

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

STEFFANI ROSSI REO, ANTHONY
DOMENIC REO, BRYAN ANTHONY REO,
ATTORNEY KYLE BRISTOW,
BRETT KLIMKOWSKY, et. al.,

Plaintiff(s) / Counter-Defendants,

v.

MARTIN LINDSTEDT, PASTOR ,
Defendant / Counter-Claimant.

Case No. 1:19-CV-02786-cab

Hon. Christopher A. Boyko

Mag. Thomas M. Parker

FILED
DEC 10 2019
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

**DEFENDANTS ANSWER TO STEFANI ROSSI REO WORKING IN COLLUSION
WITH HER HUSBAND BRYAN REO TO STEAL PASTOR LINDSTEDT'S
INHERITANCE WITH COUNTER-CLAIMS AGAINST PLAINTIFF REO AND
ADDITIONAL REO PLAINTIFFS AND REO COUNTER-DEFENDANTS,**

**ALSO THE LAKE COUNTY COURT OF COMMON PLEAS & JUDGE PATRICK
CONDON FOR EXCEEDING THEIR JURISDICTION (IF ANY),**

**AND THE STATE OF OHIO AND FEDERAL GOVERNMENT FOR ALLOWING REO
PLAINTIFFS TO VIOLATE FIRST AMENDMENT RIGHTS OF PASTOR LINDSTEDT
& LINDSTEDT'S CHURCH UNDER COLOR OF LAW**

I. OVERVIEW OF THE AMENDED ANSWER AND COUNTER-CLAIMS

COMES NOW the current Defendant Pastor Martin Lindstedt (hereafter in person described as "Pastor Lindstedt") along with his Church of Jesus Christ Christian / Aryan Nations of Missouri (hereafter Lindstedt's Church) to make an Answer to plaintiff Stefani Rossi Reo (hereafter Mrs. Reo) who has filed this fraudulent litigation at the behest of her husband Attorney Bryan Anthony Reo for purposes of theft under color of law and to make a Counter-Claim against Bryan Reo Plaintiffs Anthony Domenic Reo (hereafter Bryan Reo's father) and Bryan Anthony Reo and Bryan Reo fellow lawyers Kyle Bristow and Brett Klimkowsky from the not-

quite defunct Foundation for the MarketPlace of Ideas, an Antifa agents-provocateur false-flag operation formerly pretending to be a White Supremacist “lawfare” organization as Reo “Co-Conspirators” under 42 U.S.C. 1981 & 1983.

These Bryan Reo cases are mere fraudulent attempts by Bryan Reo to steal under color of law Pastor Martin Lindstedt’s South Dakota inheritance one \$500,000 chunk at a time. These four Lake County Ohio cases now before the federal court are as follows:

Bryan Anthony Reo v. Martin Lindstedt 19-cv-2103 (formerly 19cv001304 Lake County)

Bryan Anthony Reo v. Martin Lindstedt 19-cv-2589 (formerly 19cv001530 Lake County)

Anthony Domenic Reo v. Martin Lindstedt 19-cv-2615 (formerly 19CV001531 LC)

This one is *Stefani Rossi Reo v. Martin Lindstedt 19-cv-2786 (formerly 19CV001466)*

Not counter-claimed at this time because it might upon discovery become a federal question are the Lake County Court of Common Pleas and Judge Patrick Condon for exceeding any jurisdiction, if they had any in the first place, in bringing to trial Pastor Lindstedt and Lindstedt’s Church for the exercise of their supposed First Amendment “rights” of Free Speech and Religion and Press in discussing Bryan Reo and Reo co-conspirators past and present behavior when they are limited-purpose and/or public figures within the White Supremacist Movement. This two judicial branches / officials after discovery may be sued for injunctive and declaratory relief. The State of Ohio may be sued for granting lawyers a “patent of nobility” above the law to where they insist that non-commercial religious organizations incorporated only to accomplish their religious beliefs must hire these private officers of the Ohio Courts and cannot defend themselves otherwise other than by religious warfare.

As part of this federal question is the U.S. Federal Government for imposing all these agents provocateurs like Bryan Reo, Brett Klimkowsky, Kyle Bristow, (and William Finck) to

spy / co-opt the White Supremacist & Christian Identity Movement and Pastor Lindstedt & Lindstedt's Church in particular to harass with frivolous and malicious quasi-legal persecution under color of law to violate the First Amendment paper "guarantees" of Freedom of Religion, Speech, and of the Press. Bryan Reo is the sole reason for these lawsuits all removed from the Lake County Court of Common Pleas to this federal court. Stefani Rossi Reo is the Reo family member catspaw used by Bryan Reo now to steal Defendant's South Dakota inheritance one \$500,000 chunk at a time.

Pastor Lindstedt needs access to Electronic Case Filing to counter Bryan Reo crookedness in refusing to mail off its numerous Motions so that Pastor Lindstedt's replies and motions can be timely and cheaply filed in both defense and offense.

II. PARTIES

Plaintiff / Counter-Defendant Parties Suing & Being Sued by Defendant

1. Bryan Reo is the main Plaintiff acting against Defendant Pastor Lindstedt and if it wasn't for Bryan Reo none of these unnecessary cases would exist. Bryan Reo is a public or limited-purpose public figure within the White Supremacist / Christian Identity community. In fact, Reo is actually a non-white Anti-racist activist and agent provocateur who founded the Foundation for the MarketPlace of Ideas as a supposed White Supremacist "lawfare" public corporation. Thus while Reo implausibly claims to be a private figure, Reo's conduct against Pastor Lindstedt and Lindstedt's Church is that of a public figure with no cause for action under *New York Times v. Sullivan*, 376 US 254. Reo has been abusing legal process against Pastor Lindstedt since April 2014 when Reo filed a federal lawsuit against Pastor Lindstedt, lost, then refiled in Lake County, and after four years has won, whereupon Reo has filed four new lawsuits against Lindstedt, two

for itself and one each for its wife and father. Bryan Reo lives in the same house as its wife and father at 7143 Rippling Brook Lane, Mentor Ohio 44060.

2. Stefani Rossi Reo (hereafter Mrs. Reo) is Bryan Reo's wife and the putative plaintiff in this federalized case Reo v. Lindstedt 19-cv-02786. Pastor Lindstedt saw her jumping up and down in the hallway of the Lake County Courthouse at trial on 25 June 2019 trying to get Bryan Reo's and another person's attention (who Pastor Lindstedt later found out was Bryan Reo's father.) Pastor Lindstedt republished a Bryan Reo "Quora" article about her deceiving Reo with talk of wanting children, avoiding a divorce, then deceiving Reo again which Reo since deleted. Bryan Reo routinely incites a response from Pastor Lindstedt then removes the *causus belli* incitement, thus destroying evidence of Bryan Reo deceit. She is also now suing Pastor Lindstedt for \$500,000 for Lindstedt publishing these observations, even though she was not mentioned by name but rather by nickname. In this particular case Pastor Lindstedt just filed to remove her case to federal court. Mrs. Reo lives with Bryan Reo at 7143 Rippling Brook Lane, Mentor Ohio.

