

Defendant's Response to Order Dec 91 of  
Requests for Admissions Using Bryan Reo paper  
sent to him.

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-02589-CAB

Hon. Christopher A. Boyko

Mag. Thomas M. Parker

Request for Admissions  
Order Dec 91 using Bryan  
Reo paper

PLAINTIFF'S NOTICE OF WITHDRAWAL  
OF MOTION TO CONTINUE

NOW COMES Bryan Anthony Reo ("Plaintiff"), *pro se*, and hereby propounds upon Martin Lindstedt ("Defendant") Plaintiff Bryan Anthony Reo's First Set of Requests for Admissions, Interrogatories, and Requests for Production of Documents to Defendant Martin Lindstedt pursuant to Fed. R. Civ. P. 26, 33, 34, and 36, to be answered by Defendant within thirty (30) days of service thereof.

DEFINITIONS AND INSTRUCTIONS

- A. These discovery requests are governed by the Federal Rules of Civil Procedure and the United States Code.
- B. The answers you provide to these discovery requests are to be typed or printed legibly in the English language.
- C. For each discovery request to which you object to answering it either partially or fully, explain in detail your objection, and if you are making an objection on the basis that said discovery request is burdensome, state: (1) the number of documents needed to be searched; (2) the location of the documents; (3) the estimated number of hours required to conduct a search and review of the documents; and (4) the estimated cost of searching for and reviewing the records in United States dollars.
- D. Other than the specific definitions set forth in the Federal Rules of Civil Procedure or *infra*, the words contained herein are to be understood by their plain meaning, as defined by the



*Merriam-Webster Online Dictionary*, which is available at <<http://www.merriam-webster.com>>.

- E. "Plaintiff" refers to the Bryan Anthony Reo and his agents and employees.
- F. "Defendant" refers to Martin Lindstedt and his agents and employees.
- G. "Parties" means Plaintiff and Defendant collectively.
- H. "Document" or "documents" means the original or a true and accurate copy of any tangible or electronically stored item in any medium now known or to be invented to which you have actual or constructive knowledge of its current or former existence. Document and documents includes but is not limited to any designated tangible or electronically stored information—including writings, letters, memorandums, electronic mail, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations—stored in any medium from which information can be obtained. See Fed. R. Civ. P. 34(a)(1).
- I. These Discovery Requests shall be construed to be continuing in nature so as to require prompt further and supplemental amendments if you acquire actual or constructive knowledge that its answers are not fully accurate. See Fed. R. Civ. P. 26(e).

**INTERROGATORIES**

*Doc 91 Dulew 5/24/15  
"Admissions"*

**INTERROGATORY NO. 1:** State and any all facts known to you which evince that Defendant was not directing Defendant's tortious conduct—as described within Plaintiff's Complaint—to the State of Ohio so as to cause injury to Plaintiff in said state.

**ANSWER:**

**INTERROGATORY NO. 2:** State and any all facts known to you which evince that Plaintiff has engaged in homosexual oral sex with any Missouri state trial court judges in exchange for favorable rulings on legal matters.

**ANSWER:**

**INTERROGATORY NO. 3:** State and any all facts known to you which evince that Plaintiff has ever bribed or improperly influenced a judge, whether in Ohio, Missouri, or anywhere, to obtain anything of value, including but not limited to advantage in a legal matter.

**ANSWER:**

**INTERROGATORY NO. 4:** State and any all facts known to you which evince that Plaintiff has engaged in homosexual incest with Plaintiff's own father.



ANSWER:

*Order says "Admissions"  
NOT Take Interrogatories*

**INTERROGATORY NO. 5:** State and any all facts known to you which evince that Plaintiff has committed marital infidelity against Stefani Rossi Reo at any time since marrying her in December 2016.

ANSWER:

**INTERROGATORY NO. 6:** State and any all facts known to you which evince that Plaintiff had a petition for dissolution of marriage pending in February 2019 and that the reason for the petition involved homosexual incest, homosexual infidelity, or any sort of infidelity.

