and frivolous case before this Court of absolutely nil jurisdiction. Defendant Roxie Fausnaught makes an additional Answer and a Counter-Claim that Plaintiff Bryan Reo be summarily adjudged as making an abusive and frivolous vexatious Civil Complaint absent any merit and essentially fined \$15,000 for abuse of legal process as this Court has jurisdiction to do this upon being presented with this frivolous case. See Defendant Roxie Fausnaught's Answer & Counter-Claim of two pages. Defendants Church and Pastor Lindstedt however want this case to proceed so that Bryan Reo's co-conspirators like Bryan Reo's father Anthony D. Reo, William Finck, Finck's pretend church Christogenea.org, Bryan Reo's attorney Kyle Bristow can be disbarred and civilly prosecuted. There are around forty other Reo Co-Conspirators who will be roped into this case pending discovery and joinder unless this Mentor Municipal Court declines to excise the pretense of jurisdiction for International and Interstate communications. If every little municipal and county court can shut down the Internet based upon a serial fraudster's vexatious

complaint and abuse of legal process, then there won't be an Internet any more than there can be international and interstate trade and travel if every petty robber baron with a patent of nobility sets up a brigandage toll. This Court might well find it far easier to have prosecuted Bryan Reo.

I. INTRODUCTION

1. Plaintiff is suing Defendants for engaging in a vicious campaign of defamatory and criminal harassment against Plaintiff via the medium of the World Wide Web, which has become so severe that Plaintiff was awarded a civil stalking protection order against Lindstedt by the Lake County Court of Common Pleas after an evidentiary hearing. (Exhibit A - Civil Stalking Protection Order).

Answer: Plaintiff Bryan Reo's fraudulent claim before this Mentor Municipal Court of "tortuous and criminal conduct related to Defendant's campaign of 'cyber harassment' against Plaintiff via the World Wide Web" is fraudulent in that Plaintiff Bryan Reo routinely threatened to murder. rape and assault both Pastor Lindstedt and others when Bryan Reo had benefit of Internet anonymity, and then when in Oct. 2010 Bryan Reo was identified, with public social media profiles and Reo's past history, Bryan Reo and Reo co-conspirators immediately violated the Digital Millennium Copyright Act (hereafter the DMCA) 17 U.S.C. § 512 by taking down a dozen of Pastor Lindstedt's Church web pages, and those of other parties, committed criminal conspiracies violating 18 U.S.C. § 241 and 242 and violated Pastor Lindstedt and The Church's and Lindstedt's civil rights to freedom of speech and religion under color of law, thus civilly liable in the federal jurisdiction under 42 U.S.C. § 1983 and 1984. Upon having his meritless federal case dismissed for failure to state a valid claim despite being given over a month to do so, Bryan Reo decided to file this vexatious and frivolous litigation before the Lake County Court which is pending. Bryan Reo committed fraud and perjury in order to obtain a fraudulent civil stalking order (Reo's Exhibit A) This stalking order is being contested as of now and will be

litigated in the Ohio and federal courts. A petty criminal conspirator cannot and will not be able to censor the World Wide Web upon frivolous litigation before a local county court in Ohio.

These are the past and current civil cases from the past six months:

Reo v. Lindstedt, 14-5093-CV-SW-MJW WDMo dismissed

Reo v. Lindstedt, 15-3756 8th Circuit Court of Appeals (pending) Asking that the DMCA be declared unconstitutional and Bryan Reo and Reo conspirators prosecuted federally

Reo v. Lindstedt, Lake County Ohio, 15CV00590, pending for trial 2 Aug. 2016

Reo v. Lindstedt, Lake County Ohio, CS16000102, pending appeal, bogus stalking case

Reo v. Aryan Nations, et. al, Mentor Municipal Court /CVE 1600245 this particular case

In short, Bryan Reo files these cases, and is unable to keep these frivolous and fraudulent cases intact. These Lake County Ohio cases will eventually be placed before the federal level in any case upon appeal as Bryan Reo cannot effectively prosecute his frivolous cases. All Bryan Reo is able to do is to file a dozen motions to strike and for summary judgment which cannot be granted. When asked to state a cause upon which relief can be granted, Reo's cases fall apart.

II PARTIES

2. Plaintiff is a natural person who resides in and is a citizen of the State of Ohio.

Admitted: (Civ.R.8B) Bryan Reo resides with his father, Anthony D. Reo at 7143 Rippling Brook Lane, Mentor Ohio 44060.

