

**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.

Mag. Thomas M. Parker

PLAINTIFF'S MOTION TO STRIKE  
DEFENDANT'S RESPONSE TO MOTION  
TO DISMISS  
[ALL CASES]

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**MARTIN LINDSTEDT**

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*Pro se Defendant*

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**PLAINTIFFS' MOTION TO  
STRIKE DEEFNDANT'S RESPONSE TO MOTION TO DISMISS**

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NOW COMES Bryan Anthony Reo ("Plaintiff") in 1:19-cv-2589, 1:19-cv-2103, and Counsel for Plaintiffs in 1:19-cv-2786 and 1:19-cv-2615, and hereby propounds upon Martin Lindstedt ("Defendant") and this Honorable Court Plaintiffs Motion to Strike Defendant's Response to Motion to Dismiss (ECF No. 111)

This motion is made pursuant to Fed. R. Civ. P. 12(f) on the basis that Defendant's filing is so outrageously offensive, scandalous, irrelevant, immaterial and impertinent, it should be stricken. Furthermore, Defendant continues to violate standing orders issued by this Court regarding the case caption, and he purports to join a third-party corporate entity into this case

which he then advocates on behalf of, despite being repeatedly warned (including a verbal warning on 18 May 2023 by the Magistrate Judge at the Case Management Discovery Dispute Conference).

Defendant's document should be stricken for several reasons.

1. **Unauthorized practice of law, Defendant is again illegally practicing law on behalf of a corporate entity** despite Defendant not being a licensed attorney admitted to practice law before this Court and the Court already ordering Defendant to not so practice law. (Doc. 19, PageID ## 195-195) "But the court grants Plaintiff's Second Motion to the extent it asks the court to strike Defendant's assertion that he represents not only himself but also his Church of Jesus Christ Christian/Aryan Nations of Missouri. Ohio law forbids a non-lawyer like Defendant from representing a corporate entity. See *Disciplinary Counsel v. Givens*, 832 N.E.2d 1200, 1202 (Ohio 2005)." Defendant has once again joined a non-party "Church of Jesus Christ Christian Aryan Nations of Missouri" into this action (this is far from the first time Defendant has done this, even doing this repeatedly in this and the other consolidated cases). Defendant engages in unauthorized practice of law by including a corporate entity in the signature block and stating that he is appearing "of" that corporate entity. Defendant captions the pleading "DEFENDANTS" and references "DEFENDANTS" with the corporate entity Church of Jesus Christ Christian Aryan Nations of Missouri from the case while alleging in the opening paragraph that he is appearing "of the church." Defendant was explicitly warned against further attempts at unauthorized practice of law on 18 May 2023 by the honorable Magistrate Judge Thomas Parker at the Case Management Discovery Dispute Conference. The Magistrate Judge expressly told Defendant that the laws of Ohio prohibit Defendant from representing or engaging in law practice or advocacy on behalf of

the Church of Jesus Christ Christian Aryan Nations of Missouri, to which Defendant acknowledged the prohibition and stated he simply disagreed with the law and did not support or believe in said law. It is obvious that Defendant is able to comprehend and understand the law and his duties under the law, but has no regard for having to obey the law because he consciously chooses to disregard those laws that he does not agree with. This is not a matter of an unsophisticated pro se who lacks a legal understanding, this is a matter of a man who understands what is expected of him and elects to do whatever he pleases instead.

2. **Defendant is flagrantly disobeying the Order** entered by this Court on 10 April 2023 (ECF No. 90) which provided an exact template of the case caption/title block to be used.

3. **Defendant's filing is scandalous** and uses language such as "non-white, non-heterosexual" makes irrelevant references to the Ku Klux Klan, and talks about Defendant Lindstedt's desire to attack nuclear power plants, shopping malls, churches, and schools (ECF No. 111, PageID # 1135). Further, Defendant refers to Plaintiff Bryan Reo as a "Butthurd homosexual." (ECF No. 111, PageID # 1137)

4. **Defendant's filing fails to provide any legal or factual basis** by which his counter-claims should \*not\* be dismissed, but rather brags that "Pastor Lindstedt uses these Reo cases as a soapbox to spread hatred, division, and to justify terrorism." (ECF No. 111, PageID # 1136) This is not a proper purpose for a legal pleading or legal process. It is not the duty of a Court to find and construct Defendant's arguments for him. *Cardone v. Cardone*, (9th App. Dist. No. 18349) 1998 Ohio App. LEXIS 2028.

5. **Defendant has failed to meet the relevant burdens for pleading standards** in so much that that he has clearly failed to state legally cognizable claims and sufficiently pled such claims as counter-claims, he has not even bothered to address the matter of whether or not his claims for spoliation of evidence should be dismissed per Plaintiffs' Fed. Civ. R. 12(b)(6) motion, and thus those claims can be treated as abandoned.

Defendant has not even briefed the substance of the matter in issue raised by Plaintiffs' 12(b)(6) motion, and has opted to use his brief as a platform to spew obscene rhetoric and issue explicit death threats while bizarrely joining the Aryan Nations of Missouri into this action after being repeatedly and expressly told to refrain from doing so. This must rightly be seen as a clear attempt by Defendant to hinder and delay these proceedings.

WHEREFORE, Plaintiff prays that this Honorable Court will:

- A. Strike Defendant's Response to Bryan Reo's Motion to Dismiss (ECF No. 111);
- B. Consider the entry of default against Defendant as a sanction due to Defendant's steadfast refusal to stop practicing law on behalf of third-parties and for using virulently offensive language in Defendant's pleading;
- C. Consider requiring Defendant to post a contempt bond for security against his being in contempt of future court orders;
- D. Award Plaintiff any and all further relief which is warranted by law or equity.

All relief Defendant seeks in his latest filing should be denied in toto (if said filing is reviewed on the merits), or the filing should simply be stricken entirely.

Respectfully submitted,

**REO LAW, LLC**

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Dated: June 1, 2023

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
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**BRYAN ANTHONY REO,**

Plaintiff

v.

**MARTIN LINDSTEDT,**

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

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Fed. R. Civ. P. 12(f)  
[ALL CASES]

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*Pro se Defendant*

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**CERTIFICATE OF SERVICE**

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I, Bryan Anthony Reo, affirm that I am a party to the above-captioned civil action, and on June 1, 2023, I served a true and accurate copy the foregoing document 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  
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Dated: June 1, 2023