ANSWER:

**INTERROGATORY NO. 7:** State and any all facts known to you which evince that Plaintiff has engaged in the crime of extortion.

ANSWER:

**INTERROGATORY NO. 8:** State and any all facts known to you which evince that Plaintiff has attempted to engage in extortion or has engaged in extortion against Defendant by attempting to enforce and execute a judgment that was duly rendered and entered in favor of Plaintiff against Defendant by the Court of Common Pleas of Lake County Ohio.

ANSWER:

**INTERROGATORY NO. 9:** State and any all facts known to you which evince that Plaintiff is not a non-public figure for purposes of First Amendment jurisprudence.

ANSWER:

**INTERROGATORY NO. 10:** State the names and addresses of any and all people who have personal knowledge of the facts as detailed within Defendant's answers to Interrogatories Nos. 1 through 9.

ANSWER:

**INTERROGATORY NO. 11:** State the facts—if any—which support Defendant's contention—if Defendant has one—that Defendant enjoys one or more affirmative defenses so as to justify or mitigate Defendant's liability to Plaintiff.

ANSWER:



REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1: Please admit that at all times relevant to the controversy as described within Plaintiff's Complaint, Defendant knew that Plaintiff is a resident of the State of Ohio.

ANSWER: Admitted. Defendant figured Bryan Reed lived some where in Ohio after field work

REQUEST FOR ADMISSION NO. 2: Please admit that at all times relevant to the controversy as described within Plaintiff's Complaint, Defendant knew that Defendant's acts of commission as described within Plaintiff's Complaint would cause Plaintiff to suffer damages in the State of Ohio.

ANSWER: Denied. Unearthing a public-figure agent prosecution such as Bryan Reed is a public service.

REQUEST FOR ADMISSION NO. 3: Please admit that at all times relevant to the controversy as described within Plaintiff's Complaint, Defendant purposefully acted in a tortious manner so as to cause Plaintiff to suffer damages in the State of Ohio.

ANSWER: Denied to "tortious manner" and no Bryan Reed damages

REQUEST FOR ADMISSION NO. 4: Please admit that on August 9, 2019, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had engaged in homosexual oral sex with Missouri state trial court Judge Gregory Stremel for the purpose of obtaining a favorable ruling in a litigation matter against Defendant.

ANSWER: Denied.

REQUEST FOR ADMISSION NO. 5: Please admit that the conduct alleged in Admission No. 4 would constitute the crime of bribery, in addition to constituting unprofessional conduct, and that it would additionally be immoral conduct.

ANSWER: Denied

REQUEST FOR ADMISSION NO. 6: Please admit that bribery and improper influence of a judge constitutes unprofessional conduct pursuant to the Ohio Rules of Professional Conduct.

ANSWER: Objection. Bryan Reed existence is an affront to such Ohio Lawyer Rules

REQUEST FOR ADMISSION NO. 7: Please admit that having sex with a judge to obtain a favorable ruling is a crime in Ohio and Missouri.

ANSWER: Denied as to Reed allegations as such was NOT said.

REQUEST FOR ADMISSION NO. 8: Please admit Plaintiff has never engaged in homosexual oral sex, or any sexual conduct or contact, with Missouri state trial court Judge Gregory Stremel.



ANSWER: Denied. Pastor Lindstedt made no such claim.

REQUEST FOR ADMISSION NO. 9: Please admit Plaintiff has never bribed any judge anywhere.

ANSWER: Denied. Defendant published no such specific claim.

REQUEST FOR ADMISSION NO. 10: Please admit on September 6, 2019, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had a homosexual incestuous affair with Plaintiff's own father.

ANSWER: Denied. Bryan Reed lies as Reed admitted before other courts.

REQUEST FOR ADMISSION NO. 11: Please admit that incest is a criminal offense in Missouri.

