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

BRYAN ANTHONY REO, STEFFANI
ROSSI REO, ANTHONY DOMENIC REO,
ATTORNEY KYLE BRISTOW,
BRETT KLIMKOWSKY, JUDGE
PATRICK CONDON, LAKE COUNTY
OHIO COURT OF COMMON PLEAS,
STATE OF OHIO, U.S. FEDERAL
GOVERNMENT,

Plaintiff(s) / Counter-Defendants,

v.

MARTIN LINDSTEDT, PASTOR, THE CHURCH OF JESUS CHRIST CHRISTIAN / ARYAN NATIONS OF MISSOURI,

Defendant(s) / Counter-Claimants.

Case No. 1:19-CV-02589-CAB

Hon. Christopher A. Boyko

Mag. Thomas A. Parker

FILED

FEB 0 3 2020

CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF OHIO CLEVELAND

DEFENDANTS AMENDED ANSWER AS ORDERED TO BRYAN REO WITH COUNTER-CLAIMS AGAINST PLAINTIFF REO AND ADDITIONAL REO PLAINTIFFS AND REO COUNTER-DEFENDANTS,

ALSO THE LAKE COUNTY COURT OF COMMON PLEAS & JUDGE PATRICK CONDON FOR EXCEEDING THEIR JURISDICTION (IF ANY),

AND THE STATE OF OHIO AND FEDERAL GOVERNMENT FOR ALLOWING REO
PLAINTIFFS TO VIOLATE FIRST AMENDMENT RIGHTS OF PASTOR LINDSTEDT
& LINDSTEDT'S CHURCH UNDER COLOR OF LAW AS POLICY

I. OVERVIEW OF THE AMENDED ANSWER AND COUNTER-CLAIMS

COMES NOW the current Defendant Pastor Martin Lindstedt (hereafter in person described as "Pastor Lindstedt) OF THE Church of Jesus Christ Christian / Aryan Nations of Missouri (hereafter described as Pastor Lindstedt's Church) to make a this Amended Answer as ORDERED by this Court on Jan 17th 2020 and received on Jan. 21st to plaintiff Attorney Bryan

and to make a Counter-Claim against Bryan Reo and Bryan Reo friends and family as ORDERED by this Court. Bryan Reo has filed two lawsuits, along with Bryan Reo's father Anthony Domenic Reo and Stefani Rossi Reo for a total of four of these frivolous lawsuits for "defamation" against Pastor Lindstedt for \$500,000 each trying to steal Pastor Lindstedt's South Dakota inheritance. These four lawsuits are as follows:

Bryan Anthony Reo v. Martin Lindstedt 1:19-cv-02103-SO

Bryan Anthony Reo v. Martin Lindstedt 1:19-cv-02589-CAB ← This one

Anthony Domenic Reo v. Martin Lindstedt 1:19-cv-02615-JRA

Stefani Rossi Reo v. Martin Lindstedt 1:19-cv-02786-CAB

In all of these cases, as in the previous federal and Lake County cases Bryan Reo has instigated against Pastor Lindstedt and Lindstedt's Church and Lindstedt's woman Bryan Reo compiles a claim of defamation over the Internet wherein Pastor Lindstedt documents Bryan Reo's "progress" as a homosexual non-white agent provocateur to infiltrate the White Supremacy and Christian Identity Resistance Movements over the Internet (as being an obvious effeminate non-white mongrel acting in real life could prove dangerous) for the past 20 years. As both the federal and Ohio courts are acting against the founding stock of whites, and are scared to death of revolt and Civil War these cases always go against an overt White Supremacist Christian Identity pastor like Pastor Lindstedt, it is to be expected that this "lawfare" or "legal warfare" is going to go against Pastor Lindstedt and Lindstedt's Church. This Court has taken the "politically correct" ruling that "Pastor Lindstedt filed an ["improper"] Answer and Counterclaim, containing many derogatory terms and insults directed at Plaintiff, his family members and others." As President Harry Truman supposedly wrote to General McArthur and Admiral Nimitz upon the Japanese surrender in Aug. 1945, "political correctness" is the delusion

that there is a way to pick up a piece of shit by its clean end." There is no "clean end" to the delusional homosexual mongrel agent provocateur Bryan Reo, or Bryan Reo's father or wife or fellow lawyers Kyle Bristow and Brett Klimkowsky of the Foundation for the MarketPlace of Ideas (FMI) or ZOGbot Poverty [F]Law Center (ZPLC). Bryan Reo is a limited-purpose public figure with the Resistance Movement that it tries to infiltrate and what Pastor Lindstedt inelegantly posts on his Church web pages is substantially true and correct. Bryan Reo also claims that it cannot understand Pastor Lindstedt's answer and counterclaims like from 2014 to 2019 to 2020. Pastor Lindstedt merely republishes as a warning to the racial dissident community what Pastor Lindstedt has found out about Bryan Reo since 2010 – all of it bad. Both the state and federal courts want Pastor Lindstedt to regurgitate legalistic monkey-talk as a supplicant rather than a Revolutionary player so that they can pretend that they are acting under "due process" and "rule of law". Bryan Reo also claims that Pastor Lindstedt's first Answer on Nov. 14, 2019 was "scandalous, impertinent and immaterial matters which should be stricken pursuant to Fed.R.Civ.P 12 (f)." Pastor Lindstedt agrees that having a crazed delusional homosexual mongrel as an agent provocateur impersonating a White Supremacist and Christian Identity leader can be scandalous and impertinent to somebody or something (like the federal and state governments which foist Bryan Reo off as one of us actual White Supremacists) but fail to see why Pastor Lindstedt chronicling this Bryan Reo criminal history on Lindstedt's Church's web pages is "immaterial" – especially when it is Bryan Reo who makes this repetition necessary due to Bryan Reo never-ending frivolous litigation against Lindstedt in state and federal courts.

However, Pastor Lindstedt has admitted that while Pastor Lindstedt is an excellent Dual-Seedline Christian Identity pastor tasked with removing such as Bryan Reo, family and friends from pretending to be one of us, Pastor Lindstedt's previous Answer & Counter-claim was less

than excellent and Pastor Lindstedt asked this Court for leave to alter or amend his "admittedly flawed Answer & Counter-Claim." Whereupon this Court has made such an ORDER which Pastor Lindstedt will attempt to obey using more recent knowledge which will pass muster.

This Court would be better served by dismissing all of Bryan Reo's lawsuits against Pastor Lindstedt and disbarring Bryan Reo, Kyle Bristow, and Brett Klimkowsky as officers of this court. Pastor Lindstedt no longer owns property in South Dakota and what modest property is owned in Missouri is owned in common with Pastor Lindstedt's woman Roxie Fausnaught, who is ailing. The Lake County Court admitted to not having jurisdiction to enforce its judgments outside Ohio when pressed by Bryan Reo to jail Pastor Lindstedt for contempt for not obeying Ohio Civil Rule 69 and forcing Pastor Lindstedt to reveal his bank accounts (since closed) and business associates. Both Ohio and Missouri forbid execution while a case is on appeal. Bryan Reo will get nothing in Missouri and South Dakota. Thus Pastor Lindstedt won't be jailed for civil contempt in Lake County. This federal court has no authority to issue a "gag order" like Bryan Reo keeps on whining to be granted. Thus there is no point to this further Bryan Reo vexatious and frivolous litigation which brings only contempt and ridicule to the federal courts and creates precedent for destroying today's current regimeists upon revolution.

Wherefore Pastor Lindstedt presents this Amended Answer & Counter-Claim against Bryan Reo, Bryan Reo's father and wife, Bryan Reo fellow lawyers Kyle Bristow and Brett Klimkowsky from the not-quite defunct Foundation for the MarketPlace of Ideas (FMI), Lake County Court of Common Pleas and Judge Patrick Condon for exceeding any jurisdiction, if they had any in the first place, in bringing to trial Pastor Lindstedt and Lindstedt's Church for the exercise of their supposed First Amendment "rights" of Free Speech and Religion. The State of Ohio is being sued for granting lawyers a "patent of nobility" above the law to where they insist

that non-commercial religious organizations incorporated only to accomplish their religious beliefs must hire these private officers of the Ohio Courts and cannot defend themselves otherwise other through by religious civil and racial warfare. Lastly sued is the U.S. Federal Government for imposing all these agents provocateurs like Bryan Reo, Brett Klimkowsky, Kyle Bristow, and William Finck to spy / co-opt the White Supremacist & Christian Identity Movements and Pastor Lindstedt & Lindstedt's Church in particular to harass with frivolous and malicious quasi-legal persecution under color of law to violate the First Amendment paper "guarantees" of Freedom of Religion, Speech, and of the Press.

