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MAUREEN G. KELLY
LAKE CO. CLERK OF COURT

**STATE OF OHIO
IN THE COURT OF COMMON PLEAS OF LAKE COUNTY
CIVIL DIVISION**

BRYAN ANTHONY REO

P.O. Box 5100
Mentor, OH 44061

Plaintiff,

v.

MARTIN LINDSTEDT

338 Rabbit Track Road
Granby, MO 64844

Defendant.

Case No.
19CV001304
EUGENE A. LUCCI

BRYAN ANTHONY REO

7143 Rippling Brook Lane
Mentor, OH 44060
(P): (440) 313-5893
(E) Reo@ReoLaw.org
Pro se Plaintiff

PLAINTIFF'S COMPLAINT
(JURY DEMAND ENDORSED HEREON)

BRYAN ANTHONY REO (Plaintiff), alleges the following against MARTIN LINDSTEDT (Defendant):

I. INTRODUCTION

1. Plaintiff sues Defendant in the instant civil action for tortious conduct related to Defendant's campaign of cyber harassment and defamation per se against Plaintiff via the World Wide Web.

II. PARTIES

2. Plaintiff is a natural person who resides in Mentor, Lake County, Ohio. For purposes of Plaintiff's causes of action against Defendant, Plaintiff is a non-public figure.

3. Defendant is a natural person of the State of Missouri who resides at 338 Rabbit Track Road, Granby, MO 64844.

III. JURISDICTION AND VENUE

4. This Court enjoys subject matter jurisdiction over the instant civil action because the amount in controversy exceeds five hundred dollars (\$500.00). R.C. § 2305.01.

5. This Court enjoys personal jurisdiction over Defendant because Defendant caused tortious injury to Plaintiff in the State of Ohio by an act outside of the State of Ohio that was committed by Defendant with the purpose of injuring Plaintiff when Defendant might reasonably have expected that Plaintiff would be injured in the State of Ohio. R.C. § 2307.382(A)(6); Civ.R. 4.3(A)(9); *Kauffman Racing Equip., L.L.C., v. Roberts*, 126 Ohio St.3d 81, (Ohio 2010) (holding that a non-commercial website intentionally used to defame an Ohio resident provides Ohio courts personal jurisdiction over foreign tortfeasor). Defendant has also regularly come to Lake County Ohio for purposes of further harassing and defaming Plaintiff [including defaming him at the Lake County Bar Association in Painesville], and Defendant was at one time subjected to a civil protection stalking order restraining him from contacting Plaintiff.

6. Venue is proper with this Court because Plaintiff resides in Lake County, State of Ohio, and the Court's personal jurisdiction over Defendant exists via Civ.R. 4.3. Civ.R. 3(B)(7).

IV. STATEMENT OF FACTS

7. Defendant has a long history of libeling Plaintiff and Defendant lost a jury trial in the consolidated cases of 16CV000825 and 15CV001590 with a verdict being rendered in Plaintiff's favor 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 \$105,000.00 against Defendant Martin Lindstedt.

8. On September 9, 2018 Defendant published on the worldwide web a statement that Plaintiff was using Lake County Court of Common Pleas for purposes of "barratry."

See- <http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=18592#post18592>

9. Barratry is defined as the use of vexatious litigation or the incitement to it.

10. Barratry is unprofessional conduct per the Ohio Rules of Professional Conduct.

11. Vexatious litigation is defined by the Ohio Revised Code.

12. An allegation of vexatious litigation and barratry is an allegation of unprofessional conduct if not criminal conduct.

13. Plaintiff has never engaged in barratry or vexatious litigation and was not engaged in either during the proceedings in question, those proceedings being 16CV000825 and 15CV001590.