ANSWER: Objection as to Bryan Reed foundation to propagate lies.

REQUEST FOR ADMISSION NO. 12: Please admit that homosexual incest is immoral and offensive by reasonable community standards in Ohio and Missouri.

ANSWER: Denied. Until Bryan Reed lied the matter never came up.

REQUEST FOR ADMISSION NO. 13: Please admit that adultery is immoral and offensive by reasonable community standards in Ohio and Missouri.

ANSWER: Objection. Bryan Reed is immoral & offensive.

REQUEST FOR ADMISSION NO. 14: Please admit Plaintiff never engaged in homosexual incestuous sex with Plaintiff's own father.

ANSWER: ~~Objection.~~ Denied. Pastor Lindstedt never said that this happened. Only

REQUEST FOR ADMISSION NO. 15: Please admit that on September 10, 2019, Defendant published on the worldwide web a false and defamatory statement alleging that Plaintiff had extorted Defendant in connection with a valid duly issued judgment Plaintiff obtained against Defendant from Lake County Court of Common Pleas.

ANSWER: Admitting part. Bryan Reed has been extorting Defendant since July 1, 2019.

REQUEST FOR ADMISSION NO. 16: Please admit that it would constitute unprofessional conduct pursuant to the Ohio Rules of Professional Conduct for Plaintiff to engage in extortion.

ANSWER: Denied. That certainly has not stopped Bryan Reed.



**REQUEST FOR ADMISSION NO. 17:** Please admit that extortion constitutes a criminal offense pursuant to Ohio Revised Code Section 2905.11.

ANSWER: Admitted. Bryan Reed ought to stop  
— and a long time ago.

**REQUEST FOR ADMISSION NO. 18:** Please admit that extortion is a crime in Missouri.

ANSWER: Admitted. When is Bryan Reed going to  
CONFESS?

**REQUEST FOR ADMISSION NO. 19:** Please admit that Plaintiff never committed extortion.

ANSWER: Denied. Bryan Reed's entire modus  
operandi is extortion.

**REQUEST FOR ADMISSION NO. 20:** Please admit that all of Defendant's publications about Plaintiff—as described within Plaintiff's Complaint—were published by Defendant to third-parties.

ANSWER: Denied. All of Bryan Reed's Complaint  
is lies.

**REQUEST FOR ADMISSION NO. 21:** Please admit that Defendant is liable to Plaintiff for defamation for the reasons articulated in Paragraphs 37 through 44 of Plaintiff's Complaint.

ANSWER: Denied. All of Bryan Reed's Complaint  
is lies.

**REQUEST FOR ADMISSION NO. 22:** Please admit that Defendant is liable to Plaintiff for invasion of privacy—false light—for the reasons articulated in Paragraphs 45 through 51 of Plaintiff's Complaint.

ANSWER: Denied. Bryan Reed is not only a  
public figure but an agent provocateur.

**REQUEST FOR ADMISSION NO. 23:** Please admit that Defendant is liable to Plaintiff for intentional infliction of emotional distress for the reasons articulated in Paragraphs 52 through 56 of Plaintiff's Complaint.

ANSWER: Denied. Bryan Reed is evil & crazy.

**REQUEST FOR ADMISSION NO. 24:** Please admit Plaintiff is entitled to an award against Defendant in the form of punitive damages for the reasons articulated in Paragraphs 7 through 63 of Plaintiff's Complaint.

ANSWER: Denied. Ever since April 2014 and  
the 30+ cases by Bryan Reed to render  
Pastor Loubert & his Aryan Nations Church  
punishment means Bryan Reed should be  
punished.



**REQUEST FOR ADMISSION NO. 25:** Please admit Plaintiff is entitled to permanent injunctive relief against Defendant for the reasons articulated in Paragraphs 57 through 63 of Plaintiff's Complaint.