Counter-claim, (Civ. R.13): Bryan Reo is engaged in a criminal conspiracy with his father, Anthony D. Reo who owns the house Bryan Reo lives in. There are around 40-50 additional parties who will be joindered to this frivolous and vexatious litigation by Bryan Reo as it works its way through this Mentor Municipal Court absent jurisdiction to the state and then to the federal levels which have jurisdiction over interstate and international Internet communications.

3. Church is a non-profit corporation existing by and through the law of the State of Missouri, which has Lindstedt as a director and Fausnaught as both a director and its registered agent.

Admitted: (Civ.R.8B) & Denied Counter-Claim Civ.R.13. The Church is a non-profit corporation existing through the law of the State of Missouri. This Church owns the web pages which Bryan Reo maliciously and fraudulently destroyed. Under the DMCA, Bryan Reo and Reo co-conspirators are responsible for damages and attorney's fees.

- 4. Lindstedt is a natural person who resides in and is a domiciliary of the State of Missouri.
- 5. Fausnaught is a natural person who resides in and is a domiciliary of the State of Missouri. Admitted: (Civ.R.8B) & Denied Counter-Claim Civ.R.13. Insofar as both Pastor Lindstedt and Roxie Fausnaught are concerned, Bryan Reo is abusing legal process with this frivolous litigation. Roxie Fausnaught presents a Counter-Claim that this frivolous case of Bryan Reo's should be dismissed against herself and she should be summarily awarded \$15,000 plus costs against Bryan Reo for abuse of legal process. Pastor Lindstedt and the Church are willing to let this case continue against them as parties because Bryan Reo and Reo co-conspirators will lose and it is desired that they be criminally prosecuted at the local and federal and state levels.

III JURISDICTION AND VENUE

- 6. This Court enjoys subject matter jurisdiction because Plaintiff seeks a money judgment against Defendants in an amount of money no greater than \$15,000.00. R.C. § 1901.17.
- 7. This Court enjoys personal jurisdiction over Defendants because Defendants have intentionally caused tortious injury—via the medium of an interactive website on the World Wide Web—to Plaintiff in the State of Ohio by an act outside the State of Ohio which Defendants might reasonably have expected would cause Plaintiff to be injured thereby in the State of Ohio. R.C. § 2307.382(A)(7); Civ.R. 4.3(A)(9); Kauffman Racing Equipment, L.L.C., v. Roberts, 126 Ohio St.3d 81, 2010-Ohio-2551 (Ohio 2010).

8. Venue is proper with this Court because Defendants are residents of the State of Missouri, and Plaintiff resides in the territorial jurisdiction of the Court. Civ.R. 3(B)(7). IV.

Civ.R.8(B)(C) Denial., Civ. R.13 Counter-claim. One of the benefits of being sued by a perjurous criminal with delusions of being an attorney came at the 17 Dec. 2015 Scheduling Conference in Reo v. Lindstedt, 15CV001590 when in front of Magistrate Kenneth Roll Pastor Lindstedt pointed out when Roll was whining about the unsuitability of Pastor Lindstedt's Answer & Counter-Claim to Reo's fraudulent civil complaint before the Lake County Court and how Bryan Reo "wrote like an attorney" Pastor Lindstedt asked if that is why Bryan Reo did such a good job of writing a Motion to Dismiss for both William Finck and Melissa Epperson. Roll kept on ovulating as to why the Motions were substantially identical and they sounded like an attorney wrote them. The reason that they were identical is because Bryan Reo drafted them for Reo's co-conspirators Finck and Epperson. Reo then admitted that he was in contact with Finck and Epperson. Magistrate Roll then accused Reo of "unauthorized practice of law." But all Roll did was to tut-tut over this criminal activity by Bryan Reo as opposed to dismissing the Reo lawsuit and jailing for criminal contempt the wonderful unauthorized practice of law by Reo.

Bryan Reo has agreed with some of his conspirators to draft Motions disproving that there is any real jurisdiction in local county courts. Therefore, Bryan Reo has performed an act of perjury and criminal conspiracy before not only the Lake County Court, but this Mentor Municipal Court as well.

Wherefore, Pastor Lindstedt and Lindstedt's Church and Roxie Fausnaught want to point out to where Bryan Reo admitted that there is no proper or real jurisdiction whatsoever: http://christian-identity.net/forum/showthread.php?p=13756#post13756 (Exhibit 1) http://bryanreo-lawsuits.xyz/ReovLindstedt_15CR001590/2015/Dec15/7Dec15/Finck%20Motion%207Dec15.pdf

Pastor Lindstedt suspects that a jury isn't going to appreciate this deceit by Bryan Reo much, nor are the state and local and federal prosecuting attorneys. After all, if Reo coconspirators Bill Finck and Melissa Epperson are free of jurisdiction from this case being heard in Ohio, then so too do Pastor Lindstedt, Roxie Fausnaught and their Church as well.

