

**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

**DECLARATION OF COUNSEL BRYAN ANTHONY REO
REGARDING EXPERTS**

The following is a Declaration of Bryan Anthony Reo, Counsel for Plaintiff in the instant action.

1. My name is Bryan Anthony Reo. I am an attorney duly admitted to practice in both the State of Ohio and the State of Michigan. I am over 18 years of age. I am competent to testify and would do so if called upon. I make this declaration on personal knowledge and in my capacity as an officer of this Court and as Counsel to Plaintiff in the instant action, under penalty of perjury.

2. I initiated the instant action in Lake County Court of Common Pleas in Lake County Ohio on behalf of my client, Plaintiff Anthony Domenic Reo, whereafter Defendant removed the case to the United States District Court for the Northern District of Ohio.

3. On 11/30/2020 Judge Oliver in 1:19-cv-2103 held a conference setting at timeline and procedure for expert reports, specifically clinical psychologists I as plaintiff in pro se was attempting to retain for purposes of a report and testimony as to my emotional damages, mental anguish, pain and suffering in that case.

4. On or about 10/29/2020 I called Dr. Christopher Amato (Ph.D) a clinical psychologist in Beachwood. I had a detailed conversation with Dr. Amato lasting approximately 15 minutes. Dr. Amato listened to the nature of what Defendant was doing and how Defendant was also cyber-stalking and defaming my relatives, friends, business contacts, affiliates, lawyers whom I had hired over the years, and Dr. Amato flatly said, "I cannot have you as a patient and I cannot get involved in this in any way because I cannot have him doing to me and my practice what he is doing to you and your practice. I cannot be involved in anything remotely related to Mr. Lindstedt." This was a professional that I had been referred to by a personal injury attorney who stated that Dr. Amato regularly provided expert testimony in his personal injury/negligence tort cases. In this instance Dr. Amato explicitly said he would not have me as a patient and would not be a testifying expert in any proceeding if the proceeding involved Martin Lindstedt.

5. On 10/30/2020 I had an exchange of emails with Premier Behavioral Health Services of Mentor, specifically with Aimee Moffat officer manager on behalf of the Clinical Director. This agency likewise declined not only to be a testifying expert but to have me as a patient.

6. Throughout November and December I contacted several other healthcare professionals in the area of clinical psychology and was likewise unable to find any willing to serve as an expert witness in a proceeding involving Martin Lindstedt.

7. The same experts who refused to represent Plaintiff Bryan Anthony Reo from the 1:19-cv-2103 case which involves Martin Lindstedt are certainly going to refuse in the instant action

or in any case involving a Reo vs Martin Lindstedt. The same roadblocks will be encountered. It is unlikely Plaintiff Anthony Domenic Reo will be able to find a testifying expert in the field of clinical psychology, especially once the experts know the extent of what is being done by Defendant.

8. Martin Lindstedt has embarked upon a pattern of conduct of harassment of Plaintiff's Counsel's affiliates, friends, relatives, an attorney in Genoa who previously represented Plaintiff [Brett Klimkowsky], an attorney in Michigan for whom Plaintiff's Counsel used to clerk [Kyle Bristow], an attorney in South Dakota who is representing Plaintiff's Counsel in a proceeding there [Robert Konrad], and has openly stated that he attempts to find and contact opposing counsel of record in Plaintiff's Counsel's Reo Law cases for clients of Counsel's law practice [See Exhibit 1]. Defendant posts on his website what he purports are email exchanges with owners of call centers from Telephone Consumer Protection Act cases involving Counsel and Defendant posts articles involving client cases from of Reo Law cases [See Exhibit 2], sometimes with commentary as to the clients of Reo Law.

9. Defendant's website has an account named "Bryan Reo" which is not an account owned or operated by Counsel but rather is an account that was created by Defendant and is owned and operated by Defendant. The account signature block states, in pertinent part, "Under NO Circumstances is anyone who hears my voice to harm or molest or have anything to do with Bryan Reo or anyone who will have anything to do with Bryan Reo. **Stay away from Bryan Reo.**" [emphasis added] [See Exhibit 3]

10. It appears to be Defendant's goal to cause social isolation and alienation of Counsel such that no individuals or professionals will be willing to have a personal or professional relationship with Counsel. In short, not only is Defendant defaming and damaging Plaintiff's reputation, but

Defendant is undertaking action by stalking and harassing those closest to Plaintiff and his Counsel, to make it risky for people to associate with Plaintiff or his Counsel because they risk coming to the attention of Defendant and winding up being defamed and cyber-stalked themselves. Defendant tells people to “stay away from Bryan Reo” and the content of his website makes it clear that if they dare get involved with Bryan Reo that Defendant will try to ruin them and damage them the way he tries to damage Plaintiff and Plaintiff’s Counsel.

11. Plaintiff is going to be greatly hindered and prejudiced in putting on a damages hearing in regards to a Defendant who not only did not produce anything in discovery that would show his malice, state of mind, magnitude of dissemination, motivation, but who also has embarked on a course of action that makes it extremely difficult for Plaintiff to be able to elicit testimony from third parties such as experts in clinical psychology because such experts have thus far refused to testify in any proceeding in the instant action. Any expert who was initially considering representing Counsel in his case against Martin Lindstedt 1:19-cv-2103, immediately refused after examining the situation and realizing that Defendant is making accounts on his websites in the names of individuals such as Brett Klimkowsky [Ohio attorney who formerly represented Counsel in several matters], Kyle Bristow [Ohio and Michigan attorney for whom Counsel clerked during law school], Robert Konrad [South Dakota attorney representing Counsel in a proceeding in that state] and to agree to testify as an expert at a proceeding involving Martin Lindstedt is to resign oneself to having an account made in his name by Martin Lindstedt and having highly defamatory content created on his website. In short, Defendant Martin Lindstedt’s website implicitly threatens anybody who would dare consider giving testimony on behalf of Plaintiff with a very clear message, “look at all of the accounts I have made in the names of people who have been linked to Bryan Reo in a personal or professional capacity. If you get

involved in anything on behalf of Bryan Reo or his clients, I will damage you the way I have damaged him and damaged the others.” Under these circumstances and conditions Plaintiff cannot find any expert who is willing to testify.

12. If Defendant is allowed to withdraw admissions as to damages, Plaintiff will be detrimentally prejudiced and the withdrawal will not aid in the presentation of the claims on the merits, especially in light of Defendant’s conduct bringing about circumstances where no expert is willing to testify on behalf of Plaintiff.

13. In any event, Plaintiff has been unable to obtain an expert despite diligently trying. Counsel could not even get Dr. Amato [who is a regular testifying expert in civil litigation] to agree to be a testifying expert for Counsel even though Counsel had been specifically referred to Dr. Amato by an attorney with whom Dr. Amato has a close working relationship.

Sworn under the pains and penalty of perjury this 22nd day of March, 2021.

Respectfully submitted,

REO LAW, LLC

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

Dated: March 22, 2021

CERTIFICATE OF SERVICE

I, Bryan Anthony Reo, affirm that I am counsel of record for a party to the above-captioned civil action, and on March 22, 2021, I served a true and accurate copy of Declaration of Counsel of Bryan Anthony Reo upon Martin Lindstedt, 338 Rabbit Track Road, Granby, MO 64844, by placing the same in a First Class postage-prepaid, properly addressed, and sealed envelope and in the United States Mail located in Village of Mentor, Lake County, State of Ohio.

Respectfully submitted,

REO LAW, LLC

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

Dated: March 22, 2021