ANSWER: Denied. Bryan Neo should set no "ages or law"

**REQUEST FOR ADMISSION NO. 26:** Please admit that Defendant caused willful and malicious injury—as these terms are defined by 11 U.S.C. § 523(a)(6)—to Plaintiff for the reasons alleged in Plaintiff's Complaint.

ANSWER: Denied. Bryan Neo has caused the injuries to Pastor Lundstedt & his Church.

**REQUEST FOR ADMISSION NO. 27:** Please admit that Defendant does not have a meritorious affirmative defense in relation to any and all causes of action Plaintiff pled against Defendant in Plaintiff's Complaint.

ANSWER: Denied. Bryan Neo has no case.

**REQUEST FOR ADMISSION NO. 28:** Please admit that Plaintiff never committed an act of commission or omission against Defendant for which Plaintiff is liable to Defendant for money damages.

ANSWER: Denied. Bryan Neo & Friends have taken Pastor Lundstedt's inheritance & cost Pastor Lundstedt's sister damages

**REQUEST FOR ADMISSION NO. 29:** Please admit that for purposes of First Amendment jurisprudence, Plaintiff is a non-public figure.

ANSWER: Denied. Bryan Neo is a public figure & known & admitted agent provocateur.

**REQUEST FOR ADMISSION NO. 30:** Please admit that for the reasons set forth within Plaintiff's Complaint, Plaintiff suffered \$250,000.00 in general damages due to Defendant's tortious conduct.

ANSWER: Denied. Bryan Neo refuses to compute damages.

**REQUEST FOR ADMISSION NO. 31:** Please admit that for the reasons set forth within Plaintiff's Complaint, Plaintiff it would be just and proper for Plaintiff to be awarded \$500,000.00 in punitive damages against Defendant due to Defendant's willful and malicious misconduct.

ANSWER: Denied. The 6th Circuit told these judges in fact that they broke Ohio law

**REQUEST FOR ADMISSION NO. 32:** Please admit to the truth of all allegations, factual and legal, contained within Plaintiff's Complaint.

ANSWER: Denied. Bryan Neo allegations, factual & "legal" are all lies.



**REQUEST FOR ADMISSION NO. 33:** Please admit that your counterclaim or claims pending against Plaintiff Bryan Anthony Reo, if any, are wholly lacking in merit.

ANSWER:

*Denied. All and every counterclaims against long-term enemy Bryan Reo are warranted.*

**REQUEST FOR ADMISSION NO. 34:** Please admit that your counterclaim or claims pending against Plaintiff Bryan Anthony Reo, if any, are without any evidentiary or factual basis.

ANSWER:

*Denied. These claims + counter-claims are provable.*

**REQUEST FOR ADMISSION NO. 35:** Please admit that judgment should be entered against you, in favor of Plaintiff Bryan Anthony Reo, in the amount of \$750,000.00 dollars.

ANSWER:

*Denied. Bryan Reo isn't due 75 cents  
End of Requests for Admissions*

**REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION OF DOCUMENTS #1:** Produce true and accurate copies of any and all documents which you believe evince that Defendant was not directing Defendant's tortious conduct—as described within Plaintiff's Complaint—to the State of Ohio so as to cause injury to Plaintiff in said state.

ANSWER:

**REQUEST FOR PRODUCTION OF DOCUMENTS #2:** Produce true and accurate copies of any and all documents which you believe evince that Plaintiff has engaged in sexual conduct with any judge, anywhere, at any time.

ANSWER:

**REQUEST FOR PRODUCTION OF DOCUMENTS #3:** Produce true and accurate copies of any and all documents which you believe evince that Plaintiff has specifically engaged in homosexual oral sex with Missouri trial court Judge Gregory Stremel for the purpose of obtaining advantage in litigation.

ANSWER:

**REQUEST FOR PRODUCTION OF DOCUMENTS #4:** Produce true and accurate copies of any and all documents which you believe evince that Plaintiff has engaged in homosexual incestuous sex with Plaintiff's own father.

ANSWER: