

Proposed Notice of Removal
of Stefani Neo v. Martin Lindstedt
to Federal Court under
^{19CV001466 Lake County}
Neo Plaintiffs v. Martin Lindstedt
19-cv-2103

(if this federal court allows this
without payment of \$400 docket
fee)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

STEFANI ROSSI REO)	
Plaintiff,)	Case No. 19-cv-2103 (Reo cases)
	,	(Lake County Court of Common
)	Pleas No. 19CV001466)
vs.	,	
	,	
MARTIN LINDSTEDT)	NOTICE OF REMOVAL
	,	
Defendants.)	
	,	

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, with this federal court's permission thus no docket fee necessary in order to consolidate the Reo Plaintiffs vs Martin Lindstedt case 19-cv-2103 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 September 9, 2019, Attorney Bryan Anthony Reo on behalf of its wife Stefani Rossi Reo commenced a civil action on behalf of herself by filing the state court action styled as *Steffani Rossi Reo v. Martin Lindstedt*, Case No. 19CV001466 in the Court of Common Pleas of Lake County, Ohio.

2. Defendant has not received the Summons and Complaint of Sept 9, 2019, attached hereto as **Exhibit A**, but does know about it and has a copy except for the summons. Defendant asks the federal court to join this Reo Plaintiff litigation to existing federal litigation in Reo v. Lindstedt 19-cv-2103 and for it thus being a consolidation of the endless Reo litigation to not have to pay another \$400 to Remove this to the federal court .

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

4. The Complaint asserts claims for 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 Stefani Reo after 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 and post-trial motions. 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. Pastor Lindstedt has been fighting with Bryan Reo since 2010 when Reo was trying to infiltrate the White Supremacy and Christian Identity Movements. Bryan Reo is not a private figure but rather at least a limited-purpose public figure or public figure. Bryan Reo has made it quite clear that he intends to use his influence before the Lake County Courts to get another judgment against Pastor Lindstedt based upon his notions of what the common-law says. Bryan Reo has filed another lawsuit on 9 Sept 2019 in Lake County on behalf of his wife for \$500,000 under the same guise. Before Pastor Lindstedt is served with it Pastor Lindstedt is trying to add that spurious litigation to be removed to this current removed case.

II. PROCESS FOR REMOVAL

5 Defendant has timely filed this Notice of Removal within 30 days of receipt of the Complaint which is now being mailed to Pastor Lindstedt 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. 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.

III. THIS COURT HAS FEDERAL QUESTION JURISDICTION

8. Plaintiff Mrs. Reo alleges claims under Bryan Reo's 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. 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 !!!

Martin Lindstedt Pastor
Pastor Martin Lindstedt, 338 Rabbit Track Road, Granby Missouri 64844

28 Sept 2019

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

Exhibit # A

FILED

2019 SEP -9 PM 2:58
IN THE COURT OF COMMON PLEAS OF LAKE COUNTY
LAKE CO. CLERK OF COURT
STATE OF OHIO
CIVIL DIVISION

STEFANI ROSSI REO
P.O. Box 5100
Mentor, OH 44061

19CV001466
PATRICK J. CONDON

Plaintiff,

v.

MARTIN LINDSTEDT
338 Rabbit Track Road
Granby, MO 64844

Defendant.

REO LAW LLC
Bryan Anthony Reo (#0097470)
P.O. Box 5100
Mentor, OH 44061
(B): (216) 505-0811
(P): (440) 313-5893
(E): Reo@ReoLaw.org
Attorney for Stefani Rossi Reo

PLAINTIFF'S COMPLAINT
(JURY DEMAND ENDORSED HEREON)

STEFANI ROSSI 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).

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'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.

8. 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").

9. 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.

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

11. 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.

12. Plaintiff is not a transgender, not a prostitute, and has proper female genitalia.

13. Plaintiff's husband is not a homosexual.

14. 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.

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

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

17. 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.

18. 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.

19. Plaintiff has never been charged with any crime.

20. Plaintiff has never committed any act of prostitution.

21. 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.

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

V. TRIAL BY JURY DEMANDED

23. 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

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

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

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

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

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

29. 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.

30. 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. Statements that impugn the chastity of a woman are also defamatory per se.

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

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

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

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

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

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

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

37. 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.