14. On September 14, 2018, Defendant published a defamatory document on the worldwide web stating that Plaintiff had engaged in stalking, was a homosexual, and was stalking a man for purposes of coercing homosexual sex from the man. Defendant also claimed that Plaintiff had engaged in criminal stalking of Defendant. Stalking is a crime as defined by the Ohio Revised

Code, 2903.211, and a statement meant as a factual assertion that Plaintiff was committing said crimes is defamatory per se. Plaintiff never stalked Defendant nor the third parties whom Defendant claimed Plaintiff was stalking. Plaintiff is not a homosexual, has never had homosexual sex, and has never attempted to coerce or blackmail homosexual sex from any individual.

See- <http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=18615#post18615>

15. On September 17, 2018 Defendant posted on the worldwide web, referring to the then presiding judge as “crooked” which is relevant to the extent that Defendant would later claim that Plaintiff was in collusion with the trial court judge and was conspiring with the judge to corrupt the proceedings of the jury trial conducted June 24-26 of 2019. Plaintiff was never in collusion with any judge, never conspired with any judge, and never worked to corrupt any proceedings. Accusations that Plaintiff engaged in such conduct would be highly defamatory because they would be accusations of criminal conduct and accusations that Plaintiff violated the Rules of Professional Conduct.

See- <http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=18624#post18624>

16. On October 2, 2018, Defendant posted on the worldwide web, using Plaintiff’s name to make the post, a copy of an affidavit Plaintiff had submitted, in support of a motion for summary judgment, in the consolidated 16CV000825 and 15CV001590 case and declared that the affidavit was perjury. The affidavit contained only truthful statements and there were no perjured

statements in the affidavit. A statement meant as a factual assertion that Plaintiff violated R.C. 2921.11 is defamatory per se because it is an allegation of criminal conduct and violation of the rules of professional conduct.

See- <http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=18707#post18707>

17. On October 15, 2018, Defendant posted on the worldweb wide, using Plaintiff's name to make the post, allegations and statements that Plaintiff was conspiring with then presiding Lake County Judge Collins to submit perjured filings for the purpose of barratry. A statement meant as a factual assertion that Plaintiff violated R.C. 2921.11 is defamatory per se because it is an allegation of criminal conduct and violation of the rules of professional conduct.

See- <http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=18752#post18752>

18. On October 25, 2018 Defendant posted on the worldwide web, using Plaintiff's name to make the post, allegations that Plaintiff had filed a "frivolous" federal lawsuit which Defendant implied had been dismissed by virtue of being determined and judged frivolous. Said lawsuit involved Plaintiff and Defendant, the parties were the same, and Defendant was well-aware that the lawsuit was dismissed without prejudice for lack of subject matter jurisdiction, it was never adjudicated on the merits, and no findings were ever made that even suggested the lawsuit was frivolous. A statement meant as a factual assertion that Plaintiff had brought a frivolous lawsuit in violation of the Rules of Civil Procedure and the Rules of Professional Conduct would be an allegation of unprofessional conduct and would be defamatory per se. Defendant also cast the

circumstances surrounding the federal lawsuit in false light and presented them in such a way that an ordinary observer or reader might find Plaintiff highly offensive if the observer came to believe Defendant's false light story that the lawsuit had been dismissed for having been deemed frivolous.

See- <http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=18787#post18787>

19. On November 8, 2018, Defendant posted on the worldwide web, using Plaintiff's name to make the post, statements meant as factual assertions that Plaintiff had requested a continuance in the then ongoing consolidated 15CV and 16CV case, for the purpose of going to Paraguay to obtain sex reassignment surgery on the basis that Defendant was claiming Plaintiff was a mentally ill homosexual. An allegation that a professional, specifically an attorney, is mentally ill, is an allegation that he is unfit to perform the duties of his trade or his profession and would cause potential clients and other attorneys to doubt his fitness to practice law. Plaintiff is not mentally ill, Plaintiff has never sought sexual reassignment surgery, and Plaintiff is neither a homosexual nor a transsexual nor does Plaintiff have any personality disorder, mood disorder, thought disorder, or mental illness as defined by the current or previous versions of the DSM. Defendant's allegations constituted defamation per se.