Pastor Lindstedt needs access to Electronic Case Filing to counter Bryan Reo crookedness in refusing to mail off its numerous Motions so that Pastor Lindstedt's replies and motions can be timely and cheaply filed in both defense and offense.

II. PARTIES

Plaintiff / Counter-Defendant Suing Defendant (and Reo co-conspirators)

1. Bryan Reo is the main Plaintiff acting against Defendant Pastor Lindstedt and if it wasn't for Bryan Reo none of these unnecessary cases would exist. Bryan Reo is a public or limited-purpose public figure within the White Supremacist / Christian Identity community from 2003 to now. In fact, Reo is actually a non-white Anti-racist activist and agent provocateur who founded the Foundation for the MarketPlace of Ideas as a supposed White Supremacist "lawfare" public corporation. While Bryan Reo claims to have "never" been a wannabe "White Supremacist" this 2017 501(c)(3) IRS tax return says otherwise as along with Bryan Reo is Attorney Kyle Bristow and Brett Klimkowsky and other Board of Directors Richard Spencer and Mike Enoch who carried out Charlottesville. See: http://zogbots.xyz/WN/FMI-ZPLC/FMI-ZPLC_501c3.pdf

Thus while Reo implausibly claims to be a private figure, Reo's conduct against Pastor Lindstedt and Lindstedt's Church is that of a public figure with no cause for action under *New York Times v. Sullivan*, 376 US 254. Reo has been abusing legal process against Pastor Lindstedt since April 2014 when Reo filed a federal lawsuit against Pastor Lindstedt, lost, then refiled in Lake County, and after four years has won, whereupon Reo has filed four new lawsuits against Lindstedt, two for itself and one each for its wife and father. Bryan Reo lives in the same house as its wife and father at 7143 Rippling Brook Lane, Mentor Ohio 44060. Pastor Lindstedt is counter-suing Bryan Reo for all of this past Bryan Reo litigation in Lake County and all four of the federal litigation cases removed by Defendant from Lake County to this federal district court, including this particular case along with Reo family and friends.

- 2. Stefani Rossi Reo (hereafter Mrs. Reo) is Bryan Reo's wife. Pastor Lindstedt saw her jumping up and down in the hallway of the Lake County Courthouse at trial on 25 June 2019 trying to get Bryan Reo's and another person's attention (who Pastor Lindstedt later found out was Bryan Reo's father.) Pastor Lindstedt republished a Bryan Reo "Quora" article about her deceiving Reo with talk of wanting children, avoiding a divorce, then deceiving Reo again which Reo since deleted in order to cover its tracks. She is also now suing Pastor Lindstedt for \$500,000 for Lindstedt publishing these observations, even though she was not mentioned by name but rather by nickname. Pastor Lindstedt is counter-suing Mrs. Reo for participating in this Bryan Reo litigation for being a willing tool of her husband. Mrs. Reo lives with Bryan Reo at 7143 Rippling Brook Lane, Mentor Ohio.
- **3. Anthony Domenic Reo** is Bryan Reo's father (hereafter Bryan Reo's father). Pastor Lindstedt had counter-sued Bryan Reo's father in the 2014 federal and 2015 Lake County cases but Bryan Reo evaded service on behalf of its father. The first day of the Lake County trial on 24

June 2019 Bryan Reo told its father to not show up "because Pastor Lindstedt was so vile." So the next day when Pastor Lindstedt seen Mrs. Reo jumping around in the hall and neither Reo nor Reo's father paying any attention to her, Pastor Lindstedt assumed that it was because they were homosexual mongrels. Later when Bryan Reo sent its 9 Sept 2019 filing for Stefani Rossi Reo v Martin Lindstedt 19VC001466 Pastor Lindstedt figured out that what he had mistook for a homosexual mongrel was Bryan Reo's father – a mongrel yes, but probably not a homosexual mongrel. Bryan Reo's father was suing Pastor Lindstedt under the supervision of Bryan Reo for \$500,000 in Anthony Domenic Reo v. Martin Lindstedt 19CV001531 in Lake County Ohio. Now this case has been federalized. All four of these bogus Bryan Reo cases were removed to federal court. Anthony Domenic Reo v. Martin Lindstedt 19-CV-2615 is the federal case removed from Lake County. Bryan Reo is having his father and wife help file these cases in order to overwhelm Pastor Lindstedt in legal foolishness trying to gain through abuse of legal process Pastor Lindstedt's inheritance one \$500,000 chunk at a time. Bryan Reo's father is being counter-sued by Pastor Lindstedt for participation in this frivolous and malicious litigation against Pastor Lindstedt. Bryan Reo's father lives with Bryan Reo's wife & Bryan Reo at 7143 Rippling Brook Lane, Mentor Ohio.

4. Attorney Kyle Bristow, Esq. 42383 Garfield Rd, Mt. Clemens MI(?), PO Box 381164 Clinton Twp 48038. Law Office (248) 838-9934 <u>BristowLaw@gmail.com</u> is Chairman of the Foundation for the MarketPlace of Ideas (FMI) and Bryan Reo was Bristow's "law clerk" and on the Board of Directors. See: http://zogbots.xyz/WN/FMI-ZPLC/FMI-ZPLC_501c3.pdf FMI was a "White Supremacist" 501(c)(3) corporation which practiced "lawfare" for what turned out to be federal agents provocateur "leading" the "Alt-Right" in forcing state university systems to host Richard Spencer – also on the Board of FMI like Bryan Reo and Brett Klimkowsky. FMI

supposedly dissolved itself in early March 2018 with the resignation of Kyle Bristow. However, Kyle Bristow drafted and wrote a motion for attorney's fees for Brett Klimkowsky and submitted by Bryan Reo on July 24, 2019. Recently Attorney Bristow showed up again as an attorney for David Duke regarding the Charlottesville civil cases which both Duke and Bristow and Richard Spencer as Board members of FMI/ZPLC instigated. Thus Kyle Bristow and Brett Klimkowsky are still actively conspiring with Bryan Reo to steal Pastor Lindstedt's inheritance and violate Pastor Lindstedt's and Lindstedt's Church's First Amendment and other civil rights.

- 5. Attorney Brett Allan Klimkowsky, Esq. P.O Box 114, Martin Ohio 43445 (419-360-1738) brett1066@gmail.com was Bryan Reo's lawyer and around July 23 2019 re-appeared under Bryan Reo's Motion for Attorney's Fees which Attorney Kyle Bristow wrote and to make an affidavit for \$4200. Brett Klimkowsky, like Bryan Reo were members of the Board of FMI. See: http://zogbots.xyz/WN/FMI-ZPLC/FMI-ZPLC_501c3.pdf However, like Bryan Reo they are actually liberals pretending to be White Supremacists until they decided that they didn't want to play White Supremacist any more in March 2018 after getting public criticism for racism. Yet both Kyle Bristow and Brett Klimkowsky show back up in July 2019 to assist Bryan Reo in trying to extort more money from Pastor Lindstedt and Lindstedt's Church under color of law. All three of FMI Attorneys Reo, Bristow and Klimkowsky are actively working as of July 24, 2019 against Pastor Lindstedt and Lindstedt's Church and so they are hereby added to this suit through counter-claim as Bryan Reo Plaintiffs/Co-Conspirators.
- **6. Lake County Ohio Court of Common Pleas / Judge Patrick Condon**. Bryan Reo used the Lake County Court of Common Pleas to enrich itself through abuse of legal process both before and now that it is an officer of that Court. Bryan Reo has "won" a judgment for \$40,000 in unnamed compensatory damages, \$50,000 in punitive damages in Reo. v. Lindstedt

15CV001590, and \$15,000 for "false light" against Lindstedt and \$200 in compensatory and \$200 in punitive damages against Pastor Lindstedt's Church in Reo v. The Church of Jesus Christ Christian / Aryan Nations of Missouri in Reo v. The Church of Jesus Christ Christian / Aryan Nations of Missouri 16CV000825 (which claimed jurisdiction when the Mentor Municipal Court declined to exercise becoming a Bryan Reo litigation mill and kicked it up to Lake County). There should be no real jurisdiction regarding what is said over the Internet eight or nine years ago between warring public figures 900 miles apart, several states away and violative of the First Amendment, otherwise there can be no Internet. Yet the Lake County Court and Judge Patrick Condon has held a trial on claims barred by the Ohio Statutes of Limitation, refused to allow Pastor Lindstedt to present evidence in his own favor, issued improper jury instructions, empanelled a biased jury, and conducted farcical proceedings. Indeed it is impossible to sue a Church for mere "words" as in Reo v. Aryan Nations of Missouri except by violating the First Amendment paper guarantees of Freedom of Speech and Religion and the Press. In this Answer and Counter-Claim Pastor Lindstedt is hereby adding the Lake County Courts or Judge Patrick Condon at this time for conspiracy and collusion to violate the civil rights of Pastor Lindstedt and Lindstedt's Church without jurisdiction over Pastor Lindstedt.

