

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

STEFANI ROSSI REO
Plaintiff,
vs.
MARTIN LINDSTEDT
Defendant.

) | **1:19 CV 2786**
) Case No.
) (Lake County Court of Common
) Pleas No. 19CV001466)
) *Judge Patrick Condon*
) NOTICE OF REMOVAL
) **JUDGE BOYKO**
) **MAG. JUDGE PARKER**

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that Defendant Pastor Martin Lindstedt (hereinafter "Defendant" or "Pastor Lindstedt"), hereby remove to this Court the above-styled action from the Court of Common Pleas of Lake County, Ohio. Removal of the state court action to this Court is proper under 28 U.S.C. §§ 1331, 1367, 1441, and 1446. In support of its Notice of Removal, Defendant states as follows:

I THE COMPLAINT

1. On or about Sept 9, 2019, Plaintiff Stefani Rossi Reo, wife of Attorney Bryan Anthony Reo commenced yet another civil action on behalf of herself and her husband to steal Defendant Pastor Lindstedt's South Dakota inheritance of 1800 acres worth around \$2 million by filing in four separate bogus court actions for "defamation". This state court action is styled as *Stefani Rossi Reo v. Martin Lindstedt*, Case No. 19CV001466. Defendant has removed a previous Lake County action, *Bryan Anthony Reo v. Martin Lindstedt* 19CV001304 and *Bryan Anthony Reo v. Martin Lindstedt* # 19CV001530 to the federal district court (Reo v. Lindstedt 19-cv-2103 & 19-cv-2589) from the Court of Common Pleas of Lake County, Ohio. Another state court action, *Anthony Domenic Reo v. Martin Lindstedt* 19CV001531 has been removed to this federal court as well, to *Reo v. Lindstedt* 19-cv-2615. This is the last of these four

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bogus and fraudulent Bryan Reo and Reo family cases wherein they are “dialing for dollars” removed from Lake County Ohio to this federal court. The plan is to get these frivolous and malicious lawsuits instigated by Bryan Reo out of the Lake County Courts and for Bryan Reo to be punished for filing these cases against Pastor Lindstedt publishing the truth about Bryan Reo and its agent provocateur friends.

2. Defendant finally received the Summons and Complaint via US Mail on Nov. 7, 2019, attached hereto as **Exhibit A**.

3. The Summons and Complaint constitute all pleadings, process and orders served on this removing Defendant in the state court action.

4. The Complaint asserts sundry other claims for largely mythical damages for alleged common-law torts of libel *pe se* and defamation and asks for \$500,000 because of what Defendant Pastor Lindstedt has been saying about Bryan Reo and observations made about Anthony Dominic Reo (father) and Stefani Rossi Reo (wife) during a trial in Lake County Court held on 24-26 June 2019 in which Defendant and Defendant’s Church of Jesus Christ Christian were assessed \$105,000 and \$400 in damages both compensatory and punitive. These cases are now on appeal by both Pastor Lindstedt and Bryan Reo. Bryan Reo claims that the Lake County Court has jurisdiction over what is said over the Internet by Defendant 900 miles away in a different state. This removal is for Bryan Reo’s wife *Stefani Rossi Reo v Martin Lindstedt* 19CV001466.

II. PROCESS FOR REMOVAL

5 Defendant has timely filed this Notice of Removal within 30 days of receipt of the Complaint on 7 Nov. 2019 in accordance with 28 U.S.C. § 1446(b).

6 No other defendants have been named or served at this time.

7. In accordance with 28 U.S.C. § 1446(d), Defendant will promptly serve a copy of this Notice of Removal to Plaintiff upon this case being filed, and *will file* a copy with the Clerk of

the Court of Common Pleas of Lake County, Ohio upon this Removal being docketed. A proposed copy of the Notice of Removal to Federal Court is attached hereto as **Exhibit B**. When this case is duly filed by this Court Pastor Lindstedt will provide both to Plaintiff and the Lake County Court a revised copy with the federal court case number attached. Defendant requests access to electronic filing in these numerous Bryan Reo et. al., v. Lindstedt cases.

III. THIS COURT HAS FEDERAL QUESTION JURISDICTION

8. Plaintiff alleges myriad claims of defamation under his interpretation of common law. However Pastor Lindstedt intends to file a counter-claim against Reo and other Reo co-conspirators under 42 U.S.C § 1983 & 1985 for violations of Pastor Lindstedt's First Amendment rights (and defamation). Therefore, federal question jurisdiction exists over Plaintiff's claims under 28 U.S.C. § 1331 because the resolution of both Plaintiff's and Defendant's claims will require adjudication of disputed questions of federal law.

9. To the extent the Complaint alleges statutory, state common law or other nonfederal claims, this Court has supplemental jurisdiction over any such claims under 28 U.S.C. § 1367 because those claims arise out of the same operative facts as Plaintiff's and Defendant's claims under common law and "form part of the same case or controversy under Article III of the United States Constitution." 28 U.S.C. § 1367(a).

IV. THIS COURT HAS DIVERSITY OF CITIZENSHIP JURISDICTION AS WELL

10. Because Plaintiff's claims arise against a citizen of another state for over \$75000, removal of this entire cause of action is therefore appropriate under 28 U.S.C. §§ 1441(a), (b).

V. PRESERVATION OF DEFENSES

11. By filing this Notice of Removal, Defendant does not waive any defense which may be available to it.

WHEREFORE, Defendant respectfully requests that this Court accept this Notice of Removal and grant it such other and further relief as the Court deems fair and proper.

Hail Victory !!!

22 Nov 2019

Martin Lindstedt Pastor CTC/AN

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)

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