See- <http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=18858#post18858>

20. On November 11, 2018 Defendant posted on the worldwide web, using Plaintiff's name to make the post, statements meant as factual assertions that Plaintiff, who is married, was

having extra-marital homosexual sex, with fellow attorneys throughout Ohio and Michigan. Allegations of marital infidelity and allegations of sex with colleagues and other attorneys are allegations of unprofessional or immoral conduct that would cause Plaintiff to be seen in a highly negative light. Defendant also linked to Plaintiff's Avvo profile and posted the phone number and name of Plaintiff's law practice, along with Plaintiff's name so there was no doubt as to whom Defendant was referring. The allegations were completely untrue.

See-<http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=18872#post18872>

21. Defendant continued to post defamatory content against Plaintiff throughout the rest of 2018 and into 2019.

22. On June 26, 2019, Defendant posted on the worldwide web, under the name of Lake County Court Administrator the false statement that Defendant Pastor Martin Lindstedt had prevailed against Bryan Reo on a counterclaim of libel per se and that the jury found in favor of Martin Lindstedt in regards to the counterclaim alleging that Bryan Reo defamed Martin Lindstedt as a child molester and a pedophile. The jury actually found for Plaintiff Bryan Anthony Reo *against* Martin Lindstedt as to that counter-claim, see attached Exhibit 1, copy of judgment from the consolidated 15CV and 16CV case that was tried 6/24/2019 to 6/26/2019 and resulted in the jury verdict as provided in the judgment.

See- <http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=19923#post19923>

23. On July 8, 2019, Defendant posted on the worldwide web, using Plaintiff's name, the allegation that Plaintiff colluded with and conspired with Judge Patrick Condon of the Lake County Court of Common Pleas to pervert the proceedings of the jury trial in the consolidated 15CV and 16CV case, for the purpose of "lynching" Defendant. Plaintiff never colluded with Judge Condon, or any judge, Plaintiff never conspired with Judge Condon or any judge, and Plaintiff did nothing to pervert the proceedings or to improperly influence the jury. Allegations that Plaintiff conspired with a judge and colluded with the presiding judge in a jury trial to influence and corrupt the proceedings are allegations of criminal conduct and unprofessional conduct and constitute defamation per se. Defendant also made claims that Plaintiff conspired and colluded with Judge Condon, with these claims being communicated via a webcast video broadcast made on June 26 and June 27, 2019 in the aftermath of the trial that concluded June 26, 2019.

See- <http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=20008#post20008>

24. Defendant has caused injury to Plaintiff in excess of five hundred thousand dollars (\$500,000.00).

V. TRIAL BY JURY DEMANDED

25. Plaintiff 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

26. The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

27. Defendant published false and defamatory statements about Plaintiff to third-parties via the medium of the World Wide Web.

28. Defendant's false and defamatory statements about Plaintiff were made by Defendant without privilege.

29. Defendant acted with at least negligence in making false and defamatory statements about Plaintiff.

30. Defendant failed to act reasonably in attempting to discovery the truth or falsity or defamatory character of Defendant's publication about Plaintiff.

31. Defendant's false and defamatory statements about Plaintiff are defamatory per se insofar as said statements reflect upon the character of Plaintiff by bringing him into ridicule, hatred, or contempt, and affects Plaintiff injuriously in his future trade or profession.

32. Defendant's false and defamatory statements about Plaintiff are defamatory per se to the extent that most of the statements in question are allegations or accusations of criminal conduct in violation of various sections in the Ohio Revised Code. Other allegations are defamatory per se to the extent that they are allegations of conduct that would constitute violations of the Rules of Professional Conduct.

33. Defendant committed against Plaintiff the common law tort of libel per se.

COUNT II
COMMON LAW INVASION OF PRIVACY – FALSE LIGHT

34. The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

35. Defendant made false and derogatory statements about Plaintiff that Defendant publicized via the medium of the World Wide Web.

36. The false and derogatory statements made by Defendant about Plaintiff placed Plaintiff before the public in a false light.