3. **Anthony Domenic Reo** is Bryan Reo's father (hereafter Bryan Reo's father). Pastor Lindstedt had counter-sued Bryan Reo's father in the 2014 federal and 2015 Lake County cases but Bryan Reo evaded service on behalf of its father. The first day of the Lake County trial on 24 June 2019 Bryan Reo told its father to not show up because Pastor Lindstedt was so vile. So the next day when Pastor Lindstedt seen Mrs. Reo jumping around in the hall and neither Reo nor Reo's father paying any attention to her, Pastor Lindstedt assumed that it was because they were homosexual mongrels. Later when Bryan Reo sent its 9 Sept 2019 filing for *Stefani Rossi Reo v Martin Lindstedt* 19VC001466 Pastor Lindstedt figured out that what he had mistook for a homosexual mongrel was Bryan Reo's father – a mongrel yes, but probably not a homosexual mongrel. Bryan Reo's father is suing and being counter-sued by Pastor Lindstedt under the

supervision of Bryan Reo for \$500,000 in *Anthony Domenic Reo v. Martin Lindstedt* 19-CV-2615 in federal court. All four of these bogus Bryan Reo cases have been removed to federal court. Bryan Reo is having his father and wife help file these cases in order to overwhelm Pastor Lindstedt in legal foolishness trying to gain through abuse of legal process Pastor Lindstedt's inheritance one \$500,000 chunk at a time. Bryan Reo's father lives with Bryan Reo's wife and Bryan Reo at 7143 Rippling Brook Lane, Mentor Ohio 44060.

4. Attorney Kyle Bristow, Esq. 42383 Garfield Rd, Mt. Clemens MI(?), PO Box 381164 Clinton Twp 48038. Law Office (248) 838-9934 BristowLaw@gmail.com is Chairman of the Foundation for the MarketPlace of Ideas (FMI) and Bryan Reo was Bristow's "law clerk" and on the Board of Directors. FMI was a "White Supremacist" 501(c)(3) corporation which practiced "lawfare" for what turned out to be federal agents provocateur "leading" the "Alt-Right" in forcing state university systems to host Richard Spencer – also on the Board of FMI like Bryan Reo and Brett Klimkowsky. FMI dissolved itself in early March 2018 with the resignation of Kyle Bristow. However, Kyle Bristow drafted and wrote a motion for attorney's fees for Brett Klimkowsky and submitted by Bryan Reo on July 24, 2019. Thus Kyle Bristow and Brett Klimkowsky are still actively conspiring with Bryan Reo to steal Pastor Lindstedt's inheritance and violate Pastor Lindstedt's and Lindstedt's Church's First Amendment and other civil rights.

5. Attorney Brett Allan Klimkowsky, Esq. P.O Box 114, Martin Ohio 43445 (419-360-1738) brett1066@gmail.com was Bryan Reo's lawyer and around July 23 2019 re-appeared under Bryan Reo's Motion for Attorney's Fees which Attorney Kyle Bristow wrote and to make an affidavit for \$4200. Brett Klimkowsky, like Bryan Reo were members of the Board of FMI. However, like Bryan Reo they are actually liberals pretending to be White Supremacists until they decided that they didn't want to play White Supremacist any more in March 2018 after

getting public criticism for racism.. All three of FMI Attorneys Reo, Bristow and Klimkowsky are actively working as of July 24, 2019 against Pastor Lindstedt and Lindstedt's Church and so they are hereby added to this suit through counter-claim against Bryan Reo Plaintiffs.

6. Lake County Ohio Court of Common Pleas / Judge Patrick Condon. Bryan Reo uses the Lake County Court of Common Pleas to enrich itself through abuse of legal process both before and now that it is an officer of that Court. Bryan Reo has "won" a judgment for \$40,000 in unnamed compensatory damages, \$50,000 in punitive damages in Reo. v. Lindstedt 15CV001590, and \$15,000 for "false light" against Lindstedt and \$200 in compensatory and \$200 in punitive damages against Pastor Lindstedt's Church in Reo v. The Church of Jesus Christ Christian / Aryan Nations of Missouri in Reo v. The Church of Jesus Christ Christian / Aryan Nations of Missouri 16CV000825 (which claimed jurisdiction when the Mentor Municipal Court declined to exercise becoming a Bryan Reo litigation mill and kicked it up to Lake County). There should be no real jurisdiction regarding what is said over the Internet eight or nine years ago between warring public figures 900 miles apart, several states away and violative of the First Amendment, otherwise there can be no Internet. Yet the Lake County Court and Judge Patrick Condon has held a trial on claims barred by the Ohio Statutes of Limitation, refused to allow Pastor Lindstedt to present evidence in his own favor, issued improper jury instructions, empaneled a biased jury, and conducted farcical proceedings. Indeed, how is it possible to sue a Church for mere "words" as in Reo v. Aryan Nations of Missouri except by violating the First Amendment paper guarantees of Freedom of Speech and Religion and the Press? In this Answer and Counter-Claim Pastor Lindstedt intends to add the Lake County Courts or Judge Patrick Condon at a later time for conspiracy and collusion to violate the civil

rights of Pastor Lindstedt and Lindstedt's Church. It is upon discovery Pastor Lindstedt intends to joinder these parties as this case progresses.

7. The State of Ohio. The State of Ohio presumes to "license" attorneys who are otherwise self-regulated by their bar associations and Ohio Supreme Court. Thus Bryan Reo has been allowed to run wild filing frivolous and malicious litigation against Pastor Lindstedt and Lindstedt's Church. Furthermore, the Ohio Supreme Court has given attorneys a false patent of nobility to where Pastor Lindstedt couldn't defend in their court his Church. Therefore a federal question is why cannot a Church be represented by its clergy as part of its exercise of religion and free speech? Contrary to Bryan Reo's lies, the Church of Jesus Christ Christian / Aryan Nations of Missouri is NOT a 501 (c)(3) organization or anything else other than a non-profit religious organization for the benefit of Aryan Christian Israelites to advance Dual-Seedline Christian Identity beliefs. Bryan Reo used the mere name "Aryan Nations" to inflame a hostile jury and to get at Pastor Lindstedt under color of trial. Therefore the State of Ohio, its bar associations and legal associations, and its courts absent any jurisdiction over the Church are violating the First Amendment and should be upon discovery possibly be joindered for civil rights violations later albeit not today in the Defendant's Answer & Counter-Complaint.

8. The US Government. The Federal Government operates agents provocateur and informants designed to go within White Supremacy and Christian Identity groups, especially those calling themselves Aryan Nations. It is suspected that Bryan Reo is one of these agents provocateur and informants placed to disrupt through bogus legal process Pastor Lindstedt and Lindstedt's Aryan Nations Church. Indeed Bryan Reo has admitted to being a federal informant with others. Therefore, as this case proceeds via discovery Pastor Lindstedt intends to joinder the Federal Government for letting Bryan Reo serve as an informant and .agent provocateur and as a means

of destroying Pastor Lindstedt and Lindstedt's Church through this fraudulent and vexatious litigation in the Lake County Ohio courts and this federal court.

The Defendant(s) / Counter-Claimants Parties.

