

STATE OF OHIO
IN THE MENTOR MUNICIPAL COURT
CIVIL DIVISION

BRYAN ANTHONY REO
7143 Rippling Brook Ln.
Mentor, OH 44060

Plaintiff,

v.

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

c/o Roxie Fausnaught
338 Rabbit Track Rd.
Granby, MO 64844

and

MARTIN LINDSTEDT
338 Rabbit Track Rd.
Granby, MO 64844

and

ROXIE FAUSNAUGHT
338 Rabbit Track Rd.
Granby, MO 64844

Defendants.

Case No. 16 CVE 245

Hon.

FILED & JOURNALIZED
2016 MAR 22 A 11:44
MENTOR MUNICIPAL COURT

PLAINTIFF'S COMPLAINT
(JURY DEMAND ENDORSED HERON)

NOW COMES Bryan Anthony Reo ("Plaintiff"), *pro se*, and hereby propounds upon The Church of Jesus Christ Christian/Aryan Nations of Missouri ("Church"), Martin Lindstedt

(“Lindstedt”), Roxie Fausnaught (“Fausnaught”) (collectively “Defendants”), and this Honorable Court Plaintiff’s Complaint:

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).

II. PARTIES

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

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.

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.

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. STATEMENT OF 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).

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

11. Lindstedt published onto Church Website at <<http://christian-identity.net/forum/showthread.php?1639-Bryan-Reo-s-Fraudulent-amp-Perjurous-Stalking-Complaint-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.”

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

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

14. Lindstedt published onto a publicly-accessible webpage on the World Wide Web at <http://www.hateandflame.com/cgi-bin/bbs62x/webbbs_config.pl?md=read;id=105524> 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 Plaintiff’s phone number.

15. Lindstedt published onto a publicly-accessible webpage on the World Wide Web at <http://www.hateandflame.com/cgi-bin/bbs62x/webbbs_config.pl?md=read;id=108286> 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 <http://www.hateandflame.com/cgi-bin/bbs62x/webbbs_config.pl?md=read;id=104595> on January 18, 2016, at 1:43 p.m., “Bryan Reo needs castrated. Kill that fucking Mamzer[.]”

17. Lindstedt published onto Church Website at <<http://christian-identity.net/forum/showthread.php?1639-Bryan-Reo-s-Fraudulent-amp-Perjurous-Stalking-Complaint-against-Pastor-Lindstedt-16CS000102&p=14091#post14091>> 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.

18. It is inherently injurious to Plaintiff’s professional reputation for Lindstedt to publish to third-parties that Plaintiff engages in “ass-to-mouth” sex acts with Attorney.

19. Lindstedt’s statement that Plaintiff engages in “ass-to-mouth” sex acts with Attorney is false.

20. Lindstedt published onto Church Website at <<http://christian-identity.net/forum/showthread.php?1643-Reo-Bryan-Anthony-vs.-Callvation-LLC-Case-16CV000331>> on February 23, 2016, at 10:27 p.m. that Plaintiff is a “catamite.”

21. The *Merriam-Webster Online Dictionary* defines “catamite” as “a boy kept by a pederast.” *Merriam-Webster Online Dictionary*. <<http://www.merriam-webster.com/dictionary/catamite>>. Accessed 20 March 2016.

22. Upon information and belief, a catamite plays the subservient and feminine roll in homosexual sex acts.

23. It is inherently injurious to Plaintiff's professional reputation for Lindstedt to publish to third-parties that Plaintiff is a catamite.

24. Lindstedt's statement that Plaintiff is a catamite is false.

25. Lindstedt published onto a publicly-accessible webpage on the World Wide Web at <<https://www.youtube.com/watch?v=X4mqgt4MoOQ>> a video in which Lindstedt refers to Attorney as "Bryan Reo's 'butt-buddy.'" "

26. Upon information and belief, "butt-buddy" is synonymous with catamite.

27. It is inherently injurious to Plaintiff's professional reputation for Lindstedt to publish to third-parties that Plaintiff acts as a "butt-buddy" of Attorney.

28. Lindstedt's statement that Plaintiff is a "butt-buddy" of Attorney is false.

V. CAUSES OF ACTION

1. COMMON LAW LIBEL PER SE AGAINST LINDSTEDT AND CHURCH

29. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

30. Lindstedt and Church published false statements of fact about Plaintiff to third-parties via the medium of the World Wide Web.