IV STATEMENT OF REO-"FACTS"

9. Plaintiff is a private figure for purposes of substantive defamation and invasion of privacy law. New York Times Co. v. Sullivan, 376 U.S. 254 (1964); Gertz v. Robert Welch, Inc., 418 U.S. 323 (1972).

Denied: (Civ. R. 8B) Contrary to Bryan Reo's assertion that he is a private – not a public – figure, in point of fact Bryan Reo used to have a blog claiming that he was running for an Ohio state assembly seat. But more to the point, Bryan Reo is a notorious Anti-Racist Activist with a public past under a White Nationalist Movement leader named Richard Barrett from 2000-2005 until Richard Barrett declared Reo wasn't white and that Reo would have to get used to it. Then around 2009, Bryan Reo resurfaced with "Pastor" Eli James to bring in William Raymond Finck as "Dual-Seedline" Christian Identity pastors and claimed to be a pastor and prominent White Nationalist racial activist of sorts himself. Bryan Reo took made fraudulent DMCA complaints and took down around a dozen of Pastor Lindstedt's Church's web pages, along with those of others as well. Reo maintains a blog at http://bryanreo.blogspot.com/ and another one on William Finck's Christogenea web page as well: http://sb.christogenea.org/blog/ where Reo used to reprint Eli James' claim that Pastor "Lindstedt was a convicted child molester" before taking that *libel per se* down in order to file his bogus litigation in federal court. Furthermore there was a Bryan Reo Talkshoe podcast channel in which Bryan Reo would claim that Pastor Lindstedt was a convicted child molester and brag – along with Reo's co-conspirators – about taking down Pastor Lindstedt and Lindstedt's Church's forums, blogs, web pages under color of the DMCA and where the DMCA didn't apply, in Montreal Canada. (By the way, recently Bryan Reo and William Finck took down the Bryan Reo blog in its entirety.

Bryan Reo also used to display a public Talkshoe podcasting channel at: http://www.talkshoe.com/talkshoe/web/talkCast.jsp?masterId=31407&cmd=tc Bryan Reo was formerly known as "SwordBrethren" and claimed to be a Teutonic Knight on StormFront and other forums. This Talkshoe Channel is currently "disabled" but can always be re-enabled by Bryan Reo and there are many shows in which Bryan Reo call Pastor Lindstedt a "child molester" and "pedophile" among other malicious things.

In short, contrary to Bryan Reo's claims, within White Nationalism in general and Christian Identity in particular, Bryan Reo is a well-known, infamous even, limited purpose public figure. Hence the standard in a libel and defamation lawsuit is *Hustler Magazine, Inc., v. Falwell*, 485 U.S. 46, (1988) and *New York Times v. Sullivan*, 376 U.S. 254. All Pastor Lindstedt has done is to point out that Bryan Reo's public Facebook profile picture, along with other social media pages such as Xuqa.com in which Bryan Reo showed his face, proves that Bryan Reo isn't even remotely white, hence not a real Christian Identity or White Nationalist leader. Bryan Reo's complaint in Lake County concerns how Lindstedt has allegedly published public records concerning Reo from the federal district court case and before this municipal court that Lindstedt and Lindstedt's Church have published public records from Reo's local cases as well.

10. Church maintains an interactive and publicly-accessible website on the World Wide Web at http://christian-identity.net!forum ("Church Website").

Admitted. Pastor Martin Lindstedt has published on the Official Church Web Site sundry public records, especially those of Bryan Reo's frivolous federal and state lawsuits against Pastor Lindstedt's Church web pages and two or three of the now dozens of Bryan Reo's fraudulent and perjurous abuse of legal process of against others. The one which needs to go up is Reo's perjurous case against Hirum Reppert in which Reo was kicked out of the North Perry nuclear power plant and blacklisted from Lakeview Community College. The other Church web site is at http://whitenationalist.org/forum but because the forum software is over seven years old there are database problems.

11. Lindstedt published onto Church Website at http://christian-
identity.netlforunilshowthread.php? 1 639-Bryan-Reo-sFraudulent-amp-Perjurous-StalkingComplaint-against-Pastor-

Lindstedt-16CS000102> on January 12, 2016, at 9:48 p.m. that Plaintiff's petition for a civil stalking protection order against Lindstedt was "perjurious."