9. Pastor Martin Lindstedt. Having learned the fundamentals of Christian Identity since the age of 10, Pastor Lindstedt converted to the more militant Dual-Seedline Christian Identity doxology and came into the White Supremacy Movement through operating two local militias post-Waco to 1997. Pastor Lindstedt has operated a web page since Feb 1996, publishing mostly racist and Dual-Seedline Christian-Identity. Since 2009 Pastor Lindstedt has operated a Christian_Nationalist forum at <http://whitenationalist.org/forum> and <http://christian-identity.net/forum> and many other blogs and forums. Pastor Lindstedt has had a podcast and used other Internet media to express his White Supremacist politics and Christian Identity religious views. Bryan Reo has taken it upon itself to take down Pastor Lindstedt's forums, web pages and blogs since March 2010 before Pastor Lindstedt found out Bryan Reo's real name and where it lived on Oct. 29, 2010. Since then Bryan Reo intensified its oppression and suppression of the fact that Bryan Reo isn't white or heterosexual, but until 2013 or 2014 Bryan Reo thought Pastor Lindstedt was poor. Then Bryan Reo found out about Pastor Lindstedt's inheritance of 1800 acres in South Dakota and decided to file a federal lawsuit DMCA lawsuit, then when that was dismissed to immediately file before Lake County Ohio a new lawsuit even though the Ohio Statute of Limitations had passed. Reo played games with discovery and Lindstedt didn't play so Reo got onto a NIM-Busters forum, impersonated Pastor Lindstedt making death threats against Reo, then sought and gained a fraudulent stalking protection order that Pastor Lindstedt did not contest because Lindstedt didn't want to drive 900 miles to Lake County. After nearly four years of filing Motions to Strike and Continuances two lawsuits, Reo v. Lindstedt 15CV001590 and

Reo v. Lindstedt 16CV000825 went to trial in Lake County and a biased judge (Patrick Condon) refused to allow Pastor Lindstedt to present any evidence in his own favor, refused to acknowledge the Ohio Statutes of Limitations barred prosecution of Reo's litigation, empaneled a biased jury slaving to convict the Aryan Nations pastor and an Aryan Nations Church, refused to sanction Bryan Reo for perjury and abuse of legal process, refused to allow any jury instructions on behalf of Lindstedt, and ruled against Lindstedt so far for a directed verdict of overturning the jury verdict of \$105,000 against Pastor Lindstedt and \$400 against Pastor Lindstedt's Church. Since then Bryan Reo has gotten a lien placed against Lindstedt's South Dakota inheritance and has threatened to sell at Sheriff's sale Pastor Lindstedt's and Roxie Fausnaught's modest primary residence in Missouri while the case is on appeal. Bryan Reo has filed four more bogus and fraudulent lawsuits in Lake County Ohio. The first one filed Bryan Reo v. Martin Lindstedt 19CV001304 for defamation, etc. was removed to this federal court for this instant case, *Reo v. Lindstedt*, 19-cv-2103. Bryan Reo also filed another lawsuit on behalf of its wife, *Stefani Rossi Reo v. Martin Lindstedt* 19CV001466, another one for itself once this case was removed to federal court again in Lake County, *Bryan Reo v. Martin Lindstedt* 19CV001530 (now *Reo v. Lindstedt* 19-CV-2589) and one on behalf of its father *Anthony Dominic Reo* 19CV001531 (now *Anthony Domenic Reo v. Martin Lindstedt* 19-CV-2615) – all seeking \$500,000 apiece in damages in order to get the rest of Pastor Lindstedt's South Dakota inheritance worth \$2,000,000. Pastor Lindstedt has or is having all of these frivolous Lake County Reo family cases removed to this federal court for trial. Pastor Lindstedt is merely reporting factually on the antics and doings of a federal agent provocateur / ZOGbot limited-purpose public figure named Bryan Reo / SwordBrethren / and other aliases and should have the full protection of the First Amendment. Bryan Reo and Reo conspirators should be counter-sued

in order to end and deter this Bryan Reo assault upon the First Amendment and Pastor Lindstedt, Lindstedt's Church, and Lindstedt's property.

10. The Church of Jesus Christ Christian / Aryan Nations of Missouri Is a Church

Corporation in good standing within the State of Missouri since Oct. 2006 when Pastor Lindstedt had Roxie Fausnaught, his woman, file the paperwork before the Missouri Secretary of State for \$25. The purpose of incorporation was to allow Pastor Lindstedt to call himself a "Pastor" and even an ArchBishop without having to buy an expensive and largely worthless credential from some seminary which in any case doesn't know a tenth as much Dual-Seedline Christian Identity doxology as Pastor Lindstedt. This Court has ruled that Pastor Lindstedt's Church cannot be represented by Pastor Lindstedt, its non-lawyer head. (Page 6 Doc. 19 ORDER). However, Bryan Reo has abused his position as an attorney to sue Pastor Lindstedt's Church and Lindstedt's elderly illiterate bed-bound illiterate bed-bound 63-year-old domestic partner Roxie Fausnaught with his frivolous and malicious abuse of legal process. Bryan Reo has bragged in the past that he would "purchase" the name of Ku Klux Klan from some derelict and then initiate spurious litigation against other Klan incorporations to make himself the leader of the Klan. Bryan Reo is doing much the same in an attempt to take over Dual-Seedline Christian Identity Churches on behalf of its friend William Finck and itself.

<http://www.whitenationalist.org/forum/showthread.php?1644-Did-you-know-that-I-m-going-to-sue-Aryan-Klansmen-for-violating-muh-copyright>

10.B Bryan Reo has also gloated that it is going to use litigation to render Pastor Lindstedt penniless by stealing under color of law the assets of Pastor Lindstedt and Lindstedt's Church and give some of it back to William Finck, another federal agent provocateur running a spurious Christian Identity ministry. See "Pray for My Success" of August 2014:

<http://whitenationalist.org/forum/showthread.php?p=11266#post11266>

http://mamzers.org/pastorlindstedt/lindstedt/legal/SoredMamzer/2014/Aug14/SueMarty_25Aug14-a-a.jpg

10.C. Therefore, while Pastor Lindstedt is constrained from having his Church as a victim of Bryan Reo legal assault as a party in this Answer and Counter-Claim, Pastor Lindstedt wishes to make a claim that his and his Church's First Amendment rights to freedom of religion have been violated by Bryan Reo and Reo co-conspirators and make of it a federal question under 42 U.S.C. 1983 and other sections of the federal code as discovery progresses.

III. JURISDICTION AND VENUE

11. This Court acknowledges that "the court notes that it has jurisdiction over this matter." "Defendant properly removed the case to this court." Reo v. Lindstedt 19-cv-2103 ORDER, Doc 19, p3.) This is on the basis of diversity of citizenship when the civil actions in controversy exceed \$75,000. However, it is a federal question as well because Bryan Reo is asking for an unconstitutional "gag order" and seeking, along with his co-conspirators to violate the First Amendment civil rights of Pastor Lindstedt and Lindstedt's non-501(c)(3) Church using abuse of legal process and vexatious and frivolous litigation to shut them up about the truth about Bryan Reo and Bryan Reo co-conspirators like Reo's wife, father, and lawyer friends. Thus they are in a conspiracy under 42 U.S.C. 1983 and 1985. If the federal government is working Reo and Reo conspirators as agents provocateur and paying them through confiscation of Pastor Lindstedt's property then the federal government is being sued as well and this court has additional jurisdiction to hear the case. In no instance does Pastor Lindstedt slip out of this matter once initiated by lessening the litigation amount below \$75,000 so Pastor Lindstedt is trying to use discovery to joinder additional Reo conspirators as well as counter-suing for \$500,000 against Bryan Reo. All four of these Bryan Reo cases (Reo v. Lindstedt 19-cv- 2103, 19-cv-2589, 19-cv-2615, and 19-cv-2786) have been removed to federal court.