7. The State of Ohio. The State of Ohio presumes to "license" attorneys who are otherwise self-regulated by their bar associations and Ohio Supreme Court. Thus Bryan Reo has been allowed to run wild filing frivolous and malicious litigation against Pastor Lindstedt and Lindstedt's Church. Furthermore, the Ohio Supreme Court has given attorneys a false patent of nobility to where Pastor Lindstedt couldn't defend in their court his Church. Therefore a federal question is why cannot a Church be represented by its clergy as part of its exercise of religion and free speech? Contrary to Bryan Reo's lies, the Church of Jesus Christ Christian / Aryan

Nations of Missouri is NOT a 501 (c)(3) organization or anything else other than a non-profit religious organization for the benefit of Aryan Christian Israelites to advance Dual-Seedline Christian Identity beliefs. Bryan Reo used the mere name "Aryan Nations" to inflame a hostile jury and to get at Pastor Lindstedt under color of trial. Therefore the State of Ohio, its bar associations and legal associations, and its courts absent any jurisdiction over the Church are violating the First Amendment and are joindered for civil rights violations under 42 U.S.C. 1983 & 1985 and must defend their abuse of the civil rights of Pastor Lindstedt & Lindstedt's Church.

8. The US Government. The Federal Government operates agents provocateur and informants designed to go within White Supremacy and Christian Identity groups, especially those calling themselves Aryan Nations. It is suspected that Bryan Reo (along with the entire Board of Directors of FMI/ZPLC See: http://zogbots.xyz/WN/FMI-ZPLC/FMI-ZPLC_501c3.pdf) is one of these agents provocateur and informants placed to disrupt through bogus legal process Pastor Lindstedt and Lindstedt's Aryan Nations Church. Indeed Bryan Reo has admitted to being a federal informant with others. Therefore, Pastor Lindstedt intends to joinder the Federal Government for letting Bryan Reo and Bristow and Klimkowsky serve as informants and .agent provocateur and as a means of destroying Pastor Lindstedt and Lindstedt's Church through this fraudulent and vexatious litigation in the Lake County Ohio courts and this federal court.

The Defendant(s) / Counter-Claimants Parties.

9. Pastor Martin Lindstedt. Pastor Lindstedt is a limited-purpose public figure within Dual-Seedline Christian Identity the White Supremacy Movement through operating two local militias post-Waco to 1997. Pastor Lindstedt has operated a web page since Feb 1996, publishing mostly racist political & Dual-Seedline Christian-Identity religious material supposedly "protected" by

the First Amendment. Since 2009 Pastor Lindstedt has operated a Christian Nationalist forum at http://whitenationalist.org/forum and http://christian-identity.net/forum and many other blogs and forums. Pastor Lindstedt has had a podcast and used other Internet media to express his White Supremacist politics and Christian Identity religious views. Bryan Reo has taken it upon itself to take down Pastor Lindstedt's forums, web pages and blogs since March 2010 before Pastor Lindstedt found out Bryan Reo's real name and where it lived on Oct. 29, 2010. Since then Bryan Reo intensified its oppression and suppression of the fact that Bryan Reo isn't white or heterosexual, but until 2013 or 2014 Bryan Reo thought Pastor Lindstedt was poor. Then Bryan Reo found out about Pastor Lindstedt's inheritance of 1800 acres in South Dakota and decided to file a federal lawsuit DMCA lawsuit, then when that was dismissed to immediately file before Lake County Ohio a new lawsuit even though the Ohio Statute of Limitations had passed. Reo played games with discovery and Lindstedt didn't play so Reo got onto a NIM-Busters forum, impersonated Pastor Lindstedt making death threats against Reo, then sought and gained a fraudulent stalking protection order that Pastor Lindstedt did not contest because Lindstedt didn't want to drive 900 miles to Lake County. As recently finally admitted on Jan 14, 2020 the Lake County Courts have no jurisdiction to enforce their judgments outside boundaries of the State of Ohio. After nearly four years of filing Motions to Strike and Continuances two lawsuits, Reo v. Lindstedt 15CV001590 and Reo v. Lindstedt 16CV000825 went to trial in Lake County and a biased judge (Patrick Condon) refused to allow Pastor Lindstedt to present any evidence in his own favor, refused to acknowledge the Ohio Statutes of Limitations barred prosecution of Reo's litigation, empanelled a biased jury slavering to convict the Aryan Nations pastor and an Aryan Nations Church, refused to sanction Bryan Reo for perjury and abuse of legal process, refused to allow any jury instructions on behalf of Lindstedt, and ruled against

Lindstedt so far for a directed verdict of overturning the jury verdict of \$105,000 against Pastor Lindstedt and \$400 against Pastor Lindstedt's Church. Since then Bryan Reo has gotten a lien placed against Lindstedt's South Dakota inheritance and has unlawfully extorted threats to sell at Sheriff's sale Pastor Lindstedt's and Roxie Fausnaught's modest primary residence in Missouri while the case is on appeal. Bryan Reo has filed four more bogus and fraudulent lawsuits in Lake County Ohio, including this one. Pastor Lindstedt has had all of these frivolous Lake County Reo family cases removed to this federal court for trial. Pastor Lindstedt is merely reporting factually on the antics and doings of a federal agent provocateur / ZOGbot limited-purpose public figure named Bryan Reo / SwordBrethren / and other aliases and should have the full protection of the First Amendment. Bryan Reo and Reo conspirators are counter-sued in order to end and deter this Bryan Reo assault upon the First Amendment and Pastor Lindstedt, Lindstedt's Church, and Lindstedt's property. The federal government is hereby counter-sued for letting its agents provocateurs like Bryan Reo, the Reo family and Attorneys Kyle Bristow and Brett Klimkowsky run wild in filing this "lawfare" against Pastor Lindstedt and Lindstedt's Church.

10. The Church of Jesus Christ Christian / Aryan Nations of Missouri Is a Church

Corporation in good standing within the State of Missouri since Oct. 2006 when Pastor Lindstedt had Roxie Fausnaught, his woman, file the paperwork before the Missouri Secretary of State for \$25. The purpose of incorporation was to allow Pastor Lindstedt to call himself a "Pastor" and even an ArchBishop without having to buy an expensive and largely worthless credential from some seminary which in any case doesn't know a tenth as much Dual-Seedline Christian Identity doxology as Pastor Lindstedt. This federal Court has ruled continually that Pastor Lindstedt's Church cannot be represented by Pastor Lindstedt, its non-lawyer head. However, Bryan Reo has abused his position as an attorney to sue Pastor Lindstedt's Church and Lindstedt's elderly

illiterate bed-bound illiterate bed-bound 63-year-old domestic partner Roxie Fausnaught with his frivolous and malicious abuse of legal process. Bryan Reo has bragged in the past that he would "purchase" the name of Ku Klux Klan from some derelict and then initiate spurious litigation against other Klan incorporations to make himself the leader of the Klan. Bryan Reo is doing much the same in an attempt to take over Dual-Seedline Christian Identity Churches on behalf of its friend William Finck and itself. http://www.whitenationalist.org/forum/showthread.php?1644

10.B Bryan Reo has also gloated that it is going to use litigation to render Pastor Lindstedt penniless by stealing under color of law the assets of Pastor Lindstedt and Lindstedt's Church and give some of it back to William Finck, another federal agent provocateur running a spurious Christian Identity ministry. See "Pray for My Success" of August 2014:

http://whitenationalist.org/forum/showthread.php?p=11266#post11266

http://mamzers.org/pastorlindstedt/lindstedt/legal/SoredMamzer/2014/Aug14/SueMarty_25Aug14-a-a.jpg

10.C. Therefore, while Pastor Lindstedt is constrained from having his Church as a victim of Bryan Reo legal assault as a party in this Amended Answer and Counter-Claim, Pastor Lindstedt wishes to make a claim that his and his Church's First Amendment rights to freedom of religion have been violated by Bryan Reo and Reo co-conspirators and make of it a federal question under 42 U.S.C. 1983 and other sections of the federal code as discovery progresses.