31. The false statements of fact published by Lindstedt and Church about Plaintiff were published negligently.

32. The false statements of fact published by Lindstedt and Church about Plaintiff were published by Lindstedt and Church without privilege.

33. The false statements of fact published by Lindstedt and Church about Plaintiff impugn Plaintiff's professional character or standing and/or reflects upon the character of Plaintiff by bringing him into ridicule, hatred, or contempt, and/or state or implies that Plaintiff has

committed a crime of moral turpitude. *Becker v. Toulmin*, 165 Ohio St. 549, 138 N.E.2d 391 (Ohio 1956).

34. Due directly and proximately to Lindstedt and Church publishing false statements of fact about Plaintiff, Plaintiff has suffered injury to his reputation and has caused Plaintiff to suffer mental anguish in the form of vexation, irritation, anxiety, frustration, and hatred.

35. Lindstedt and Church are jointly and severally liable to Plaintiff for common law libel per se.

2. COMMON LAW INVASION OF PRIVACY – FALSE LIGHT – AGAINST LINDSTEDT AND CHURCH

36. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

37. Lindstedt and Church published false statements of fact about Plaintiff to third-parties via the medium of the World Wide Web, thereby giving publicity to what Lindstedt and Church stated about Plaintiff.

38. The false statements of fact about Plaintiff published by Lindstedt and Church placed Plaintiff before the public in a false light.

39. The false statements of fact about Plaintiff published by Lindstedt and Church are highly offensive to a reasonable person.

40. Lindstedt and Church are at fault and/or knew or were reckless as to the falsehood of the statements Lindstedt and Church published about Plaintiff.

41. Due directly and proximately to Lindstedt and Church publishing false statements of fact about Plaintiff, Plaintiff has suffered injury to his reputation and has caused Plaintiff to suffer mental anguish in the form of vexation, irritation, anxiety, frustration, and hatred.

42. Lindstedt and Church are jointly and severally liable to Plaintiff for common law invasion of privacy – false light.

**3. COMMON LAW INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
AGAINST LINDSTEDT AND CHURCH**

43. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

44. By and through publishing false statements of fact about Plaintiff to third-parties via the medium of the World Wide Web, Lindstedt and Church engaged in extreme and outrageous conduct.

45. Lindstedt and Church acted with an intentional or reckless *scienter* when Lindstedt and Church published false statements of fact about Plaintiff.

46. Due directly and proximately to Lindstedt and Church publishing false statements of fact about Plaintiff, Plaintiff has suffered severe emotional distress in the form of vexation, irritation, anxiety, frustration, and hatred.

47. Lindstedt and Church are jointly and severally liable to Plaintiff for common law intentional infliction of emotional distress.

**4. STATUTORY CRIMINAL LIABILITY AGAINST LINDSTEDT AND
FAUSNAUGHT**

48. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

49. It constitutes a criminal act in the State of Ohio to solicit someone to commit a criminal offense. R.C. § 2923.03(A)(1).

50. It constitutes a criminal act in the State of Ohio to purposefully cause the death of another. R.C. § 2903.02(A).

51. By and through Lindstedt's published statements onto the World Wide Web, Lindstedt committed against Plaintiff the crime of solicitation to murder.

52. It constitutes a criminal act in the State of Ohio to engage in a pattern of conduct that is knowingly designed to cause another person to believe that the offender will cause physical harm or mental distress to the other person. R.C. § 2903.211(A)(1).

53. It constitutes a criminal act in the State of Ohio for a person to use a computer to post a message with the purpose of urging or inciting another to commit an act that will cause physical harm or mental distress to another person. R.C. § 2903.211(A)(2).

54. By and through Lindstedt's published statements onto the World Wide Web, Lindstedt committed against Plaintiff the crime of menacing by stalking.

55. It constitutes a criminal act in the State of Ohio to use a telecommunications device to abuse, threaten, or harass another person. R.C. § 2917.21(B).

56. Content posted onto the World Wide Web constitute "telecommunications" as that term is defined by R.C. §§ 2913.01(X) and 2917.21(E)(3).

57. By and through Lindstedt's published statements onto the World Wide Web soliciting the murder and/or castration of Plaintiff, Lindstedt committed against Plaintiff the crime of telecommunications harassment. R.C. § 2917.21(C)(1).