ANSWERING BRYAN REO LIES / REO 'FACTS' – 19CV001466 (this case removed)

12. Plaintiff's Claim: *Defendant has a long history of libeling Plaintiff's husband Bryan Anthony Reo and Defendant lost a jury trial in the consolidated cases of 16CV000825 and 15CV001590 with a verdict being rendered in favor of Plaintiff's husband on claims of defamation per se and false light on 6/26/2019 for libel that occurred throughout 2015 and 2016. The jury awarded Plaintiff's husband \$105,000.00 against Defendant Martin Lindstedt and \$400.00 against his so-called church.*

12 A. Defendant's Answer. Putative Plaintiff **Stefani Rossi Reo** is simply being used as a catspaw for Bryan Reo litigation aimed at stealing under color of "defamation" Pastor Lindstedt's inheritance one \$500,000 chunk at a time. Bryan Reo is a limited-purpose public figure who routinely calls Pastor Lindstedt a "child molester" since 2010 and at trial in June 2019 and the corrupt Lake County Judge Patrick Condon without jurisdiction aided and abetted Bryan Reo by disallowing Pastor Lindstedt to put on a defense and giving Bryan Reo a verdict now under appeal. In any case, what happens between Mrs. Reo's husband and Pastor Lindstedt is not really a matter of any lawful legal interest to Mrs. Reo but rather a pretext drafted up by Bryan Reo.

13. Plaintiff's Claim: *Defendant has since shifted focus from only defaming Plaintiff's husband ("Bryan Anthony Reo") to now defaming Plaintiff ("Stefani Rossi Reo") and Plaintiff's father-in-law ("Anthony Domenic Reo").*

13 A. Defendant's Answer: Defendant has not bothered to name either putative Plaintiff Stefani Reo by name as other than a nickname for Mrs. Reo or to make any mention of her other than to reprint what Bryan Reo placed about her on a public Quora forum about how she deceived him by claiming to want children, nearly got divorced and then in order to avoid divorce lied some

more to Bryan Reo. That and an account about how she jumped up and down and was ignored by Bryan Reo and someone who turned out to be Bryan Reo's father. These false claims of defamation are mere perjury drafted by Bryan Reo in an attempt to defraud Defendant.

14. Plaintiff's Claim: *Defendant has taken a public post from the Quora forum wherein Plaintiff's husband discussed marital difficulties and cultural issues that existed between Plaintiff and Plaintiff's husband, and the previous joint petition for dissolution [since withdrawn] and cast the marital difficulties into a false light.*

14 A. Defendant's Answer. This is yet another false and perjurious claim made by Plaintiff and drafted up by Bryan Reo playing at being her attorney in what is admitted is that Bryan Reo was the one who made said Quora post whining about how his wife had deceived him into marriage by claiming to want children when all she wanted to do was to get out of Brazil into the United States and how she defeated divorce by lying some more. Furthermore she refuses to post the Quora post and Bryan Reo has destroyed the Quora post in question, thus destroying evidence of both of their perjury. The post in question can be seen in full and uncensored @ <http://whitenationalist.org/forum/showthread.php?p=20225#post20225>

15. Plaintiff's Claim: *Defendant has claimed that Plaintiff's husband is having a homosexual incestuous affair with Plaintiff's father-in-law [Plaintiff's husband's father].*

15 A. Pastor Lindstedt's Answer: Bryan Reo engages in outright perjury on this one and provides no hyperlink to what Reo alleges Pastor Lindstedt published. This perjury of both fact and law should be summarily punished by this Court imposing Federal Rule of Civil Procedure Rule 11 Sanctions upon Bryan Reo and all of the Bryan Reo and Reo family litigation against Pastor Lindstedt and Lindstedt's Church. What was said about Bryan Reo, its father and wife was put in a thread and then locked down since Pastor Lindstedt got word that Bryan Reo was filing a lawsuit on behalf of its wife. When the post was made there was the thinking that Bryan Reo's father was just another homosexual mongrel friend of

Bryan Reo and neither of the two homosexual mongrels were having sexual relations with Mrs. Reo who was jumping about like a fool around in the courthouse halls trying to get their attention on 25 June 2019. No incest and certainly not heterosexual incest was implied or stated. It wasn't until Bryan Reo sent Pastor Lindstedt a link concerning its litigation filed in Lake County concerning its wife that Pastor Lindstedt figured out that the other "homosexual mongrel" sitting next to Bryan Reo in the hall of the Lake County Court 25th June was its father, most definitely a mongrel but probably not a homosexual.

16 Plaintiff's Claim. *Defendant has claimed that Plaintiff's husband is having a homosexual incestuous affair with Plaintiff's father-in-law [Plaintiff's husband's father].*

16 A. Defendant's Answer. Pastor Lindstedt has made no such claim but rather Bryan Reo's wife, Bryan Reo's father, and Bryan Reo have drafted up and propounded this perjury made in their four civil complaints made before the Lake County courts hence removed to federal court in order to steal Pastor Lindstedt's inheritance one \$500,000 chunk at a time. These four Reo family defendants should be brought up on charges and Bryan Reo disbarred. See:

<http://whitenationalist.org/forum/showthread.php?p=20577#post20577>

17. Plaintiff's Claim. *Defendant has claimed that Plaintiff's marriage had difficulties because Plaintiff is a transgender prostitute from Brazil, who Defendant claims does not have a real vagina and that Plaintiff's husband is a homosexual.*

17 A. Defendant's Answer. Pastor Lindstedt has never claimed that Mrs. Reo is a "transgender prostitute" or made any claims or speculation about lacking a real vagina. This is simply yet more of Bryan Reo and Reo family perjurous perversion that they have made into litigation. Pastor Lindstedt has seen ample evidence over the past decade that Bryan Reo is a predatory homosexual that impersonates those it thinks are Aryan Christian Israelites (like "Victor Switzer" a fireman from Pine Bluff Arkansas and John Britton) on homosexual forums and in the federal courts trying to blackmail them into having homosexual sex with Reo. Pastor Lindstedt

has made no claim or even speculation as to the private parts of Mrs. Reo being real or not. Any admitted marital difficulties are likely caused by Bryan Reo not keeping its deal with Mrs. Reo.

18. Plaintiff's Claim: *Plaintiff is not a transgender, not a prostitute, and has proper female genitalia.*

18 A. Defendant's Answer: Again, Pastor Lindstedt has made no such claims and Plaintiff and her husband Attorney Bryan Reo should be sanctioned for their perjury in order to create this false, fraudulent and malicious litigation in order to steal Pastor Lindstedt's inheritance under color of law. Bryan Reo & Bryan Reo's lawyer friends should be disbarred for ginning up this.

19. Plaintiff's Claim: *Plaintiff's husband is not a homosexual.*

19 A. Defendant's Answer: Again, Mrs Reo is lying. Whatever deal she has with Bryan Reo doesn't mean that others must believe whatever lies & foolishness Bryan Reo drafts up for her.

20. Plaintiff's Claim: *Plaintiff's husband has not had a homosexual affair with his own father or with any man. Plaintiff's husband has not had any affair of any sort.*

20 A. Defendant's Answer: Only in Bryan Reo's and Bryan Reo's thieving family's perverted and self-serving imagination in these fraudulent litigations now moved to federal court is there any claim that Bryan Reo had homosexual sex with its father. However, the belief that Bryan Reo as a limited-purpose non-white public figure within White Supremacy and Christian Identity is a predatory and malicious homosexual is very wide-spread within the Movement.