Admitted. Pretty much everything Bryan Reo writes in its never-ending vexatious and frivolous litigation and abuse of legal process against Pastor Lindstedt and the Church is perjurous.

12. Perjury is a crime in the State of Ohio. R.C. § 2921.11.

Admitted. Bryan Reo needs to stop but can't seem to help itself.

13. Lindstedt's statement that Plaintiff committed perjury is false.

Denied. As with the jurisdictional statement by Bryan Reo, Bryan Reo perjures itself endlessly.

14. Lindstedt published onto a publicly-accessible webpage on the World Wide Web at http://www.hateandflame.com/cgi-binlbbs62xlwebbbs config.pl?md=read;id=1 05524 on January 23, 2016, at 3:02 p.m. that Plaintiff should be killed by castration. Lindstedt also published on the same webpage Plaintiff's photograph. Plaintiff's residential address, and Plaintiffs phone number.

Denied. In case no one has noticed, Bryan Reo has just gone to a web page not belonging to Pastor Lindstedt's Church and made a claim that Pastor Lindstedt posted there something that in which Bryan Reo's perjurous stalking complaint was successful for Bryan Reo wasn't mentioned in the initial ex parte request. Which goes to show that it was likely Bryan Reo itself which posted these comments on a web page not under the ownership and control of Lindstedt's Church and then perjured himself even given a sworn affidavit by Pastor Lindstedt that Lindstedt hadn't posted even on the predecessor of the NIM-Buster forum since March 2012.

15. Lindstedt published onto a publicly-accessible webpage on the World Wide Web at http://www.hateandflame.comlcgi-binlbbs62x/webbbsconfig.pl?mdread;idl_08286 on

February 18, 2016, at 5:34 a.m., "BRYAN REO MUST DIE CASTRATE THE NIGGER LIPS FUCKER TIME TO KILL[.]" (Emphasis in original).

16. Lindstedt published onto a publicly-accessible webpage on the World Wide Web at <Error! Hyperlink reference not valid.> on

January 18, 2016, at 1:43 p.m., "Bryan Reo needs castrated. Kill that flicking Mamzer[.]"

Denied. Yet again Bryan Reo goes to a web page not under the ownership or control of Pastor Lindstedt and Lindstedt's Church and quotes things which it is likely that Bryan Reo posted on these forums itself.

17. Lindstedt published onto Church Website at http://christian-

identity.netlforumlshowthread.php? 1 639-Bryan-Reo-s-Fraudulent-amp-Perjurous-StalkingComplaint-against-Pastor-Lindstedt- I 6CS000 IO2&pI4O91 #postl 4091> on February 9, 2016, at 11:06 p.m. that Plaintiff engages in "ass-to-mouth" sex acts with Attorney Kyle Bristow ("Attorney"), a licensed Michigan and Ohio lawyer for whom Plaintiff performs legal research and document drafting assignments.

Admitted in part, denied in part. In contacting Attorney Kyle Bristow, Attorney Bristow admitted to a relationship with Bryan Reo. It is suspected that Attorney Bristow is a criminal associate and co-conspirator of Bryan Reo, in this case and in the dozens of other cases against other parties.

Reo items #17-28 in which Reo defines "catamite."

Denied. During the past seven years that Lindstedt has been fighting with Bryan Reo, Lindstedt has seen at least two instances in which Bryan Reo successfully blackmailed other mongrels into either leaving the bowel Movement or submitting to Reo's homosexual advances. One is "Victor Switzer" volunteer fireman of Pine Bluff Arkansas. The other is John Edward "Johnny Tonto" Britton of Emmett Idaho.. Both of these people are mongrels impersonating Aryan Christian Israelites. Both of them succumbed to Bryan Reo's blackmail of them wanting to pretend to be White in one way or another. Both of them, along with Bryan Reo, called Pastor Lindstedt a "convicted child molester." Both of them, along with Bryan Reo, have been called by Pastor Lindstedt "mongrel homosexuals" and/or more commonly "mamzer faggots."

Bryan Reo's case at the federal level involved Reo taking down Pastor Lindstedt's Church's web pages under color of the DMCA because Pastor Lindstedt found out Bryan Reo's racial ancestry and homosexuality and called Bryan Reo a "mamzer faggot" thousands of times since Oct. 2010 until now. Bryan Reo and the rest of the mongrel homosexuals / mamzer faggots

called Pastor Lindstedt a "convicted child molester" thousands of times. Bryan Reo and the rest of the mamzer faggots have the disadvantage of that in their wanting to pretend to be White Supremacists and Dual-Seedline Christian Identity pastors are indeed mongrels, and that Bryan Reo is a known homosexual and that they are suspected – rightfully or not -- of being blackmailed and of acceding to Reo's homosexual advances. Pastor Lindstedt has the advantages of actually being an Aryan Christian Israelite and not a homosexual or a child molester, much less a "convicted child molester" and being known as being an actual Dual-Seedline Christian Identity follower since running a militia unit from 1993 and being a Pastor of such a Church since 2006.

