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

ANTHONY DOMENIC REO,

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

[Fake] Plaintiff,

Hon. John R. Adams.

٧.

Magistrate Carmen E. Henderson

1:42 pm Jul 10 2020 **Clerk U.S. District Court Northern District of Ohio** 

Cleveland

MARTIN LINDSTEDT,

Defendant.

REO LAW, LLC

Bryan Anthony Reo (#0097470)

P.O. Box 5100

Mentor, OH 44061

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Pro se Defendant

DEFENDANT'S REPLY BRIEF TO PLAINTIFF BRYAN REO'S FRIVOLOUS AND UNLAWFUL MOTION FOR SUMMARY JUDGMENT (Doc 18) with COUNTER-MOTION FOR SUMMARY JUDGMENT AGAINST PRETEND PLAINTIFF ANTHONY DOMENIC REO & REAL PROFESSIONAL PLAINTIFF BRYAN REO

NOW COMES Pastor Martin Lindstedt ("Plaintiff"), pro se, and hereby propounds upon the fake Plaintiff Anthony Domenic Reo and the actual Plaintiff Attorney Bryan Reo Plaintiff this timely filed Reply Brief to Bryan Reo's frivolous and vexatious Motion for Summary Judgment given that Bryan Reo hasn't fulfilled and has no intention of actually doing its necessary Fed. R. Civ. Procedure Rule 26 (1)(A)(iii) Initial Disclosures Computation of Damages or even the perjurous and fantastic statements made in Reos' original bogus civil complaint about tales of homosexual incest. All Pastor Lindstedt did was to assume that the mongrel sitting next to Bryan Reo while Bryan Reo's Brazilian Sephardic jewess wife – or so it looked like to Pastor Lindstedt – jumped up and down at the Lake County Courthouse on the afternoon of 25 June 2019 trying to get the attention of what Pastor Lindstedt thought were two homosexual mongrels. It wasn't until Bryan Reo filed four more defamation cases in Lake County – since transferred to the federal court by Pastor Lindstedt – that Pastor Lindstedt, who never referred to Bryan Reo's father by name but rather as "O!' Niggerlips' Alleged Spawner" – figured out that what Pastor Lindstedt had thought was one of Bryan Reo's mongrel homosexual lovers was regrettably not a homosexual. (Otherwise Pastor Lindstedt and Pastor Lindstedt's Church of Jesus Christ Christian / Aryan Nations of Missouri (henceforth "the Church") and the White Supremacist and Christian Identity racial Resistance would have been spared having to deal with the antifa federal agent provocateur litigation trickster running the Foundation for the MarketPlace of Ideas (FMI) / ZOGbot Poverty [F]Law Center (ZPLC) delusional homosexual mongrel known as Bryan Reo which has been infesting the Movement(s) for 20 years and fighting with Pastor Lindstedt for over a decade and "lawfaring" Pastor Lindstedt and Lindstedt's Church and Lindstedt's woman and Lindstedt's sister since early April 2014.

Bryan Reo is on the record (as a public figure within White Supremacy, FMI Director of Public Research, Doc 16-2 2017 IRS 501(c)(3) pg. 166-169) and having known malice against Pastor Lindstedt and evidenced a criminal intent to use "lawfare" against Pastor OLindstedt to use the courts to render Pastor Lindstedt desolate and penniless and to steal Lindstedt's inheritance since 25 August 2014 post on William Finck's Christogenea Forum (Pray for My Success, Doc 16-3. Pgs 170-172) as wanting to prevent Pastor Lindstedt from having his Rule 26 discovery by along with FMI Executive Director and suspected Aryan homosexual lover Attorney Kyle Bristow from questioning the alleged fake Plaintiff Anthony D. Reo. See Pastor Lindstedt's Report of the Planning Meeting which Bryan Reo refused to call in and hold because

it meant that the actual alleged Plaintiff Anthony Reo would have to make an appearance and speak at least something. Indeed, Bryan Reo admits that there will be no depositions other than with making Pastor Lindstedt conduct them before a judge, Bryan Reo says that he will provide no paper discovery and only make objections to this discovery, and . . . If we are not able to resolve disputes (and after over six years of "lawfare" from Bryan Reo this always means that Reo will claim to have "won" and will not provide Rule 26 initial disclosures and do anything other than lie and evade further discovery) I will seek a protective order and sanctions." See Doc 16-1 Exhibit #7, Page 165 filed 27 April 2020.