III. JURISDICTION AND VENUE

11. This Court acknowledges that "the court notes that it has jurisdiction over this matter." "Defendant properly removed the case to this court." This is on the basis of diversity of citizenship when the civil actions in controversy exceed \$75,000. However, it is a federal

question as well because Bryan Reo is asking for an unconstitutional "gag order" and seeking, along with his co-conspirators to violate the First Amendment civil rights of Pastor Lindstedt and Lindstedt's non-501(c)(3) Church using abuse of legal process and vexatious and frivolous litigation to shut them up about the truth about Bryan Reo and Bryan Reo co-conspirators like Reo's wife, father, and lawyer friends. Thus they are in a conspiracy under 42 U.S.C. 1983 and 1985. If the federal government is working Reo and Reo conspirators as agents provocateur and paying them through confiscation of Pastor Lindstedt's property then the federal government is being sued as well and this court has additional jurisdiction to hear the case. In no instance does Pastor Lindstedt to slip out of this matter once initiated by lessening the litigation amount below \$75,000 so Pastor Lindstedt is trying to use discovery to joinder additional Reo conspirators as well as counter-suing against Bryan Reo and Reo conspirators. Additionally the Lake County Court has admitted that "The jurisdiction of the common pleas court to enforce its orders is confined to the boundaries of the state of Ohio." Reo v. Lindstedt 15 CV 001590 & 16CV000825, Journal Entry 14 Jan. 2020. Perhaps in wanting to take these bogus Bryan Reo cases out of the corrupt Lake County Ohio Courts to this federal court Pastor Lindstedt has jumped out of the frying pan into the fire, as it is unlikely that Bryan Reo will ever get anything as a crazed butthurt antifa mongrel whining about Aryan Nations and Klan pastors insulting a homosexual mongrel in Missouri where Pastor Lindstedt has limited property held in common or in South Dakota where Pastor Lindstedt owns nothing now. So this federal court should follow sooner rather than later the precedent set in Jarndyce v. Jarndyce (Charles Dicken's novel Bleak House) and dismiss this and other endless Antifa v. White Supremacist Reo v. Lindstedt case(s).

IV. ANSWERING BRYAN REO LIES / REO 'FACTS' - 19CV001530 (this case removed)

12. Bryan Reo - #7 p3 said: Defendant has a long history of libeling Plaintiff and Defendant lost a jury trial in the consolidated cases of 16CV000825 and 15CV1590 with a verdict being rendered in Plaintiff's favor 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 \$105,000.00 against Defendant Martin Lindstedt.

12.Answer: Bryan Reo has a template in its bogus defamation cases against Pastor Lindstedt just as it has a template for its bogus TCPA cases. In any case, the jury trial was a corrupt farce and is presently under

appeal before the Ohio appellate court, where Bryan Reo seems to be unable to file an appellee brief or do anything other than ask for an extension of time and the endless Bryan Reo Motions to Strike under various sundry pretexts. In any case, the Lake County trial court recently admitted that it had no jurisdiction to force the issue of collection outside the boundaries of Ohio and it is unlikely that Bryan Reo will be able to get anything in Missouri or South Dakota. This fraudulent judgment might well be set aside. In any case Pastor Lindstedt has not said anything untrue about Bryan Reo and Reo's sundry antifa "White Supremacist" ZOG false-flag organizations. Pastor Lindstedt's reporting of this homosexual mongrel still playing at White Supremacy continues and so Bryan Reo and Reo's family have decided to gin up some outrage regarding how it/they has/have been defamed in an effort to steal from Pastor Lindstedt's inheritance. Reo has gotten its father and wife involved as well and so there are four (so far) of these cases transferred from the Lake County Ohio barratry & perjury parlor to this federal court. Pastor Lindstedt has nothing else to do other than to fight these matters out until Reo is disbarred or the System collapses because the only evil Pastor Lindstedt can do is to quit fighting these defensive actions.

12.A Counter-Claim Answer Bryan Reo has a long history of defaming Pastor Lindstedt since 2010 when Reo called Pastor Lindstedt a "convicted child molester" to trial of consolidated cases 15CV001590 and 16CV000825 well past the time that Pastor Lindstedt called Bryan Reo a homosexual mongrel and agent provocateur causing trouble for the White Supremacy movement back in 2010-2011. Bryan Reo is mentioning the years 2015-16 because Reo filed years after the Ohio one-year statute of limitations passed. A biased jury and a corrupt judge who allowed this case to proceed gave Reo a judgment totaling \$105,000 on mythical compensatory damages and to punish Pastor Lindstedt for racism and being a White Supremacist. Pastor Lindstedt's Church of Jesus Christ Christian / Aryan Nations of Missouri was assessed \$200 in compensatory damages and \$200 in punitive damages for speech and free exercise of religion. Bryan Reo is a limited purpose public figure within the Movement and thus this case absent jurisdiction never should have been tried in the first place. Reo is being counter-sued for still calling Pastor Lindstedt a "child molester" and a convicted one at that. Pastor Lindstedt is NOT a child molester

or pedophile, certainly not a convicted one at that and since Bryan Reo, friends and family falsely call Pastor Lindstedt a child molester then Pastor Lindstedt should be able to truthfully call Bryan Reo a homosexual crazed delusional mongrel ZOGbot.

13. Bryan Reo - #8-19 p3-4 said:. On August 9, 2019 [8/9/2019] Defendant published on the worldwide web a statement that Plaintiff had engaged in homosexual oral sex with a Missouri state trial court judge, called by Defendant "Judge Grindr-Greggie Stremel" to get a favorable ruling on the paperwork to domesticate the judgment that was duly recorded against Defendant in Lake County Court of Common Pleas in 16CV000825 and 15CV001590.

http://whitenationalist.org/forum/showthread.php?p=20206#post20206

13. Defendant's Answer. The post in question is twisted by Bryan Reo claiming that what was said was that Bryan Reo had engaged in sodomy with a Newton County judge – Grindr-Greggie Stremel. This is a lie by Bryan Reo. This isn't what was said. Rather what was published was a Bryan Reo extortionary e-mail demanding that Defendant have to pay a supersedeas bond when Missouri Revised Statutes 74.14(d) as well as Ohio law dealing with foreign judgments say that execution is stayed while on appeal – and the appeals from Bryan Reo's anti-First Amendment lawsuit from Lake County can go on for years. Pastor Lindstedt gave Bryan Reo's extortionary demands to Pastor Lindstedt via e-mail a facetious title implying that the Newton County judge would accept homosexual favors if offered. Bryan Reo is a notorious predatory homosexual which indulges in blackmail. The Newton County judge recused himself from hearing the case and sent it to a judge from another circuit who will obey Missouri (and Ohio) law regarding foreign judgments while on appeal as opposed to Bryan Reo's sundry interpretations of Ohio civil rules of court. Bryan Reo then proceeded to give a lecture on what it thinks the facts and law regarding what it thinks the case should be, which are largely self-serving nonsense for Bryan Reo's latest barratry attempt in Lake County now removed to federal court in this case.

13.A Defendant is hereby counter-suing for this Bryan Reo knowing lie/perjury and seeks damages and Reo disbarment for mis-stating the law and facts of this matter.

14. Bryan Reo paragraph 20, page 4: On September 6, 2019, [9/6/2019] Defendant published on the worldwide web a statement that Plaintiff was having a homosexual incestuous relationship with Plaintiff's own father, which would also entail Plaintiff participating in an extra-marital affair and cheating against Plaintiff's wife Stefani Rossi Reo,

NO LINK GIVEN PROVING THIS PERJUROUS ALLEGATION BY BRYAN REO.

14. Pastor Lindstedt's Answer & Counter-Claim: Bryan Reo engages in outright perjury on this one and provides no hyperlink to what Reo alleges Pastor Lindstedt published. Pastor Lindstedt wrote/published no such claim of incest between Bryan Reo and Reo's father. This perjury of both fact and law should be summarily punished by this Court imposing Federal Rule of Civil Procedure Rule 11 Sanctions upon Bryan Reo and all of the Bryan Reo and Reo family litigation against Pastor Lindstedt and Lindstedt's Church. What was said about Bryan Reo, its father and wife was put in a thread and then locked down since Pastor Lindstedt got word that Bryan Reo was filing a lawsuit on behalf of its wife. When the post was made there was the thinking that Bryan Reo's father was just another homosexual mongrel friend of Bryan Reo and neither of the two homosexual mongrels were having sexual relations with Mrs. Reo who was jumping about like a fool around in the courthouse halls trying to get their attention on 25 June 2019. No incest and certainly not heterosexual incest was implied or stated. See:

http://www.whitenationalist.org/forum/showthread.php?2101-Ol-Niggerlips-v-Mrs-Niggerlips

Defendant is hereby counter-suing for this Bryan Reo, Anthony Dominic Reo and Stefani Rossi Reo for knowing lies/perjury, abuse of legal process in filing these perjurous claims and seeks damages and Reo disbarment and possible criminal sanctions for mis-stating to the point of perjury the law and facts of this matter.