V. DELUSIONAL REO-CAUSES OF ACTION AND REO-"LAW"

Items subtitled/labeled from #1 to #7, paragraphs numbered from #29 to #83 across pages five through eleven are nothing more than Bryan Reo's delusions and lies as to what Bryan Reo thinks that the law should be. There is no real Cause of Action. Nothing stating a claim upon which relief should be granted. No real facts put into evidence.

However, if there is anything within this dishonest perjurous flatulence by Bryan Reo, Pastor Lindstedt and Lindstedt's Church denies such.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that this Court will award Plaintiff against Defendants, jointly and severally, a money judgment in the amount of exactly fifteen thousand dollars (\$15,000.00)— which is inclusive of special, general, exemplary, and punitive damages and costs—, statutory interest on any money judgment entered by the Court in Plaintiffs favor, and that the Court will refer the case to the Lake County Prosecutor's Office and/or the Federal Bureau of Investigation for criminal prosecution of Lindstedt and/or Fausnaught if the Court determines that Lindstedt and/or Fausnaught engaged in criminal acts against Plaintiff.

Early this morning, while googling the name of Bryan Reo, this item from the Channel 5 TV news out of Cleveland popped up on the front page, other than the items from Pastor Lindstedt's Church web pages:

http://www.newsnet5.com/news/local-news/investigations/perry-nuclear-generating-station-under-intense-scrutiny-by-federal-regulators-probing-safety-issues

Perry Nuclear Generating Station under intense scrutiny by federal regulators probing safety issues

Pastor Lindstedt's Church web page:

http://christian-identity.net/forum/showthread.php?p=14500#post14500

All of a sudden the Bryan Reo vs Hiram Reppert, 13CV002707 case made perfect sense: Bryan Reo did something stupid or criminal while working at the North Perry nuclear power plant and got fired, and then a Google search revealed that since Oct. 2010 Pastor Lindstedt's Church's web page revealed that Bryan Reo was a self-loathing homosexual mongrel without a conscience or remorse and that the nuclear power plant had hired Bryan Reo without even doing a web search on Bryan Reo's name. Therefore, it is only by the grace of YHWH that Bryan Reo didn't cause a nuclear meltdown which might have killed between 20 to 100 million people and destroyed the Great Lakes region of the U.S. and Canada.

There is no jury which is going to find liable for saving their lives by blowing the whistle on Bryan Reo Pastor Lindstedt or Pastor Lindstedt's Church web sites. The Lake County judges like Magistrates Roll, Foster, and Judges Collins and Culotta are finished permanently.

Does this Mentor Municipal Court want to destroy itself too?

Wherefore this Court should summarily rule in favor of Roxie Fausnaught to penalize Bryan Reo for \$15,000 for abuse of legal process. Pastor Lindstedt and Pastor Lindstedt's Church wish for Bryan Reo and Reo co-conspirators. The Lake County Prosecuting Attorney,

the Ohio Attorney General's Office and the FBI should be notified as well to proceed with criminal action against Bryan Reo and Bryan Reo's father and all the Bryan Reo co-conspirators.

Hail Victory !!!

Pastor Martin Lindstedt

The Church of Jesus Christ Christian / Aryan Nations of Missouri

338 Rabbit Track Road, Granby Missouri 64844

(Tel #) 417-472-6901

Certificate of Service:

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the Roston CJCC/AND

I, Pastor Lindstedt, posted a copy of the above posted on Lindstedt's Church web forum as of 30 April, 2016 at below thread:

http://christian-identity.net/forum/showthread.php?1665-Ol-Niggerlips-v.-Pastor-Lindstedt-Aryan-Nations-amp-Roxie-Before-the-Mentor-Municipal-Kort-CVE-1600245 http://christian-identity.net/forum/showthread.php?1665

And a true and genuine copy of this motion/brief/filing has been dispatched by United States mail, postage prepaid on 30 April 2016 to the Plaintiff at:

Bryan Reo (& Anthony D. Reo, Bryan Reo's Father / Co-conspirator)

7143 Rippling Brook Lane,

Mentor Ohio 44060

Pastor Martin Lindstedt