There are the four current Bryan Reo v. Lindstedt federal lawsuits in the Northern District of Ohio:

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

Bryan Anthony Reo v. Martin Lindstedt 1:19-cv-02589-CAB

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

Stefani Rossi Reo v. Martin Lindstedt 1:19-cv-02786-CAB

In each of them Bryan Reo refuses to render the Rule 26 initial disclosures, especially as to how it has been damaged in any way, writes up pages and pages of discovery / admissions over what Pastor Lindstedt published openly on Pastor Lindstedt's Church's web pages over the past decade about public figure Bryan Reo and Reo's lawyer friends of the FMI/ZPLC, (but in this case there is nothing other than when Pastor Lindstedt mistook Bryan Reo's father for one of Bryan Reo's homosexual mongrel lovers.) In Bryan Reo's Requests for Admissions, Interrogatories, and Production of Documents, Doc 18-1 there is literally nothing there other than Reo-talk about largely invented Bryan Reo accusations from the civil complaint all of which Pastor Lindstedt has denied in his Answer & Counter-Complaint. Bryan Reo has an obligation

under Rule 26 Initial Disclosures to prove Bryan Reo's claims that Pastor Lindstedt said anything about Anthony Domenic Reo engaging in homosexual incest with his son Bryan Reo and how \$500,000 in actual and punitive damages have been accrued. Also Bryan Reo makes like Attorney Kyle Bristow does as well – demands for a permanent "gag order" against Pastor Lindstedt and Lindstedt's Church to refrain from publishing (what very little is there on Anthony Domenic Reo) the past decade's work about public figure Bryan Reo. Thus this litigation is really just a fraudulent case in which Anthony domenic Reo is used as a fake client for Bryan Reo and Reo's antifa fake White Supremacist lawfare false-flag operation FMI/ZPLC. There is actually no discovery to be had other than what is publicly available to be seen on Pastor Lindstedt's Church's web page about how Pastor Lindstedt thought that some unknown mongrel that turned out to be Anthony Reo was one of Bryan Reo's homosexual lovers. Pastor Lindstedt denies harming alleged Plaintiff Anthony D. Reo, has never spoken or written to Anthony D. Reo, and wants nothing to do with the Alleged Plaintiff, who is being used as a fake plaintiff by Bryan Reo. This case should be summarily dismissed and Anthony D. Reo assessed \$250,000 in general damages and \$250,000 in punative damages for participating in this fraudulent effort to defraud through legal process Pastor Lindstedt and to censor Lindstedt's Church.

At this time in late April 2020 Bryan Reo had sought an ex parte order disallowing Pastor Lindstedt access to discovery for Reo's wife Stefani Rossi Reo in *Stefani Rossi Reo v. Martin Lindstedt* 1:19-cv-02786-CAB. The magistrate judge told Bryan Reo that no *ex parte* Motions would be entertained on 30 March 2020. So Bryan Reo went out to Lake County Court and initiated a Civil Stalking Protection Order (CPSO) on March 30, 2020 on behalf of himself and for alleged Plaintiff Anthony Domenic Reo. Even the pretense of one being necessary for alleged Plaintiff was so far-fetched that it was denied but Bryan Reo got one temporarily for himself on April 6, 2020 without Pastor Lindstedt knowing about it. Pastor Lindstedt asked to respond via telephone because Pastor Lindstedt is

without funds and Roxie Fausnaught has cancer and Pastor Lindstedt is her caregiver but the Magistrate Judge Christian Andre refused. However upon the hearing to make it permanent this Magistrate Judge found out Bryan Reo was lying to him and made the judgment to deny Reo's CSPO which Reo had been using to threaten Pastor Lindstedt in these federal cases, including this one. See Exhibit #1 Judgment Entry Adopting Magistrate's Opinion Bryan Anthony Reo v. Martin Lindstedt Case No 20CS000502. In it the judge notes that "The petitioner provided the respondent with this same bad legal advice, thereby subjecting the latter to arrest at the former's whim if reported." Bryan Reo has for the past decade made false accusations to the federal and state police agencies and to the state and federal courts trying to get Pastor Lindstedt or Lindstedt's friends killed or jailed or impoverished. All Pastor Lindstedt has been able to do is to answer as best Lindstedt can and publish it on Lindstedt's Church's web pages and rely of YHWH to protect YHWH's Servant serving YHWH's Servant Nation. The magistrate judge Andre states the obvious: Bryan Reo's legal opinion is less than worthless and is made only for purpose of deceit.