15. Bryan Reo paragraph 21-22, p 4 Complaint: Defendant posted the case caption of a domestic relations proceeding filed in February 2019 which involved a joint petition for dissolution of marriage as between Plaintiff and Stefani Rossi Reo. Defendant cast this filing into a false light and claimed that the reason for the breakdown in Plaintiffs marriage was that Plaintiff was a homosexual having homosexual sex with his own father. The reason Defendant gave for Plaintiff's marital difficulties was not only inaccurate, it simply did not contain any truth.

Defendant cast Plaintiff's marital difficulties in a false light.

15. Defendant's Answer & Counter-Claim: Pastor Lindstedt truthfully reports on Bryan Reo antics and crookedness. Bryan Reo admits that it sought a divorce from its Brazilian wife and in another public Quora posting claimed that its wife deceived Reo in claiming to want to have children in order to get admittance to America. Pastor Lindstedt merely reposted what Bryan Reo publicly posted on the Internet, not made it up out of whole cloth. Pastor Lindstedt merely re-posted Bryan Reo's Quora answer: "Would you marry a woman who didn't want children?" Bryan Reo has a Quora account in which Reo yaps idiotically about the law, Adolf Hitler and Nazi Germany, Napoleon and relationship advice among other things. The Hitler stuff is usually spot on as Reo thinks that he could pass for an SS officer. The relationship advice is what could be expected from a selfish homosexual mongrel and the post in question was especially absurd. Why should a Brazilian jewess wanting into the US married for appearances so that a homosexual mongrel wanting to pretend to be white and heterosexual be expected to have children? In any case, Bryan Reo took down that Quora post bemoaning Mrs. Reo's deceit in claiming to have wanted numerous children, and getting out of the divorce and separation by pretending to want at least one child, then when reconciled admitting to wanting none. Thus Bryan Reo makes perjurous charges against Pastor Lindstedt while deliberately destroying evidence of its own misconduct https://www.guora.com/Would-you-marry-a-woman-who-didnt-wantand deceit. children/answer/Bryan-Anthony-Reo

http://whitenationalist.org/forum/showthread.php?p=20225#post20225

Pastor Lindstedt is making a counter-claim against Bryan Reo for perjury and destruction of evidence showing its perjury and that of its wife Stefani Rossi Reo who is also being counter-sued for being used by her husband Bryan Reo for stealing through deceit Pastor Lindstedt's inheritance.

16. Bryan Reo paragraph 23 page 5. http://www.whitenationalist.org/forum/showthread.php?2101-Ol-Niggerlips-v-Mrs-Niggerlips&p=20294#post20294

16. Defendant's Answer & Counter-Complaint: Bryan Reo is complaining that Pastor Lindstedt is "vindictive" against its wife and father. The answer is that it is both of them being used in order to generate fraudulent litigation of \$500,000 each in order to steal by fraudulent litigation Pastor Lindstedt's South Dakota inheritance of 1800 acres of grassland worth around \$2 million. The Quora post that Bryan Reo deleted explains their relationship perfectly: Two jew/mongrel users each using each other for their own purposes with Bryan Reo being the more evil having the upper hand living with another selfish delusional mongrel namely Bryan Reo's father living in the same household. Pastor Lindstedt should not be maliciously sued for reposting what Bryan Reo posted for itself on the Internet and then took down because it made Reo look like what Reo is. Bryan Reo is a public figure and if it doesn't want to have Pastor Lindstedt to repost with an explanation Reo's own unedited words then it shouldn't post at all. Pastor Lindstedt is counter-suing both Bryan Reo, Reo's father and wife for their fraudulent litigation absent any merit.

17. Bryan Reo para 24, p 5 complaint: Defendant identified Plaintiff by name and provided sufficient information about Plaintiff's father such that Plaintiff's father could be reasonably identified from the context of the statement.

17. Defendant's Answer & Counter-Complaint: Defendant referring to Bryan Reo's father as "Old Niggerlips' Alleged Spawner" may well be unflattering but if one must do homework and study on it to ascertain the name of Bryan Reo's father then that isn't really reaching the level of defamation sufficient to support this fraudulent and bogus lawsuit seeking \$500,000 in damages for Bryan Reo much less another \$500,000 for its own self, cf. *Anthony Dominic Reo v. Martin Lindstedt* 19-CV-2615 now removed from Lake County to this federal district court. Insofar as what Pastor Lindstedt has to say about Bryan Reo's father the apple didn't fall very far from the tree, and Anthony Dominic Reo has allegedly spawned a worse mongrel than itself. Pastor Lindstedt is counter-suing both Bryan Reo and Reo's father Anthony Dominic Reo for pursuing and initiating this baseless, frivolous and malicious litigation against Pastor Lindstedt in order to unjustly enrich themselves through abuse of legal process.

18. Bryan Reo para 25-29, p 5. Incest is defined as a crime by Missouri Revised Statute 568.020 which provides that it is a Class D Felony if a person has sexual intercourse with an ancestor or descendant. Plaintiff has never had sexual relations with his father. Plaintiff, while married, has never had sexual relations with any person other than his wife Stefani Rossi Reo. Plaintiff has never had incestuous sex with any relative.

Plaintiff has never engaged in homosexual sexual conduct or contact with any man

18. Defendant's Answer & Counter-Claim: Bryan Reo is the one who made up the incest story about how Pastor Lindstedt allegedly claimed that there was incest between three jew mongrels living in the same house from a simple observation of two mongrels sitting together across from Pastor Lindstedt at trial on 25 June 2019 in the Lake County Courthouse ignoring the female mongrel jumping about like a fool trying to get their attention and not getting any. Pastor Lindstedt never said anything about incest. Bryan Reo and Bryan Reo's father are making a false claim against Pastor Lindstedt and thus are being counter-sued. Insofar as Reo's

denial of homosexuality, Pastor Lindstedt has no doubt that Bryan Reo is a predatory homosexual who blackmails other men into having homosexual sex with Bryan Reo due to observation of Bryan Reo and Bryan Reo behavior for nearly a decade. Pastor Lindstedt knows little about Bryan Reo's father and hasn't commented anything actionable about Bryan Reo's father. Thus both are subject to counter-suit for making false claims they attributed to Lindstedt.

- 19. Bryan Reo para 30-34 p5-6. On September 10, 2019 [9/10/2019] Defendant published on the worldwide web a statement that Plaintiff was extorting Defendant in violation of law despite the fact that no stay of execution on any judgment had been granted by that time [or by the time of the filing of this complaint] and despite the fact that Defendant had never posted a supersedeas bond to stay execution of the judgment in question. http://www.whitenationalist.org/forum/showthread.php?2177-Reo-v-Lindstedt-19NW-CV1809-in-Newton-County&p=20319#post20319
- 19. Defendant's Answer & Counter-Claim. Bryan Reo keeps on making demands to be paid the judgment of \$105,400 for himself against Pastor Lindstedt and his Church on the bogus trial held in Lake County which was then and is now presently on appeal. In the post above Bryan Reo was threatening a Sheriff's sale on Pastor Lindstedt's and Roxie Fausnaught's modest residence, which cannot happen under Missouri law. Both Missouri and South Dakota and Ohio law state that execution of a foreign judgment cannot take place while the case is under appeal. Yet Bryan Reo kept insisting on a supercedeas bond while Pastor Lindstedt has never recognized the jurisdiction of a Lake County Ohio court to drag an Aryan Nations pastor 900 miles for a kangaroo court trial before a Lake County Lynch Mob jury of negroes and liberals for "defamation" for calling Bryan Reo a crazed delusional antifa homosexual mongrel pretending to be a White Supremacist and documenting limited-purpose public figure within the Movement Bryan Reo's antics while Bryan Reo is calling Pastor Lindstedt a "child molester".

Bryan Reo is going to have a problem collecting this bogus judgment in either Missouri or South Dakota. Thus Pastor Lindstedt routinely posts Bryan Reo threats and extortionary threats on Pastor Lindstedt's Church forum for everyone to see. Yet Bryan Reo acts as if posting its emails making all manner of threats and extortions is somehow "defamatory." *New Information:* On 14 January 2020 the Lake County Judge Patrick Condon admitted that the Lake County Court had no jurisdiction to enforce its orders beyond the boundaries of Ohio. Bryan Reo must work to get its judgment enforced before a Missouri and/or South Dakota court which probability is unlikely. Thus Pastor Lindstedt was right to ignore or laugh at Bryan Reo's pitiful extortion attempts. Pastor Lindstedt is counter-suing Bryan Reo for knowingly making a false statement of facts and law in trying to justify Reo's baseless and frivolous lawsuit vs Lindstedt.

