

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

BRYAN ANTHONY REO,

Plaintiff,

v.

MARTIN LINDSTEDT,

Defendant.

Case No. 1:19-cv-02103-SO

Hon. Solomon Oliver, Jr.

REO LAW, LLC

Bryan Anthony Reo (#0097470)

P.O. Box 5100

Mentor, OH 44061

(T): (440) 313-5893

(E): reo@reolaw.org

Pro se Plaintiff

MARTIN LINDSTEDT

338 Rabbit Track Road

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Pro se Defendant

**PLAINTIFF BRYAN ANTHONY REO’S VERIFIED MOTION FOR ORDER
COMPELLING DEFENDANT MARTIN LINDSTEDT TO SHOW CAUSE AS TO WHY
HE SHOULD NOT BE HELD IN INDIRECT CIVIL CONTEMPT OF COURT**

NOW COMES Bryan Anthony Reo (“Plaintiff”), *pro se*, and hereby propounds upon Martin Lindstedt (“Defendant”) and this Honorable Court Plaintiff Bryan Anthony Reo’s Verified Motion For Order Compelling Defendant Martin Lindstedt To Show Cause As To Why He Should Not Be Held In Indirect Civil Contempt Of Court:

1. On September 28, 2020, the Court issued its Order which pertinently granted a permanent injunction which forever enjoins Defendant to “(1) cease and desist from making or publishing statements regarding Plaintiff’s lawsuits, legal practice, and business dealings that are the same, or significantly similar, in nature to the statements the court has found to be defamatory in this case; and (2) to the fullest extent possible, Defendant shall remove or cause to be removed from

all websites and publications all statements Defendant has made that this court has found to be defamatory, as well as any statements similar in nature published during or before the current proceedings regarding Plaintiff's lawsuits, legal practice, and business dealings." (ECF No. 44, PageID. # 494).

2. Defendant has actual knowledge of the Court's September 28, 2020, Permanent Injunction; to wit: on September 28, 2020, Defendant posted on Defendant's website at <http://www.whitenationalist.org/forum/showthread.php?2175-Bryan-Reo-v-Martin-Lindstedt-19CV001304&p=21830#post21830> an offensive screed which references the Court having given "summary judgment to Ol' Niggerlips":

Pastor Lindstedt finds out just as Atonement ends that the federal nigger judge gives a summary judgment to Ol' Niggerlips

* * *

Just as the Day of Atonement was about to end this reporter from the Cleveland Plain Dealer called me up and **asked my opinion on this federal judge's giving summary judgment to Ol' Niggerlips / Bryan Reo** of the ZOGbot Poverty [F]Law Center.

Upon finding out that it was the Solomon Oliver case I of course said that I'd file a Rule 59(e) Motion to Reconsider. I pointed out that as probably the only real open White Supremacist -- a "White Nationalist" is a ZOGling whigger, jew or mamzer pussy too chickenshit to admit that White People shouldn't have to live in the same country as non-whites and jews claiming that they want a "pissful separation" to be given them by ZOG/Babylon as opposed to gaining it the old fashioned way through civil war and genocide.

Of course I was thoroughly racist in promoting racism. The reporter said that he couldn't repeat verbatim what I said. I said that this was exactly the position of the Daily Capital Journal of Pierre South Dakota. But everything I said was on the record and by the way I was recording this as well. So we'd see what was got.

I pointed out that what was it to me if a nigger judge destroyed the Myth of the First Amendment. My position is that a Satanic mamzer faggot ZOGbot Abomination could have stopped fighting with me back when I found out that "SwordBrethren" was none other than Bryan Reo of Mentor Ohio. Ol' Niggerlips (my nickname for Bryan Reo as what non-white pretend White Supremacist calls itself Ol' Niggerlips

-- a shitskinned slant-eyed unibrowed jewboy mamzer faggot playing at White Supremacist that's what) even won a gag order and they will be holding a hearing for "damages."

My position is that NorthEastern Ohio needs to be destroyed absolutely. I think within the next few years that White Supremacist Warlords can chernobylyze the North Perry Nuclear Power Plant by cutting off the water and fuel supply and causing this aging reactor to melt down just to show that us Warlords mean business. None of us budding White Supremacist warlords running local theocratic military dictatorships can afford to let Northeastern Ohio exist, certainly not as an antifa shithole which drags Aryan Nations pastors and their Churches to face trial by nigger and gliberal whigger lynch mob jurors. Every single pig, lawyer, judge, plutocrat and politician that refuses to live and let live needs to be exterminated, along with the majority of the population with the rest enslaved.

The thirty-eight minute interview with the reporter is recorded below.

http://bryanreo-lawsuits.xyz/Reo_19C...8Sep20_7pm.mp3

Pastor Martin Luther Dzerzhinsky Lindstedt
Church of Jesus Christ Christian / Aryan Nations of Missouri
Write-in Candidate for Governor of Missouri

(Emphasis added.)