21. Plaintiff's Claim: *The marital difficulties in Plaintiff's marriage had nothing to do with any infidelity on the part of her husband or herself.*

21 A. Defendant's Answer: Bryan Reo and its wife are making claims that Pastor Lindstedt made any such claims, which Pastor Lindstedt denies and neither Reo nor its wife are able to prove. This is simply more Bryan Reo and Reo family deceit which should be punished.

22. Plaintiff's Claim: *The marital difficulties in Plaintiff's marriage had nothing to do with any issues of Plaintiff not being an actual woman.*

22 A. Defendant's Answer: Yet still again in response to Reo family deceit and perjury, Pastor Lindstedt has made no claims as to Plaintiff's self-admitted "marital difficulties" being caused by Mrs. Reo not being a genetic female. Rather, based upon Bryan Reo's public Quora post which Bryan Reo took down, it is most likely that Bryan Reo married a Brazilian Sephardic jewess that wanted to come to America and the deal they had was that her sole function was to enable Bryan Reo to pretend not to be a homosexual any more and that she wouldn't have to have bear any children at all, much less Bryan Reo's, and that Bryan Reo broke the deal like Bryan Reo breaks all of its deals with others. Bryan Reo is deceitful with everyone.

23. Plaintiff's Claim: *Defendant has cast Plaintiff and her marital difficulties into a false light that would be seen as objectionable to any reasonable or normal individual based on the false light in which the circumstances were portrayed.*

23 A. Defendant's Answer: Again, the self-admitted "marital difficulties" are nothing more than a Quora post produced by their own admission by Bryan Reo, which Bryan Reo destroyed as evidence. The only other thing described by Pastor Lindstedt was Mrs. Reo jumping about in the Lake County Courthouse hallway trying to get Bryan Reo's and another mongrel's attention (who Pastor Lindstedt later found out was Bryan Reo's father) and not getting it. Pastor Lindstedt thinks that Mrs. Reo is athletic and is able to jump real good. And is dishonest.

24. Plaintiff's Claim: *Defendant's claim that Plaintiff is a transsexual prostitute who should be deported back to Brazil is defamatory per se. Prostitution is a crime and it is a crime of moral turpitude.*

24 A. Defendant's Answer: Still yet again, Pastor Lindstedt has not claimed that Mrs. Reo is either a transsexual nor a prostitute, much less both. Bryan Reo and Mrs. Reo are lying again.

25. Plaintiff's Claim: Plaintiff has never been charged with any crime.

25. Defendant's Answer: Pastor Lindstedt has not made any such claim of Mrs. Reo other than of filing this fraudulent, frivolous and malicious litigation at the insistence of Bryan Reo.

26. Plaintiff's Claim: *Plaintiff has never committed any act of prostitution.*

26 A. Defendant's Answer: This is the third or fourth time that Mrs. Reo at the instigation of Bryan Reo has made this false and perjurious claim that Pastor Lindstedt has denied yet again.

27. Plaintiff's Claim: *Defendant has also stated that Plaintiff is barren and incapable of conceiving a child, casting into false light the issues Plaintiff is having due to her fears of motherhood and her present hesitancy to have a child, not issues of Plaintiff being barren or unable to have a child.*

27 A. Defendant's Answer: Bryan Reo made an admitted public Quora post on Aug. 23, 2019 (which Bryan Reo took down, thus destroying evidence as it always does in instigating a response and then hiding the provocation, like calling Pastor Lindstedt a "child molester"). The gravamen of the Quora post was that Mrs. Reo promised to have many children by him, then refused, so Reo initiated divorce proceedings, Mrs. Reo then hastily promised to have a child, they reconciled, and then Mrs. Reo admitted to deceit and Bryan Reo lamented about that. To anyone knowing anything about Bryan Reo it seemed that Reo married her in order to pretend to not be a homosexual and having children wasn't part of the deal. But for some reason Bryan Reo got dissatisfied, so she pretended to promise at least one child, Reo terminated the divorce proceedings, and then Mrs. Reo said that she didn't want any children. Bryan Reo posts thousands of these delusional and idiotic Quora posts in which Reo pretends to be Aryan

Christian Israelite of impeccable Germanic Aryan ancestry and a literal genius on Hitler (which Reo is pretty good at) and law and relationships. The most ridiculous of which Pastor Lindstedt posts on his Church forum. Every one of five posts concerning Mrs. Reo was on one thread and when Bryan Reo initiated this fraudulent litigation the entire thread was locked and shut down “as is”. There is absolutely no basis for this frivolous and fraudulent litigation. See:

<http://www.whitenationalist.org/forum/showthread.php?2101-OI-Niggerlips-v-Mrs-Niggerlips>

28. Plaintiff's Claim: Defendant has caused injury to Plaintiff in excess of five hundred thousand dollars (\$500,000.00)

28 A. Defendant's Answer. With this claim Bryan, Anthony, and now Stefani Reo have committed criminal fraud through abuse of legal process, by filing four defamation lawsuits, all removed to this federal court. Acting in criminal conspiracy with its wife and father, *Bryan Anthony Reo v Martin Lindstedt*, 19-cv-02103 and 19-cv-02589, and *Stefani Rossi Reo v. Martin Lindstedt* 19-cv-2786 and father *Anthony Dominic Reo v Martin Lindstedt* 19-CV-2615 with these four bogus and frivolous lawsuits they expect to steal through abuse of legal process Pastor Lindstedt's entire South Dakota inheritance of 1800 acres worth approximately \$2 million. Bryan Reo has plotted with William Finck to do so since its federal lawsuit back in August 2014, in its civil complaint filed in 19CV00001304 on page 11 under punitive damages it asks for the entire \$2 million dollar property for its delusional and thieving demands for damages. Indeed it has already tried to extort Pastor Lindstedt for \$2,500,000 to “settle” in an e-mail sent to Pastor Lindstedt on behalf of Reo's entire criminal family on Oct. 5, 2019.

<http://whitenationalist.org/forum/showthread.php?p=20441#post20441>

The screen shot of this extortionary demand has already been submitted to this court in

Defendant's Doc. 13 Exhibit 1 filed on Oct. 10, 2019 (19-cv-02103) albeit page #2 wasn't scanned in.

http://bryanreo-lawsuits.xyz/2019/NewtonCounty/Oct19/5Oct19/BR2MLb_5Oct19_814pm.jpg

28.B Bryan Reo, Bryan Reo's father Anthony Dominic Reo and Reo's wife should be criminally charged and prosecuted for this extortionary scam as well as Reo sanctioned and disbarred for criminal activity as an officer of this federal and state court system.

IV. PASTOR LINDSTEDT'S COUNTER-CLAIM AGAINST BRYAN REO AND REO DEFENDANTS, (Stefani & Anthony Reo, Attorneys Kyle Bristow, Brett Klimkowsky)

29. Bryan Reo has made it quite clear that it is filing four fraudulent defamation actions, two by itself, one by its wife and one by its father for \$500,000 each in order to take away through legal activity before the Lake County Courts Pastor Lindstedt's South Dakota inheritance or at the very least beggar Pastor Lindstedt through having to defend himself through this legal activity. These all four of these actions have been removed to federal court from Lake County. This court in Reo v. Lindstedt 19-cv-02103 (Oliver) is refusing to allow Pastor Lindstedt to file defensively through electronic filing, forcing Pastor Lindstedt to defend himself via the expensive and slow US Mail, in which Pastor Lindstedt's response time is slowed by the necessity of allowing three days for the mail to arrive. Thus Bryan Reo is allowed to abuse the court system of Lake County and this federal court in order to make of Pastor Lindstedt a professional defendant to Bryan Reo and Reo family professional plaintiffs.