- **20.** Bryan Reo paragraph **35**, page **6**. Defendant has caused injury to Plaintiff in excess of five hundred thousand dollars (\$500,000.00)
- **20. Defendant's Answer.** With this claim Bryan Reo and Bryan Reo's wife and father have committed criminal fraud through abuse of legal process by these filing these frivolous lawsuits:

Bryan Anthony Reo v. Martin Lindstedt 1:19-cv-02103-SO

Bryan Anthony Reo v. Martin Lindstedt 1:19-cv-02589-CAB ← This one

Anthony Domenic Reo v. Martin Lindstedt 1:19-cv-02615-JRA

Stefani Rossi Reo v. Martin Lindstedt 1:19-cv-02786-CAB

With these four bogus and frivolous lawsuits they expect to steal through abuse of legal process Pastor Lindstedt's entire South Dakota inheritance of 1800 acres worth approximately \$2 million. Bryan Reo has plotted with William Finck to do so since its federal lawsuit back in August 2014, in its civil complaint filed in 19CV00001304 on page 11 under punitive damages

it asks for the entire \$2 million dollar property for its delusional and thieving demands for damages. Indeed it has already tried to extort Pastor Lindstedt for \$2,500,000 to "settle" in an email sent to Pastor Lindstedt on behalf of Reo's entire criminal family on Oct. 5, 2019.

http://whitenationalist.org/forum/showthread.php?p=20441#post20441

The screen shot of this extortionary demand has already been submitted to this court in Defendant's Doc. 13 Exhibit 1 filed on Oct. 10, 2019 in Reo v. Lindstedt 19-cv-2103.

http://bryanreo-lawsuits.xyz/2019/NewtonCounty/Oct19/5Oct19/BR2MLb 5Oct19 814pm.jpg

20.B Bryan Reo, Bryan Reo's father Anthony Dominic Reo and Reo's wife should be criminally charged and prosecuted for this extortionary scam as well as Reo sanctioned and disbarred for criminal activity as an officer of this federal and state court system. Pastor Lindstedt is counter-suing Bryan Reo, Stefani Rossi Reo and Anthony Dominic Reo in this and the other three cases that they have brought.

BRYAN REO'S AGENT PROVACATEUR CONSPIRATORS

21. Attorney Kyle Bristow. Attorney Kyle Bristow was the Chairman of the not-so-former Foundation for the MarketPlace of Ideas (FMI), also known as the ZOGbot Poverty [F]Law Center (ZPLC) and Bryan Reo was a mere "law student" and "law clerk" for Kyle Bristow. See: http://zogbots.xyz/WN/FMI-ZPLC/FMI-ZPLC_501c3.pdf In reality however, it was advertising itself as the "Southern Poverty Law Center" for White Supremacism and had leading elements of the Alt-Right and New Right such as Richard Spencer and "Mike Enoch" / Michael Enoch Isaac Peinovich and James Edwards of the radio podcast "The Political Cesspool" and the StormFront people and League of the South and the Traditional Youth Party and the National

Socialist Movement. All the elements of so called White Supremacy and White Nationalism working with this FMI institute. In reality, FMI was nothing more than a government run operation with the purpose of detecting any rising new talent and making sure that anything done would be ineffective much like the 1960s COUNTELPRO FBI operation. After the disaster at Charlottesville Virginia which in all likelihood was planned as a conspiracy, FMI would sue State university systems in Florida, Michigan, Pennsylvania and Ohio to let Richard Spencer speak on campuses to around a dozen or so skinheads who would get free tickets surrounded by hundreds of hostile students and antifa. This legal skirmishing paid Kyle Bristow, Bristow's law clerk and Brett Klimkowsky well. After a victory in January 2018 Bryan Reo was awash in postage for one of its mailings out of some of its vexatious Motions to Strike. The embarrassment was that FMI was full of jews and mongrels and race-mixers and homosexuals like Richard Spencer, Kyle Bristow and Bryan Reo and with Bryan Reo being particularly nonwhite and homosexual best kept in the background. When Bryan Reo was suing Pastor Lindstedt's Aryan Nations Church in early 2016 it was particularly embarrassing to have FMI crow about how they were going to "restore the freedumbs of the Constitution for the benefits of White Supremacists / Nationalists." Especially given that Bryan Reo especially was also antifa while pretending to be when convenient White Supremacists as well. Thus FMI is a 2016-19 COUNTELPRO. Recently Attorney Kyle Bristow is back to defending David Duke for their part in the Charlottesville Massacre so like Bryan Reo goes back to playing White Supremacist. During the past few months, whenever Pastor Lindstedt serves papers involving this Bryan Reo litigation upon Attorney Bristow, Bristow and Reo both file responses within an hour, even ten minutes of each other and both go on to call Pastor Lindstedt a child molester. Therefore Bristow and Reo are still working in concert with each other both as "White Supremacists" and

against Pastor Lindstedt. Thus Pastor Lindstedt is counter-suing Attorney Bristow as with Reo.

22. Attorney Brett Klimkowsky. Also on the Board of FMI, See: http://zogbots.xyz/WN/FMI-ZPLC/FMI-ZPLC 501c3.pdf Brett Klimkowsky acted as Bryan Reo's attorney sockpuppet for many of its TCPA scams. Brett Klimkowsky and Bryan Reo got caught lying in both federal and Lake County Courts for their lawsuits against the National Auto Division. While FMI officially shut down in early March 2018, when Bryan Reo was making post-trial Motions for Attorney Fees in 15CV001590 and 16CV000825 for Reo's win against Pastor Lindstedt and Lindstedt's Church, Bryan Reo induced Brett Klimkowsky to make an affidavit for \$4200 in attorney's fees as a signatory to Bryan Reo's draftings. Kyle Bristow drafted up the Motion for Attorney's Fees while Bryan Reo drafted up Motions for Sanctions. Thus these three lawyers for the FMI are still working together as a federal government COUNTELPRO cell against Old White Supremacist organizations such as Aryan Nations and leaders such as Pastor Lindstedt. Thus the federal government is funding its own anti-domestic terrorism operations against what the federal government views as decentralized secret potential domestic terrorist old-line White Supremacist groups and leaders like Pastor Lindstedt and Lindstedt's Aryan Nations DSCI Church of Jesus Christ Christian. The State of Ohio and the Lake County Courts / Judge Patrick Condon in particular are out to cripple and destroy Pastor Lindstedt and Lindstedt's Church by heavily putting their thumb on the scale of pretend justice by giving Bryan Reo a win in their kangaroo defamation court.

23. Wherefore Pastor Lindstedt is adding Attorney Kyle Bristow (who Pastor Lindstedt suspects of having a homosexual relationship with Bryan Reo) and Attorney Brett Klimkowsky as continuing co-conspirators against Pastor Lindstedt and Pastor Lindstedt's Church to this lawsuit, looking to gain \$500,000 from each of these lawyers in compensatory and punitive

damages, and seek civil and criminal sanctions against Bristow and Klimkowsky and their disbarment forever so that they cannot oppress and harass under color of law anyone ever again.

24. The rest of the Board of the Foundation for the MarketPlace of Ideas / William Finck. These people were working with Bryan Reo ostensibly to advance the cause of white Supremacy through "lawfare" like the Southern Poverty Law Center but in actuality they were nothing but poseurs and criminals working for the federal government in order to unearth new blood wanting to do something about White Genocide. Thus they were called the ZOGbot Poverty [F]Law Center (ZPLC). Attorney Kyle Bristow was the "Executive Director", Bryan Reo was "Director of Legal Research", and Brett Klimkowsky was another Board Member. They brought on other major people in the Movement like Richard Spencer and Mike "Enoch" Peinovich and James Edwards and Jason Robb, Thom Robb's lawyer son. They spent money on Charlottesville. See page 2, 2017 501(c)(3) IRS short form: http://zogbots.xyz/WN/FMI-ZPLC_501c3.pdf Therefore like William Finck as discovery progresses Pastor Lindstedt might well wish to joinder officers of this false-flag outfit into the Bryan Reo litigation as Bryan Reo co-

THE LAKE COUNTY OHIO COURT / JUDGE PATRICK CONDON

conspirators against Pastor Lindstedt and Lindstedt's Church.

25. Pastor Lindstedt is suing the Lake County Ohio Court in general and Judge Patrick Condon in their official and personal capacities before this federal court *simply because they lack jurisdiction to hear* the never-ending frivolous and malicious litigation for "common-law" defamation for what was said many years ago well past the Ohio Statute of Limitations about Bryan Reo, a public figure of infinite maliciousness working as an agent provocateur and informant for the federal and Ohio state government for what was reported by Pastor Lindstedt and on behalf of Lindstedt's Church over the Internet. The Lake County Court has not the power to in effect repeal the First Amendment promising freedom of

(political and religious) speech, of the press, and most certainly the exercise of religion by holding spurious unjust unfair irregular tribunals and to assemble a local lynch mob to try unpopular religious and political figures under rules which are not uniform.

26. Bryan Reo was allowed at trial to repeatedly call Pastor Lindstedt a "convicted child molester" (like Bryan Reo already done in documents to this Court in these cases). Bryan Reo was allowed to present cherry-picked portions from Pastor Lindstedt's web pages taken out of context. Bryan Reo was allowed to escape any potential of being tried for abuse of legal process and congratulated for its tortuous interference in taking down Lindstedt's web pages. Judge Condon packed the jury with one female African and seven liberals. Part of the pretense of claiming jurisdiction under *Kauffman Racing Equipment., L.L.C., v. Roberts,* 126 Ohio St.3d 81 is the promise of "substantive due process" – which definitely was not there. Now while this case is still in appeals and Pastor Lindstedt has asked that the Lake County Lynch Mob jury decision be overturned or for a new trial even though there never should have been a trial in the first place. And if necessary let the matter go onto appeal before the Ohio 11th Court of Appeals and then onward to higher courts.

27. But what Pastor Lindstedt is seeking in this federal Court today with this litigation is an end to the judicial tyranny and corruption of being under the power of the Lake County Court of Common Pleas for yesterday, today and tomorrow from Bryan Reo's vexatious and abusive litigation because the Lake County Court should have no power over someone living 900 miles away in another state for what was spoken or written as the truth about someone like Bryan Reo, a public figure of infinite malice against Pastor Lindstedt and Lindstedt's Church who is literally demanding a "gag order" for what is said in criticism against Bryan Reo and Reo's informant and agent provocateur friends. Pastor Lindstedt is

asking for all of Bryan Reo's frivolous and abusive litigation created for the sole purpose of stealing Pastor Lindstedt's South Dakota inheritance be removed to this federal court along with whatever new and old litigation ginned up and rubber-stamped by the Lake County Courts. Asking that Bryan Reo and Bryan Reo's family and friends risk losing their property and law licenses and be imprisoned for perjury and abuse of legal process when they dare to try and steal under color of law. And that this abuse absent jurisdiction be curtailed by forcing the Lake County Courts to recognize the limits of their jurisdiction before they wind up like Sodom and Gomorrah and the other Cities of the Plain who in their greed waylaid strangers and murdered and stole from them under color of their self-serving "law."

28. Pastor Lindstedt is counter-suing the Lake County Court in general and Judge Patrick Condon in particular in both their personal and official capacities not for monetary relief other than for Pastor Lindstedt's damages but for declaratory and injunctive relief against them ever again claiming any jurisdiction to hear cases brought by litigants like Bryan Reo against Defendants residing and doing their personal or organizational business outside the State of Ohio from being brought before a county court to be treated under color of law like Pastor Lindstedt and Lindstedt's Church were treated. This sort of barratry must end.

THE STATE OF OHIO

29. In addition to curbing the excesses of the Lake County Court of Common Pleas sans jurisdiction Pastor Lindstedt is asking a federal question as to why the State of Ohio, in its claims to suppress the unauthorized practice of law thus allows Attorney Bryan Reo to sue a non-profit Christian Church like the Church of Jesus Christ Christian / Aryan Nations of Missouri and its officers, one of them an illiterate elderly bed-bound woman in her 60s with a broken hip who

cannot even spell "Bryan Reo" correctly simply because they hold the religious position that a homosexual mongrel of infinite evil cannot join their Body of Christ? It is not as if the Aryan Nations of Missouri was like the Roman Catholic clergy raping boys and girls as part of communion. Yet the Lake County Court of Common Pleas has allowed Bryan Reo to sue for damages both compensatory and punitive of \$400. What did the Church say or do that they should be punished after not being allowed to speak in their own defense by their own clergy? And is the State of Ohio prepared to deal with the traditional means of religious minorities whose religious practice to defend same by means of religious warfare? Has the State of Ohio forgotten the lessons of the Thirty Years War? Wherefore Pastor Lindstedt summons the State of Ohio to appear before the federal district court to hear further of this matter in this particular cause. 30. Pastor Lindstedt is suing the State of Ohio, its bar association, on behalf of Pastor Lindstedt's Church as well as Pastor Lindstedt under a federal question namely 42 U.S.C. 1983 and 1985 for its violation of Pastor Lindstedt and Pastor Lindstedt's First Amendment right to Freedom of Speech and of the Press in publishing Bryan Reo's and Reo co-conspirators misconduct in pretending to be White Supremacists and Christian Identity and being sued for this exercise of the supposed civil rights and for the exercise of their racial religion in spurning Bryan Reo's and William Finck's and others in publicly stating that a homosexual mongrel Satanic abomination such as Bryan Reo is unfit to join with the Aryan Christian Israelite Body of Christ. Furthermore, by usurping privileges such as patents of nobility to "practice law" while denying a Church its right to even a defense by a member of its Church Body is an egregious violation of religious practice. All Pastor Lindstedt's Church ever did was to purchase Internet hosting. Bryan Reo was allowed to sue not only the Church but a 63-year-old bedbound illiterate woman like Roxie Fausnaught who never did Bryan Reo any harm and couldn't even spell "Bryan Reo" correctly.

This was a deliberate abuse of legal process without any legitimate social value on the part of the Lake County Courts and Judge Condon, but of the State of Ohio wanting to preserve a "legal monopoly" on the part of an unregulated bar association. This never should have happened and this sort of misconduct must stop, therefore Pastor Lindstedt is suing the State of Ohio for civil rights violations under 42 U.S.C. 1982 & 1985.

THE UNITED STATES FEDERAL GOVERNMENT

30. Every Mighty Evil Empire on the way down and out of History thinks that if only it can gin up an army of informants and agents provocateur infesting its rebellious native population that it can stay in power and control forever. The regimes of Charles I, Louis XVI, Czar Nicholas and far more despots found out differently. This is especially the case when its army of informants and agents provocateur consist of evil homosexual mongrels like Bryan Reo who can never ever pass for White, along with the feckless bunch such as the false-flag Foundation for the Marketplace of Ideas (FMI/ZPLC), some of whom are being counter-sued today.

31. The problem with running a COunter INTELligence PROgram [COINTELPRO] with such defectives as Bryan Reo is that when this regime imagines it has destroyed the sundry groups able to somehow work together then what is left are a atomized pack of "lone wolves" or rather "Lone Tards" who engage in random violence shooting up Walmarts or public schools or where-ever there is a mob of unarmed targets waiting for the shooters. When informants and agents provocateur like Bryan Reo are allowed to use their local corrupt county courts to steal and oppress their enemies who have detected them and are blowing the whistle about them and they are summoned to appear before corrupt tribunals to have their lives liberty and property stripped from them that that too creates bad feeling. The pretense that there is a First Amendment or Rule of Law is fading fast. Why is the First Amendment being allowed to be destroyed by these

informants and agents provocateur? As with the State of Ohio Pastor Lindstedt is suing the U.S. government for civil rights violations under 42 U.S.C. 1982 & 1985.

V. TRIAL BY JURY DEMANDED

32. Defendant 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

- **33.** The foregoing paragraphs of this Answer / Counter-Complaint are incorporated by reference as if fully set forth herein.
- **34.** Defendant denies publishing false and defamatory statements about Plaintiff to third-parties via the medium of the World Wide Web. Rather Defendant published public records and Plaintiff's own words and submissions while Plaintiff kept on maliciously libeling Defendant as

a "child molester". Defendant is suing Bryan Reo and some Reo counter-defendants for doing so.

- **35.** Defendant's true statements about Plaintiff were made by Defendant without need for any privilege given that they were about a limited-purpose public figure like federal antifa informant and ZOGbot Bryan Reo within the White Supremacist and Christian Identity Movement.
- **36.** Defendant acted without any negligence in making accurate and true statements about Plaintiff Reo & Reo Counter-Defendants and Plaintiff's & Reo's motivations.
- **37.** Defendant acted reasonably in attempting to discover the truth or falsity of Bryan Reo's past and current history pertaining to pretending to be something it was not, i.e. a white supremacist or competent or ethical attorney in publishing commentary about Plaintiff.