Bryan Reo in addition to violating Rule 26 governing having to show a computation of damages in initial disclosures, has violated this Court's Local Rule 37.1. — Discovery Disputes. Bryan Reo has not made any effort to contact Pastor Lindstedt regarding his "admissions" but rather filed its sundry Motions for Summary Judgment just like from 2014-2020 before the deferral and Lake County Courts while refusing to provide the Rule 26 Initial Disclosures. Bryan Reo is suing over what has been posted on Pastor Lindstedt's Church's web page for years — there is really nothing new to discover from Pastor Lindstedt. In fact, Bryan Reo is suing for a "gag order" permanent injunction contrary to the US Supreme Court rulings since 1931 in *Near v. Minnesota* 283 U.S. 697. This demand for a "gag order" is in fact a demand for the destruction of evidence of Bryan Reo misconduct and this evidence is genuine material fact. Nor should there be any dispute. If Bryan Reo really wants yet another thread on Pastor Lindstedt's Church's web page summarizing how Bryan Reo is a delusional homosexual mongrel agent

provocateur that thinks it is heterosexual Aryan Christian Israelite working for to advance the First Amendment rights of those White Supremacists and Christian Identity figures (other than Pastor Lindstedt and Lindstedt's particular Aryan Nations Church) then that could be arranged without even a telephone conference under L.R. 37.1. However, according to law Bryan Reo has to actually try to work with Pastor Lindstedt to gain discovery — not that there is any — as opposed to filing its little word games while telling Pastor Lindstedt that he wasn't going to let alleged Plaintiff Anthony Domenic Reo admit that this litigation was always just a ruse to steal Pastor Lindstedt's inheritance.

Now that Pastor Lindstedt is no longer under the threat of having Bryan Reo report a "Civil protective stalking order" if Lindstedt answers in a manner not pleasing to Bryan Reo then discovery can proceed without further misconduct by Bryan Reo. The Alleged Plaintiff can speak for himself as well.

For the fifth or sixth time Pastor Lindstedt denies everything that Bryan Reo wants Pastor Lindstedt to admit other than that Pastor Lindstedt thinks Bryan Reo is a delusional homosexual mongrel working as a ZOGbot, which Pastor Lindstedt admits to for the thousandth or so time.

For a successful Fed.R.Civ.Proc Rule 56 Motion for Summary Judgment to prevail Bryan Reo must conclusively demonstrate that there are no genuine material facts that Pastor Lindstedt can muster in his defense. The facts are that Bryan Reo is a limited-purpose public figure within the White Supremacist and/or Christian Identity Movement, that Bryan Reo isn't remotely White, much less Aryan, that Bryan Reo has nevertheless involved itself in such a Movement's public affairs, that Bryan Reo has admitted to being an informant for the federal government and other matters discussed by Pastor Lindstedt. That if Bryan Reo had left the Movement as it promised when its identity was detected by Pastor around Halloween 2010 and gone on to do

whatever it does as a homosexual mongrel and left Pastor Lindstedt in peace then it wouldn't be discussed or commented upon as a result of this frivolous and malicious litigation. Bryan Reo and certainly not Pretend Plaintiff Anthony D. Reo has no real damages because Pastor Lindstedt told the truth about it. However Pastor Lindstedt and Pastor Lindstedt's Church have suffered real monetary damages as a result of Bryan Reo barratry and frivolous litigation as a result of Bryan Reo running amok in the Ohio and federal courts. Wherefore if anyone should gain a Summary Judgment it is Pastor Lindstedt.

Local Rule 7.1 (i) provides for Sanctions for filing frivolous motions. Bryan Reo's Motion for Summary Judgment is a frivolous motion in that there is genuine material fact that Bryan Reo filed this lawsuit in Lake County court along with its wife and father in order to steal Pastor Lindstedt's South Dakota inheritance via these frivolous lawsuits. Bryan Reo has refused to provide the mandated F.R.Civ.P Rule 26 (1)(iii) Initial Disclosures Computation of Damages or to obey Local Rule 37.1 mandating a sincere good faith effort to Defendant to resolve any genuine discovery dispute in which Defendant has already denied that public figure Bryan Reo has suffered any real damages many times over. Rather, Bryan Reo has merely drafted up a harangue and called it yet again a "request for admissions" the like of which has been done before in all the Bryan Reo cases since 2014. Pastor Lindstedt's answers have not changed at all for the past decade. Pastor Lindstedt has no new or different "admissions".

Wherefore, Pastor Lindstedt requests that Bryan Reo's frivolous Motion for Summary Judgment (Doc #34) be denied by this Court, that this Court instead issue a Summary Judgment on behalf of Pastor Lindstedt for the exact same amount frivolously demanded by Bryan Reo against Pastor Lindstedt as a sanction, and that Bryan Reo be disbarred as an officer of this Court for filing along with its wife and father these frivolous lawsuits against an old enemy Pastor

Lindstedt for Lindstedt's never-ending work to keep White Supremacy pure Aryan White Christian Israelite and free of delusional homosexual Satanic mongrel abominations & ZOGbots.

By the way, Pastor Lindstedt seeks to amend his civil complaint before the 12 August 2020 deadline and to joinder the Bryan Reo co-conspirator counter-defendants and will seek discovery from them as this case progresses.

Tilted Pesto CJCCIAN

Hail Victory !!!

/S/. Pastor Martin Lindstedt Defendant/Counter-Claimant

Pastor, Church of Jesus Christ Christian/Aryan Nations of Missouri

338 Rabbit Track Road Granby Missouri 64844

(P): (417) 472-6901, (E): pastorlindstedt@gmail.com

Pro se Defendant

Dated: 8 July 2020

Exhibit #1: Judgment Entry Adopting Lake County Ohio Magistrate's Opinion Bryan Anthony Reo v.

Martin Lindstedt Case No 20CS000502

## **Certificate of Service**

I, Pastor Martin Lindstedt do hereby certify that a true and genuine copy of the foregoing was mailed via U.S. Mail on 8 July 2020 to this U.S. District Court:

Plaintiff Anthony Domenic Reo and Stefani Rossie Reo and Attorney Bryan Reo living at 7143 Rippling Brook Lane, P.O. Box 5100, Mentor Ohio 44061 were mailed a copy of the foregoing via reo@reolaw.org

The following were duly e-mailed as Pastor Lindstedt and Lindstedt's Church is short of funds and Pastor Lindstedt intends to joinder them before the deadline in August:

Ohio Assistant Attorneys General – Constitutional Offices Section Michael Walton (00922010) Michael.walton@ohioattorneygeneral.gov Halli Watson (0082466) halli.watson@ohioattorneygeneral.gov 30 East Broad Street, 16<sup>th</sup> Floor Columbus, Ohio 43215

Attorney Kyle Bristow of the FMI/ZPLC P.O. Box 46209. Mt. Clemens, Michigan 48046 "BristowLaw@gmail.com"

A copy of the foregoing was e-mailed to Attorneys Lisa Zaring (<u>Lzaring@mojolaw.com</u>) and Lindsey Upton (<u>Lupton@mojolaw.com</u>) upon scanning in as there is an agreement to save postage so using e-mail to do so.

A copy of the foregoing was sent to Attorney Brett Klimkowsky (<u>Brett1066@gmail.com</u>) of the FMI/ZPLC White Supremacist lawfare group presently in hiding and evading service.

Robert Konrad, Schrieber Law Firm, 1110 East Souix Ave., Pierre South Dakota 57501 Bryan Reo's lawyer trying to force Pastor Lindstedt to take back his inheritance given to his sister rob@xtremejustice.com

A copy of the foregoing appears on the following Aryan Nations Christian Nationalist forum:

http://www.whitenationalist.org/forum/showthread.php?2202