30. Bryan Reo made it quite clear that he wants Pastor Lindstedt's South Dakota ranch worth around \$2 million by filing these four lawsuits. Bryan Reo found out about Pastor Lindstedt's inheritance in 2013, so Reo took down its web pages on William Finck's blog calling Pastor Lindstedt a "convicted child molester" and initiated its first federal lawsuit in April 2014. Since

them Bryan Reo has given Pastor Lindstedt and Lindstedt's Church no rest in the federal and state courts for the better part of six years. Pastor Lindstedt has reported the truth about Bryan Reo, Reo's lawyer friends, and Reo's fellow agents provocateurs infesting the White Nationalist and Christian Identity Movements. Bryan Reo isn't white or heterosexual. Practically nothing has been said about Bryan Reo's wife and father, not even their names.

31. The only way for this "legal terrorism" on the part of Bryan Reo and Reo co-defendants to end against Pastor Lindstedt is for Reo to be successfully counter-sued and Reo to be disbarred and constrained from further practice before the state and federal courts, along with Reo's lawyer friends Kyle Bristow and Brett Klimkowsky. Bryan Reo's wife and father need to be likewise deterred from signing on as Bryan Reo "clients" in trying to steal Pastor Lindstedt's inheritance to which they are not entitled to. Therefore today Pastor Lindstedt is counter-suing Attorney Bryan Reo, Bryan Reo's wife Stefani Rossi Reo, Bryan Reo's father Anthony Domenic Reo, and Attorneys Kyle Bristow and Brett Klimkowsky for this fraudulent litigation versus Pastor Martin Lindstedt in this Answer and Counter-claim.

42. Likewise the Lake County Ohio Court System in general and Judge Patrick Condon in particular need to be constrained from in effect repealing and/or violating the First Amendment by exceeding their jurisdictional limits by dragging forth an Aryan Nations pastor and his Church across state lines 900 miles away to face charges of racism for daring to write the truth about a professional anti-racist activist practicing "lawfare" before a hostile jury acting as a lynch mob in which a corrupt judge doesn't allow said Southern White Man to present any real defense. At this time Pastor Lindstedt is not making a formal counter-claim against Lake County or Judge Condon for allowing Bryan Reo to run wild on the "lawfare" against Pastor Lindstedt sans any jurisdiction over what is said over the Internet between old enemies who are public figures.

However, upon discovery a claim by Pastor Lindstedt for these violations of the First Amendment under 18 42 U.S.C. might well be filed against the Lake County Court and Judge Condon for exceeding their jurisdiction to where they are allowing Bryan Reo to censor the Internet against Reo's enemies dating from the days Reo was pretending to be a racist leader.

33. The State of Ohio. The State of Ohio has granted patents of nobility (Esquire) to a parasitic class of vermin which have taken over the court system known as licensed attorneys / Officers of the Court without taking much, if any, care as to their integrity or allegiance to either the law or truth. The end result is that lawyers get to define for themselves a sort of monopoly license to steal under color of law by filing vexatious litigation such as that which Bryan Reo filed against Pastor Lindstedt, Roxie Fausnaught and Pastor Lindstedt's Church of Jesus Christ Christian / Aryan Nations of Missouri non-profit, non-501(c)(3) Church secure in the knowledge that this Dual-Seedline Christian Identity Church views these worldly governments as being run by Satan and thus refuse to hire one of Satan's minions, i.e. lawyers especially one to protect them against one of Satan's spawn, i.e. Bryan Reo and family and friends. The proper way to defend one's church is to on occasion strike back through open religious and civil warfare so that the State recognizes that it is far safer to let the Church alone in peace. Bryan Reo has deliberately used this usurpation and denial of the First Amendment to whip up Northeastern liberal jurors against racist Aryan Nations types like Pastor Lindstedt and Lindstedt's Church in Lake County and is hoping to take his act to the federal jury in Cleveland. As this is an answer and counter-claim today Pastor Lindstedt is not going to add the State of Ohio on as a party to this lawsuit, (indeed Judge Solomon has discouraged Pastor Lindstedt from doing so in 19-cv-2103 and Bryan Reo is using this as the basis for its innumerable Motions to Strike in 19-cv-2589 and 19-cv-2615). However, upon discovery Pastor Lindstedt wishes to raise the federal question under 42 U.S.C.

1983 as to whether the State of Ohio and its courts can deny non-commercial churches from defending themselves for exercising their First Amendment rights without having to use the services of the very parasitic class of regime criminals which are violating these supposed guaranteed civil rights.

34. The Federal Government, especially the US Attorney for the Northern District of Ohio. Bryan Reo is a non-white anti-racist activist turned pretend white supremacist / Christian Identity sub-pastor under Eli James and William Finck who has admitted to being a federal informant upon occasion. Pastor Lindstedt thinks that along with the entire 'former' Foundation for the Marketplace of Ideas founded by Bryan Reo, Kyle Bristow and Brett Klimkowsky and Richard Spencer as a White Supremacist "lawfare" 501(c)(3) organization which is still active against Pastor Lindstedt and Lindstedt's Aryan Nations Church that the FBI and other federal government organizations are sponsoring this violation of the civil rights of Pastor Lindstedt and Lindstedt's Church through its own domestic state-sponsored terrorism apparatus. US Attorney Justin Herdman gave out a press release against "lone wolves" wanting to engage in random shootings this October, while at the same time letting informants and agents provocateur to run wild destroying dissent through its own court system by allowing Bryan Reo, Bristow and Klimkowsky to "lawfare" Pastor Lindstedt and Lindstedt's Church. As this is an answer and counter-claim today Pastor Lindstedt is not going to add the US Government on as a party to this lawsuit. Indeed Judge Solomon has discouraged Pastor Lindstedt from doing so in the 19-cv-2103 Reo case. However, upon discovery Pastor Lindstedt wishes to raise the federal question under 42 U.S.C. 1983 as to whether this federal government and its courts can deny non-commercial churches from defending themselves for exercising their First Amendment rights

without having to use the services of the very parasitic class of regime criminals which are violating these supposed guaranteed civil rights under its own Constitution

V. TRIAL BY JURY DEMANDED

35. Defendant respectfully demands a trial by jury on all of the issues set forth herein that are triable by right. Civ.R. 38.

VI. CAUSES OF ACTION

COUNT I COMMON LAW DEFAMATION

36. The foregoing paragraphs of this Answer / Counter-Complaint are incorporated by reference as if fully set forth herein.

37. Defendant denies publishing false and defamatory statements about Plaintiff Stefani Rossi Reo (Mrs. Bryan Reo) to third-parties via the medium of the World Wide Web. Rather Defendant published a Quora public post that Bryan Reo put out on the Internet about how Reo was deceived by his wife, tried to divorce her for not wanting children, then reconciled and Mrs. Reo lied to him again about not wanting kids. Then Bryan Reo fraudulently took that public post down, thus destroying evidence for this case designed to steal \$500,000 from Defendant which Bryan Reo filed in the name of his wife. At the same time Bryan Reo gratuitously claims that its wife considers Pastor Lindstedt to be a ““pedophile piece of shit” such as yourself” and “a pedophilic child molesting neo-Nazi piece of shit.”