37. The false and derogatory statements made by Defendant about Plaintiff are highly offensive to a reasonable person.

38. Defendant is at fault and knew or acted with recklessness as to the truth of the statements made by Defendant that concern Plaintiff.

39. As a direct and proximate result of Defendant's statements about Plaintiff, Plaintiff has been and will continue to suffer damages in the form of mental anguish and reputational injury.

40. Defendant committed against Plaintiff the tort of invasion of privacy – false light.

COUNT III
COMMON LAW INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

41. The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

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

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

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

45. Lindstedt is liable to Plaintiff for common law intentional infliction of emotional distress.

COUNT IV

PUNITIVE DAMAGES

46. The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

47. Defendant's conduct was conscious, deliberate, intentional, and/or reckless in nature.

48. Defendant's conduct was undertaken with hatred, ill will, and/or vexation.

49. Defendant's conduct was done with a conscious disregard for the rights of Plaintiff and has a great probability of causing Plaintiff substantial harm for many years.

50. Plaintiff previously sued Defendant, and prevailed in the consolidated 15CV and 16CV case, with an award of \$105,400 being granted to Plaintiff against Defendant Lindstedt and his Aryan Nations Church. Since the rendering of that verdict Defendant has continued to libel and defame Plaintiff and has taken to publishing defamatory content that Plaintiff colluded and conspired with the presiding trial court judge, Judge Condon, to pervert the proceedings. Clearly a judgement of \$105,400 is not an adequate deterrent to continued defamation by a defendant who has a net worth of approximately \$2,000,000 dollars in terms of agricultural land holdings separate and distinct from his primary residence. Substantial punitive damages are warranted to cause Defendant to feel the consequences of his behavior, to punish him for the tortious behavior, to stop the tortious behavior, and to deny him the resources to continue being able to commit further intentional torts against Plaintiff.

51. Plaintiff is entitled to punitive damages from Defendant.

COUNT V PERMANENT INJUNCTION

52. The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.

53. Some or all of the improper and unlawful conduct of Defendant is continuing and will continue in the future absent injunctive relief from the Court, and Plaintiff will continue to be damaged by the same.

54. In the absence of the entry of a permanent injunction by the Court, Plaintiff will suffer serious and irreparable harm and injury, including but not limited to damage to Plaintiff's reputation.

55. The entry of a permanent injunction will not unduly harm or burden Defendant because Defendant is required as a matter of law to refrain from tortiously harming Plaintiff's reputation via the World Wide Web.

56. Public policy favors the entry of a permanent injunction because such relief will prevent unlawful conduct and will preserve and protect Plaintiff's reputation from further injury.

57. Plaintiff has no adequate remedy available at law unless he is expected to continue to file civil actions against Defendant each and every time Defendant further defames Plaintiff.

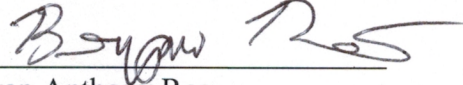
58. Plaintiff is entitled to a permanent injunction in which Defendant is compelled to remove from the World Wide Web and not republish thereto any and all derogatory materials Defendant or Defendant's agents published there about Plaintiff.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that this Court will enter judgment against Defendant Martin Lindstedt in Plaintiff's favor in an amount of money that exceeds five hundred thousand dollars (\$500,000.00) for general and special damages, award Plaintiff punitive damages against Defendant in an amount the Court deems just and proper, award Plaintiff all costs associated with maintaining the instant civil action, award Plaintiff all pretrial and post-trial interest on any and all monetary relief awarded to Plaintiff, award Plaintiff injunctive relief by ordering

Defendant to remove from the World Wide Web and not republish thereto derogatory or invasive materials about Plaintiff that Defendant or Defendant's agents published about Plaintiff, and will award Plaintiff all other relief to which Plaintiff is entitled as a matter of law or equity.

Respectfully submitted,



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Pro se Plaintiff

JURY DEMAND ENDORSED HEREON

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