58. It constitutes a criminal act in the State of Ohio to actively participate in a criminal gang, with knowledge that the criminal gang engages in a pattern of criminal gang activity, to purposefully promote, further, or assist any criminal conduct. R.C. § 2923.42(A).

59. Church is a "criminal gang" as that term is defined by R.C. § 2923.41(A) which engages in a "pattern of criminal gang activity" as that term is defined by R.C. § 2923.41(B)(1).

60. Fausnaught actively participates in Church by serving as a director and as its registered agent.

61. Upon information and belief Fausnaught has actual knowledge that Church engages in a pattern of criminal gang activity.

62. Upon information and belief, Fausnaught furthers Church's criminal activities by serving as a director and as its registered agent.

63. Lindstedt actively participates in Church by serving as a director, by publishing materials onto Church Website, and by controlling Church's finances.

64. Lindstedt has actual knowledge that Church engages in a pattern of criminal gang activity.

65. Lindsedt furthers Church's criminal activities by serving as a director and by publishing materials onto Church Website and by controlling Church's finances.

66. Lindstedt and Fausnaught victimized Plaintiff by and through Lindstedt's and Fausnaught's criminal gang.

67. Due directly and proximately to Lindstedt and Fausnaught committing crimes against Plaintiff, Plaintiff has suffered injury to his reputation and has caused Plaintiff to suffer mental anguish in the form of vexation, irritation, anxiety, frustration, and hatred.

68. Lindstedt and Fausnaught are jointly and severally liable to Plaintiff for engaging in criminal acts. R.C. § 2307.60.

5. COMMON LAW CIVIL CONSPIRACY AGAINST DEFENDANTS

69. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

70. Defendants are two or more legal entities.

71. Defendants acted in a concerted action to tortiously injure Plaintiff.

72. The actions engaged in by Defendants against Plaintiff were committed for an unlawful purpose.

73. Due directly and proximately to Defendants engaging in a civil conspiracy to cause tortious injury to Plaintiff, Plaintiff has suffered injury to his reputation and has caused Plaintiff to suffer mental anguish in the form of vexation, irritation, anxiety, frustration, and hatred.

74. Defendants are jointly and severally liable to Plaintiff for common law civil conspiracy.

6. PUNITIVE DAMAGES AGAINST DEFENDANTS

75. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

76. The actions or omissions of Defendants against Plaintiff were consciously, deliberately, and intentionally committed with actual malice.

77. Defendants are jointly and severally liable to Plaintiff for punitive damages. R.C. § 2315.21.

7. PIERCE THE CORPORATE VEIL OF CHURCH

78. Plaintiff incorporates by reference the allegations contained in the foregoing Paragraphs of this Complaint as if each were fully set forth herein.

79. Lindstedt and Fausnaught exercise complete control over Church to such an extent that Church has no separate mind, will, or existence of its own.

80. Lindstedt and Fausnaught control and utilize Church in such a manner so as to commit illegal acts against Plaintiff.

81. Due directly and proximately to Lindstedt and Fausnaught using Church to tortiously injure Plaintiff, Plaintiff has suffered injury.

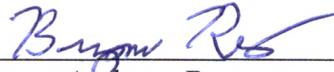
82. It is unjust for Lindstedt and Fausnaught to hide behind the corporate veil of Church to avoid liability to Plaintiff.

83. The corporate veil of Church should be pierced so that its owners and employees will be jointly and severally liable for any money judgment rendered against Church in the instant civil action. *Dombroski v. WellPoint, Inc.*, 119 Ohio St.3d 506, 2008-Ohio-4827.

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 Plaintiff's 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.

Respectfully submitted,



Bryan Anthony Reo
7143 Rippling Brook Ln.
Mentor, OH 44060
(P): (440) 313-5893
(E): roodeplaat1983@gmail.com
Plaintiff

Dated: March 21, 2016

JURY DEMAND

Plaintiff hereby demands a trial by jury on all triable issues of fact. Civ.R. 38.

Respectfully submitted,



Bryan Anthony Reo
7143 Rippling Brook Ln.
Mentor, OH 44060
(P): (440) 313-5893
(E): roodeplaat1983@gmail.com
Plaintiff

Dated:

March

21,

2016