<http://whitenationalist.org/forum/showthread.php?p=20547#post20547>

38. Defendant’s opinions and observations about Plaintiff Stefani Rossi Reo were innocuous given that she didn’t do anything observed other than to jump up and down in the hallways of the Lake County Courthouse on 25 June 2019. Any other statements made about her were public records or made by Bryan Reo. When Bryan Reo threatened that it was going to file another

fraudulent and vexatious lawsuit against Pastor Lindstedt on behalf of its wife, Pastor Lindstedt immediately closed the thread with four posts on it on Lindstedt's forum and locked it down so that it can be seen by all without any changes as of the night of Sept. 9, 2019.

<http://www.whitenationalist.org/forum/showthread.php?2101-OI-Niggerlips-v-Mrs-Niggerlips>

39. Defendant acted without any negligence in making accurate and true statements about Plaintiff and Plaintiff's motivations which are designed solely to steal from Defendant.

40. Defendant acted reasonably in attempting to discover the truth or falsity of Bryan Reo's past and current history pertaining to pretending to be something it was not, i.e. a white supremacist or competent or ethical attorney in publishing commentary about Plaintiff. Stefani Rossi Reo is not an issue because Bryan Reo is merely using her as a pseudo-Plaintiff in order to file this one of four fraudulent, malicious and frivolous litigation for \$500,000 against Pastor Lindstedt.

41. Defendant's true and accurate statements about Mrs. Reo jumping up and down in the Lake County Courthouse are not defamatory per se insofar as there is nothing remarkable about that unless it is used as an excuse to file a frivolous lawsuit by Bryan Reo. The reprint of Bryan Reo's own public Quora post concerning its wife was meant to show that Bryan Reo has no natural affection for anyone, especially a wife Reo thinks deceived him when it is more likely that it is simply a Brazilian woman wanting to pretend to be a wife for a predatory homosexual wanting to pretend to be normal and manly within White Supremacy and Christian Identity circles. Neither Bryan Reo, Reo's wife or Reo's father belong pretending to be White Supremacists or even White, so off-hand statements of Reo Family "values" of deception / delusion are not actionable.

42. Defendant's off-hand statements about pseudo-Plaintiff Stefani Rossi Reo are not defamatory per se to the extent that some of the statements in question would lead to allegations or accusations of criminal conduct in violation of various sections in the Ohio Revised Code. It is

not against the law to jump up and down in a public place, or for deceit to take place between deceivers concerning their private living arrangements that Bryan Reo makes public. This is mere Bryan Reo legal boiler-plate meant to justify this frivolous and malicious litigation.

43. Defendant did not commit against Plaintiff Stefani Rossi Reo the common law tort of libel per se because Defendant didn't even mention her name or it was on public records.

44. Rather Bryan Reo and Attorney Kyle Bristow have knowingly libeled per se Pastor Martin Lindstedt by continually libeling him as a "convicted child molester" or "pedophile" from 2010 to at trial in June 2019 to today in e-mails while perfectly aware that this matter didn't even proceed to a preliminary hearing much less conviction or incarceration. Whether Stefani Rossi Reo has said Pastor Lindstedt is a "Neo-nazi pedophile piece of shit" is mere Bryan Reo hearsay used to generate this fraudulent litigation using her as a party. However, being a fraudulent plaintiff in a fraudulent action is grounds for this counter-suit and counter-claim. The notion of the party who is the real instigator of this vexatious litigation, Bryan Reo is that they get to libel Pastor Lindstedt while suing Pastor Lindstedt for innocuous statements of opinion and true fact posted upon the Internet. All the parties counter-sued today are the libelers or Bryan Reo libel enablers.

**COUNT II
COMMON LAW INVASION OF PRIVACY – FALSE LIGHT**

45. The foregoing paragraphs of this Answer / Counter-Complaint are incorporated by reference as if fully set forth herein.

46. Defendant made no false and derogatory statements about Plaintiff that Defendant publicized via the medium of the World Wide Web. Rather these statements were substantially true.

47. These truthful and informative statements made by Defendant about Plaintiff placed Plaintiff before the public in an accurate light of being a false accuser.

48. The true and accurate statements made by Defendant about Plaintiff Stefani Reo jumping up and down like a fool highly offensive only to people who wish to be offended, and not to a reasonable person who probably don't care one way or another about this matter. Bryan Reo made the Quora post, and then in a deceitful manner destroyed the evidence of its instigation.

49. Defendant is not at fault and knew or acted responsibly as to the truth of the statements made by Defendant that concern Plaintiff (i.e. the Quora post by Bryan Reo or jumping around).

50. As a direct and proximate result of Defendant's statements about Plaintiff, Plaintiff has been and will continue deceitfully claim largely imaginary and mythical damages claiming mental anguish and reputational injury. Bryan Reo, Stefani Reo and Anthony Dominic have instead insisted on filing these fraudulent and frivolous litigation seeking to steal Pastor Lindstedt's inheritance through abusive and fraudulent litigation and thus should be punished for doing so.

51. Defendant didn't commit against limited-purpose public figure Plaintiff Bryan Reo the tort of invasion of privacy – false light. Rather Plaintiff Bryan Reo using its wife Stefani Rossi Reo is committing against Defendant Pastor Martin Lindstedt the tort of abuse of legal process, malicious prosecution, etc.

COUNT III
COMMON LAW INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

52. The foregoing paragraphs of Defendant's Answer & Counter-Complaint are incorporated by reference as if fully set forth herein.

53. By and through publishing public records of fact about Plaintiff Stefani Rossi Reo being divorced at the instigation of Bryan Reo, by republishing Bryan Reo's public Quora lamentation about Stefani Reo not wanting to have issue by Bryan Reo but wanting to live with Reo, and about jumping about in a public place trying to get Reo's attention to third parties via the medium of the World Wide Web, Pastor Lindstedt engaged in First Amendment protected

conduct designed to explain the actual life-style choices of limited public figure Bryan Reo. Anti-Racist Activist and Professional Plaintiff Bryan Reo has continually called Pastor Lindstedt a “convicted child molester” since 2010 to today and claims that Plaintiff Stefani Rossi says Pastor Lindstedt is a “Neo-Nazi pedophile piece of shit”. By means of this fraudulent abuse of legal process Plaintiff Stefani Rossi Reo has suffered nothing. Rather, having his inheritance ripped away through abuse of legal process by Bryan Reo filing these frivolous lawsuits is what makes for emotional damage. Since April 2014 when Bryan Reo learned Pastor Lindstedt had an inheritance to steal promptly destroyed evidence of its conduct, has tried to take down Lindstedt’s web pages and proof of Reo misconduct, and filed these frivolous legal actions in Lake County Ohio and Ohio federal court. Bryan Reo could have left off fighting with Pastor Lindstedt but that would mean not being able to steal Pastor Lindstedt’s assets or silence under color of law Pastor Lindstedt and that did not suit Bryan Reo’s malicious purposes.

54. Lindstedt denies acting with an intentional or reckless *scienter* when Lindstedt published or republished these off-hand statements of opinion about nonentity Plaintiff Mrs. Reo.

