

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

BRYAN ANTHONY REO

Plaintiff,

vs.

MARTIN LINDSTEDT

Defendants.

1:19 CV 2103

Case No.  
(Lake County Court of Common  
Pleas No. 19CV001304)

NOTICE OF REMOVAL

JUDGE OLIVER

FILED  
19 SEP 12 PM 3:46  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
COLUMBUS, OHIO

MAG. JUDGE GREENBERG

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 August 12, 2019, Plaintiff Bryan Anthony Reo commenced a civil action on behalf of himself by filing the state court action styled as *Bryan Anthony Reo v. Martin Lindstedt*, Case No. 19CV001304 in the Court of Common Pleas of Lake County, Ohio.

2. Defendant received the Summons and Complaint on August 21, 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 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 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. When Pastor Lindstedt is served with it Pastor Lindstedt will try 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 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 alleges claims 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. 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 !!!

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

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