3. Defendant is willfully acting in violation of the Court's September 28, 2020, Permanent Injunctive Order; to wit: (1) Defendant in fact knows about the September 28, 2020, Permanent Injunction; (2) Defendant has not removed from Defendant's websites of <<http://www.whitenationalist.org/forum>> and <<http://bryanreo-lawsuits.xyz>> statements Defendant has made regarding Plaintiff's lawsuits, legal practice, and business dealings that are the same, or significantly similar, in nature to the statements the court has found to be defamatory in the instant civil action; and (3) Defendant has continued to publish on Defendant's websites of <<http://www.whitenationalist.org/forum>> and <<http://bryanreo-lawsuits.xyz>> false and disparaging statements regarding Plaintiff's lawsuits, legal practice, and business dealings that are the same, or significantly similar, in nature to the statements the court has found to be defamatory in the instant civil action.

4. A simple search conduct at 12:24 p.m. on January 1, 2021, of “Bryan Reo” on Defendant’s <<http://www.whitenationalist.org/forum>> website reveals that there are 117 different threads currently accessible online that contain said search term. (Exhibit 1 – Screenshot of Defendant’s Website’s Search Results). Most, if not all, of these threads contain statements Defendant has made regarding Plaintiff’s lawsuits, legal practice, and business dealings that are the same, or significantly similar, in nature to the statements the court has found to be defamatory in the instant civil action.

5. Defendant writes as a matter of routine obscenely offensive slurs about Plaintiff in Defendant’s court filings, and Defendant then—also as a matter of routine—publishes PDFs of said court filings onto Defendant’s website of <<http://bryanreo-lawsuits.xyz>> so that third-parties can view the same. Hyperlinks to the downloadable links to <<http://bryanreo-lawsuits.xyz>> are routinely published by Defendant in the posts on Defendant’s <<http://www.whitenationalist.org/forum>> website. Said postings by Defendant remain online.

6. Although courts possess an inherent power to enforce obedience to their orders so that they may properly perform their functions, *Myers v. United States*, 264 U.S. 95, 103 (1924), the federal courts’ contempt power is limited by 18 U.S.C. § 401 and by Fed. R. Crim. P. 42. See *United States v. Wilson*, 421 U.S. 309, 315 n. 6 (1975); *Nye v. United States*, 313 U.S. 33, 45 (1941). Accordingly, all forms of contempt, whether they be criminal, civil, indirect or direct, must fall within one of the three categories of misbehavior described in 18 U.S.C. § 401. Indirect contempts come within 18 U.S.C. § 401(2) or (3), and the “so near thereto clause” of 18 U.S.C. § 401(1).

7. Attached to this Motion is Plaintiff’s Declaration, which is incorporated by reference as if fully set forth herein. (Exhibit 2 – Declaration of Bryan Anthony Reo).

8. Defendant can and should be held in indirect civil contempt of court and punished accordingly.

9. This Motion is made pursuant to 18 U.S.C. § 401(1) and (3).

WHEREFORE, Plaintiff prays that this Honorable Court will issue an order to compel Defendant to show cause as to why Defendant should not be held in indirect civil contempt of court and punished accordingly. Plaintiff proposes that if Defendant is found to be held in indirect civil contempt of court, that Defendant be provided 72 hours to become compliant with the Court's September 28, 2020, Permanent Injunction, and if Defendant refuses to purge himself of his contemptuous behavior, that Defendant be indefinitely jailed until he becomes so compliant. Also, Plaintiff proposes that the Court exercise its inherent powers by putting Defendant in default as a sanction, and that an evidentiary hearing to determine Plaintiff's unliquidated damages take place without a jury—which would be permitted by Fed. R. Civ. P. 55(b)(2)(B)—so as to allow the case to expeditiously proceed to final judgment.

Respectfully submitted,

REO LAW, LLC

/s/ Bryan Anthony Reo
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P.O. Box 5100
Mentor, OH 44061
(T): (440) 313-5893
(E): reo@reolaw.org
Pro se Plaintiff

Dated: January 1, 2021

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MARTIN LINDSTEDT

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(T): (417) 472-6901
(E): pastorlindstedt@gmail.com
Pro se Defendant

CERTIFICATE OF SERVICE

I, Bryan Anthony Reo, affirm that I am a party to the above-captioned civil action, and on January 1, 2021, I served a true and accurate copy of Plaintiff Bryan Anthony Reo's Verified Motion For Order Compelling Defendant Martin Lindstedt To Show Cause As To Why He Should Not Be Held In Indirect Civil Contempt Of Court and this Certificate of Service upon Martin Lindstedt, 338 Rabbit Track Road, Granby, MO 64844, by placing the same in a First Class postage-prepaid, properly addressed, and sealed envelope and in the United States Mail located in City of Mentor, Lake County, State of Ohio.

/s/ Bryan Anthony Reo
Bryan Anthony Reo (#0097470)
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Mentor, OH 44061
(T): (440) 313-5893
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Pro se Plaintiff

Dated: January 1, 2021