55. Due directly and proximately to Lindstedt (re)publishing these true statements of fact about Plaintiff, Plaintiff Mrs. Reo has claimed or rather Attorney Bryan Reo has alleged -- falsely -- severe emotional distress in the form of vexation, irritation, anxiety, frustration, and hatred. There is absolutely nothing except fraud to this case on the part of Mrs. Reo being used by Attorney Bryan Reo in order to steal through deceit Pastor Lindstedt’s inheritance. Plaintiff Stefani Rossie Reo should be punished for this deceit, but Bryan Reo is the instigator.

56. Lindstedt not liable to Plaintiff for common law intentional infliction of emotional distress, but rather Bryan Reo is responsible for this vexatious and frivolous and malicious litigation.

COUNT IV
PERMANENT INJUNCTION / PERMANENT DISBARMENT OF BRYAN REO

57. The foregoing paragraphs of Defendant's Answer & Counter-Complaint are incorporated by reference as if fully set forth herein.

58. The improper and unlawful conduct of Pseudo-Plaintiff Mrs. Reo in making this frivolous and malicious litigation is made overt by Bryan Reo continuing to demand a "gag order" on Lindstedt continuing to report on Bryan Reo misconduct. Demanding permanent injunctive relief from publication by Plaintiff about Bryan Reo misconduct shows that the goal of Bryan Reo litigation is censorship and improper enrichment through abuse of legal process, not justice.

59. In the absence of the entry of a permanent injunction by the Court, Plaintiff Mrs. Reo will suffer no serious or irreparable harm and injury, but rather probably couldn't care less.

60. The entry of a permanent injunction will harm or burden Defendant because Defendant is allowed under the First Amendment of the US and of Ohio to speak freely concerning public figure Bryan Reo who has pretended to be one of us White Supremacists or Christian Identity. Bryan Reo saying otherwise merely goes to show Bryan Reo's motivations are evil and corrupt. There would be no such thing as a World Wide Web if left to the likes of Reo. Mrs Stefani Rossi Reo didn't draft up this demand for a gag order – Bryan Reo did as on the other three Reo Family lawsuits before this Northern District of Ohio removed from Lake County court.

61. Public policy favors at least the pretense of a First Amendment protecting the Free Exercise of Speech, of the Press, and of Religion, not pre-publication censorship of embarrassing truths concerning limited-purpose public figure Bryan Reo hiding behind its wife, Mrs. Reo. There has been nothing actionable said about Mrs. Reo although she allows herself to be used as an object of abuse of legal process against Pastor Lindstedt. This public policy thus favors the the entry of a permanent injunction and disbarment of Bryan Reo from filing this sort of malicious litigation against Pastor Lindstedt, Lindstedt's Church and against others by Bryan Reo.

62. Plaintiff Stefani Rossi Reo isn't the real one responsible – other than as a fraudulent Pseudo-Plaintiff used by her husband Attorney Bryan Anthony Reo to file for \$500,000 against Pastor Lindstedt's inheritance – for filing this frivolous and abusive malicious litigation. Bryan Reo is. There was nothing published or re-published that requires censorship. The adequate remedy for Mrs. Reo is available at law of proper behavior including not filing these frivolous litigation attempts to enrich herself, her family and friends at Pastor Lindstedt's expense at the instigation of Bryan Reo. The First Amendment is not to be set aside because Bryan Reo doesn't like criticism or because Bryan Reo pressured its wife to do so because she doesn't want children.

63. Plaintiff is not entitled to a permanent injunction in which Defendant is compelled to remove from the World Wide Web and not republish thereto any and all derogatory materials Defendant or Defendant's agents published there about Plaintiff. There isn't much of anything said about the putative Plaintiff Stefani Rossie Reo. What Bryan Reo wrote on its public Quora post has already been removed by Bryan Reo. Not for purpose of privacy but rather through Bryan Reo deceit. Merely asking for this destruction of the First Amendment is proof positive that this litigation by Bryan Reo is for purpose of unjust enrichment & censorship against Lindstedt.

VI. PRAYER FOR RELIEF

Defendant has removed all four of the Bryan Reo, Bryan Reo's wife and father's litigation meant to steal Pastor Lindstedt's inheritance from Lake County to this federal district court where it is presently in four separate federal cases. Pastor Lindstedt has "borrowed" much from Bryan Reo's four fraudulent and abusive frivolous civil complaints and turned it around in this, Pastor Lindstedt's Amended Answer and Counter-Complaint. Pastor Lindstedt is only counter-claiming those directly involved in these particular four lawsuits, i.e. Bryan Reo, Bryan Reo's wife and father, Bryan Reo's fellow lawyer friends Kyle Bristow and Brett Klimkowsky.

Pastor Lindstedt is reserving until discovery finds out the causality of other Reo co-conspirators and whether it is a federal question involving the Lake County Courts / Judge Patrick Condon, the State of Ohio and the Federal Government as to whether they are violating Pastor Lindstedt and Pastor Lindstedt's Church's Constitutional Rights and using 42 U.S.C. 1983 civil rights law to do so . . . later. Doubtless Bryan Reo will file numerous Motions to Strike as that is all Bryan Reo is capable of doing. Pastor Lindstedt again requests the ability to file electronically in response to the torrent of Bryan Reo litigation such as the always present Motions to Strike, etc.

WHEREFORE, Defendant Pastor Martin Lindstedt prays that this Court will enter judgment against Plaintiff Stefani Rossi Reo being used by Attorney Bryan Reo (and Bryan Reo co-conspirators) in Defendant's favor in an amount of money that exceeds five hundred thousand dollars (\$500,000.00) for general and special damages, award Defendant punitive damages against Plaintiff in an amount the Court deems just and proper, award Defendant all costs associated with maintaining the instant civil action, award Defendant all pretrial and post-trial interest on any and all monetary relief awarded to Defendant, award Defendant injunctive relief by sanctioning Attorney Bryan Reo from trying to regulate / censor the World Wide Web (Mrs. Reo probably doesn't care what Pastor Lindstedt puts on the Internet about her husband) through this frivolous litigation and to disbar Bryan Reo from being an officer of this award Defendant all other relief to which Defendant is entitled as a matter of law or equity.

Hail Victory!!!

 Pastor CJCC/ANR

Pastor Martin Lindstedt, Defendant

The Church of Jesus Christ Christian / Aryan Nations of Missouri

338 Rabbit Track Road, Granby Missouri 64844 (Tel #) 417-472-6901

(pastorlindstedt@gmail.com)

Certificate of Service

I, Pastor Martin Lindstedt do hereby certify that a true and genuine copy of the foregoing Answer / Counter-Suit / Counter-Claims has been dispatched by United States mail on 3 December 2019 to:

Stefani Rossi Reo with Attorney Bryan Reo as her lawyer, 7143 Rippling Brook Lane, P.O. Box 5100, Mentor Ohio 44061

Plaintiff will endeavor to obtain service upon the following:

Attorney Bryan Reo as her lawyer. 7143 Rippling Brook Lane
P.O. Box 5100, Mentor Ohio 44061

Anthony Dominic Reo with Attorney Bryan Reo as his lawyer, 7143 Rippling Brook Lane, P.O. Box 5100, Mentor Ohio 44061

Attorney Kyle Bristow, Esq. 42383 Garfield Rd, Mt. Clemens MI, PO Box 381164 Clinton Twp 48038

Attorney Brett Allan Klimkowsky, Esq. P.O Box 114, Martin Ohio 43445 (419-360-1738)



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