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

**COUNT III
COMMON LAW INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

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

40. 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.

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

42. 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.

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

**COUNT IV
PERMANENT INJUNCTION**

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

45. 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.

46. 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.

47. 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.

48. 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.

49. 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.

50. 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,



Bryan Anthony Reo

P.O. Box 5100

Mentor, OH 44061

(P): (440) 313-5893

(E): Reo@ReoLaw.org

Attorney for Plaintiff Stefani Rossi Reo

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.

COMMON PLEAS COURT

LAKE COUNTY OHIO

Case Designation Form (Loc

STEFANI ROSSI REO

2019 SEP -9 PM 2:58

19CV001466

Case No. _____

PATRICK J. CONDON

VS

MARTIN LINDSTEDT

LAKE CO. CLERK OF COURT

Judge _____

Per Loc. R. II (C)(3), refiling of cases previously dismissed under Civ.R. 41 must have a designation upon the face of the complaint that the action is being refiled. The word "REFILING" must appear in capital letter under the word "COMPLAINT". Directly beneath the word "REFILING" the complaint shall identify the case number of this dismissed action. Former case no. _____

Case Categories: (Mark one category only)

- Administrative Appeal (Specific ORC Sec.) Section: _____
- Consumer Action - ORC 1345
- Contract or Quasi Contract
- Criminal
- Declaratory Judgment
- Foreclosure
- Foreign Judgment
- Malpractice (specify) _____
- Credit Card (CI)
- Personal Injury
- Product Liability
- Professional Tort
- Provisional Remedy (Replevin, Attachment, Garnishment)
- Workers Compensation
- Other Tort Defamation/Libel per se _____
- Other Civil _____

The designation "money only" may not be used if one of the above specific categories is applicable. Further, the caption shall note any statutory provision this is unique to the particular cause and controls the time within which the case is to proceed, once filed. (Ex. Miscellaneous - Contest of Election (O.R.C. Section 3515.10 - Hearing within 30 days.)

Revised Code Section unique to this particular cause which controls the time within which the case is to proceed: _____



(Signature)

Bryan Anthony Reo 0097470

(Printed name and Registration No.)

REO LAW LLC. P.O. Box 5100 Mentor, Ohio 44061

(Firm Name and Address)

440-313-5893

(Telephone Number)

MAUREEN G. KELLY

CLERK OF COURTS

Lake County Common Pleas Court

ATTENTION ALL PARTIES TO THE CASE

Whether you are represented by an Attorney or representing yourself in this Legal action, LAKE COUNTY LOCAL COURT RULES require that all participants familiarize themselves with, and follow the requirements of each court.

**Pre-trial orders and procedures are available on our website
at**

www.lakecountyohio.gov/coc

Select DOWNLOADS

Scroll to PRE-TRIAL ORDERS

**Select the appropriate pre-trial order/procedure for YOUR
respective case and Judge.**

**If you are unable to access or unclear as to which pre-trial
order/procedure applies to you, contact the Office of the Clerk
of Courts, New Case Department (440.350.2657) during
normal business hours and a copy will be immediately
mailed to you.**

Maureen G. Kelly, Clerk of Courts

Revised 7/1/2013 Pretrial orders

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

STEFANI ROSSI REO)	Case No.
Plaintiff,)	(Lake County Court of Common
	,	Pleas No. 19CV001466)
vs.	,	
	,	
MARTIN LINDSTEDT)	NOTICE OF REMOVAL
	,	
Defendants.)	
	,	

NOTICE OF REMOVAL TO FEDERAL COURT

PLEASE TAKE NOTICE that Defendant Pastor Martin Lindstedt (hereinafter "Defendant" or "Pastor Lindstedt"), filed, after being requested and granted by the federal court on _____, ___ 2019, in the United States federal court for the Northern District of Ohio its Notice of Removal for the above-captioned case. For the above-captioned case, hereby remove to this Court the above-styled action from the Court of Common Pleas of Lake County, Ohio.

Hail Victory !!!

Martin Lindstedt Pastor
 Pastor Martin Lindstedt, 338 Rabbit Track Road, Granby Missouri 64844



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

Exhibit B – to be filed before Lake County Court & Plaintiff once Notice of Removal is Filed