- **38.** Defendant's true and accurate statements about Plaintiff are not defamatory per se insofar as said statements reflect upon the character of Plaintiff by bringing him into ridicule, hatred, or contempt, which are the expected results for Plaintiff's actions and while the truth might well affect Plaintiff injuriously in his future trade or profession this is what is to be expected given limited-purpose public figure's Plaintiff's known or suspected behavior and conduct.
- **39.** Defendant's true and largely accurate statements about public-figure Plaintiff are not defamatory per se to the extent that some of the statements in question would lead to allegations or accusations of criminal conduct in violation of various sections in the Ohio Revised Code.
- **40.** Defendant did not commit against public figure Plaintiff the common law tort of libel per se because Plaintiff has no "right" to before the public pretend to be a virtuous lawyer while before a different Internet audience pretend to be a White Supremacist / Nationalist or Christian Identity leader or policy maker. Bryan Reo had many chances to leave pretending to be a White Supremacist leader but instead has seen fit to file these frivolous and malicious litigation against Defendant as a personal enemy.
- 41. Rather Plaintiff Bryan Reo, Reo co-conspirators Stefani Rossi Reo and Attorney Kyle Bristow have knowingly libeled per se Pastor Martin Lindstedt by continually libeling him as a "convicted child molester" or "pedophile" from 2010 to at trial in June 2019 to today in e-mails while perfectly aware that this matter didn't even proceed to a preliminary hearing much less conviction or incarceration. The notion of Bryan Reo is that they get to libel Pastor Lindstedt while suing Pastor Lindstedt for innocuous statements of opinion and true fact posted upon the Internet. All the parties counter-sued today are the libelers or Bryan Reo libel enablers. Pastor Lindstedt is counter-suing them for these above reasons.

COUNT II COMMON LAW INVASION OF PRIVACY – FALSE LIGHT

- **42.** The foregoing paragraphs of this Answer / Counter-Complaint are incorporated by reference as if fully set forth herein.
- **43**. Defendant made no false and derogatory statements about Plaintiff that Defendant publicized via the medium of the World Wide Web. Rather these statements were substantially true.
- **44.** These truthful and informative statements made by Defendant about Plaintiff placed Plaintiff before the public in a accurate light.
- **45.** The true and accurate statements made by Defendant about limited-purpose public figure Plaintiff Bryan Reo are highly offensive only to people who wish to be offended, and not to a reasonable person who probably don't care one way or another about Bryan Reo or Reo history.
- **46.** Defendant is not at fault and knew or acted responsibly as to the truth of the statements made by Defendant that concern Plaintiff.
- **47.** As a direct and proximate result of Defendant's statements about Plaintiff, Plaintiff has been and will continue to suffer largely imaginary and mythical damages claiming mental anguish and reputational injury. Bryan Reo abandoned many chances to stop fighting with Pastor Lindstedt but instead insisted on filing these fraudulent and frivolous litigation seeking a payback before a judge and jury located within its chosen venue as opposed to Pastor Lindstedt's home territory.
- **48.** Defendant didn't commit against limited-purpose public figure Plaintiff Bryan Reo the tort of invasion of privacy false light. Rather Plaintiff Bryan Reo and the Reo conspirators are committing against Defendant Pastor Martin Lindstedt the tort of abuse of legal process, malicious prosecution, etc. as well as invading Pastor Lindstedt's privacy

COUNT III COMMON LAW INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

- **49.** The foregoing paragraphs of Defendant's Answer & Counter-Complaint are incorporated by reference as if fully set forth herein.
- 50. By and through publishing largely truthful statements of fact about Plaintiff to third parties via the medium of the World Wide Web, Lindstedt engaged in First Amendment protected conduct. Anti-Racist Activist Bryan Reo decided to pretend to be a White Supremacist one minute, called Pastor Lindstedt a "convicted child molester" and then when Reo learned Pastor Lindstedt had an inheritance to steal promptly destroyed evidence of its conduct, has tried to take down Lindstedt's web pages and proof of Reo misconduct, and filed these frivolous legal actions in Lake County Ohio and Ohio federal court. Bryan Reo could have left off fighting with Pastor Lindstedt but that would mean not being able to steal Pastor Lindstedt's assets or silence under color of law Pastor Lindstedt and that did not suit Bryan Reo's malicious purposes.
- **51.** Lindstedt denies acting with an intentional or reckless *scienter* when Lindstedt published these true statements of fact and opinion about public figure Plaintiff.
- 52. Due directly and proximately to Lindstedt publishing these true statements of fact about Plaintiff, Plaintiff has claimed, falsely severe emotional distress in the form of vexation, irritation, anxiety, frustration, and hatred. All these emotions are part and parcel of being Bryan Reo. Bryan Reo has instead been the one stalking Pastor Lindstedt and this conflict would have ended back in 2010 if Bryan Reo didn't want to continue this conflict altogether of Bryan Reo's making aided and abetted by Bryan Reo's family and lawyer friends.
- **53.** Lindstedt not liable to Plaintiff for common law intentional infliction of emotional distress, but rather Bryan Reo and the Reo family are responsible for this vexatious and frivolous and malicious litigation.

COUNT IV PERMANENT INJUNCTION / PERMANENT DISBARMENT OF BRYAN REO

- **54**. The foregoing paragraphs of Defendant's Answer & Counter-Complaint are incorporated by reference as if fully set forth herein.
- 55. The improper and unlawful conduct of Plaintiff in making this frivolous and malicious litigation is made overt by Bryan Reo continuing to demand a "gag order" on Pastor Lindstedt continuing to report on Bryan Reo misconduct. Demanding permanent injunctive relief from publication by Plaintiff about Bryan Reo misconduct shows that the goal of Bryan Reo litigation is censorship and improper enrichment through abuse of legal process, not justice.
- **56.** In the absence of the entry of a permanent injunction by the Court, Plaintiff will suffer no serious or irreparable harm and injury, but rather be known for his true reputation.
- 57. The entry of a permanent injunction will harm or burden Defendant because Defendant is allowed under the First Amendment of the US and of Ohio to speak freely concerning public figure Bryan Reo who has pretended to be one of us White Supremacists or Christian Identity. Bryan Reo saying otherwise merely goes to show Bryan Reo's motivations are evil and corrupt. There would be no such thing as a World Wide Web if left to the likes of Reo
- **58.** Public policy favors at least the pretense of a First Amendment protecting the Free Exercise of Speech, of the Press, and of Religion, not pre-publication censorship of embarrassing truths concerning limited-purpose public figure Bryan Reo. This public policy thus favors the entry of a permanent injunction and disbarment of Bryan Reo from filing this sort of malicious litigation against Pastor Lindstedt, Lindstedt's Church and against others by Bryan Reo and Reo's fellow lawyers, especially those working as agents provocateurs in Reo's FMI..
- **59.** Plaintiff has the adequate remedy available at law of proper behavior including not filing these frivolous litigation attempts to enrich himself, his family and friends at Pastor Lindstedt's expense. The First Amendment is not to be set aside because Bryan Reo doesn't like criticism.

60. Plaintiff is not entitled to a permanent injunction in which Defendant is compelled to remove from the World Wide Web and not republish thereto any and all of these unflattering but truthful materials Defendant or Defendant's agents (Pastor Lindstedt has no agents) published there about Plaintiff. Merely asking for this destruction of the First Amendment in the face of case law prohibiting these gag orders is proof positive that this litigation by Bryan Reo is for purpose of unjust enrichment and censorship against Pastor Lindstedt.

COUNT V BRYAN REO'S DESTRUCTION OF EVIDENCE

- **61**. The foregoing paragraphs of Defendant's Answer & Counter-Complaint are incorporated by reference as if fully set forth herein.
- **62.** Bryan Reo has deliberately destroyed evidence which reveals Bryan Reo misconduct, perjury or simply putting words in Pastor Lindstedt's mouth in order to make a legal argument, such as with the public Quora post lamenting Mrs. Reo's deceit in promising to bear children in order to get married and to avoid divorcement. Or with Pastor Lindstedt supposedly yapping about homosexual incest when Pastor Lindstedt said no such thing.
- **63**. Bryan Reo should be summarily sanctioned for such conduct and as it keeps on occurring disbarred for this misconduct.

VI. PRAYER FOR RELIEF

Judge Christopher Boyko ORDERED Defendant Pastor Martin Lindstedt to file an Amended Answer compliant with the Federal Rules of Civil Procedure within 14 days of receipt of his ORDER of January 17, 2020 (Doc 16) (received on Jan 21, 2020). Defendant has cut down quite a bit of the racism which is inherent in the decade-long conflict between Plaintiff Bryan Reo who used to pretend to be a fellow White Supremacist / Christian Identity even though he wasn't white and Defendant Pastor Martin Lindstedt who has been truthfully reporting about

limited-purpose public figure or public figure Bryan Reo. Defendant has answered Bryan Reo's claims, practically all of which are perjurous and involve Bryan Reo lying about the facts or the law or both. Defendant has clearly and plainly stated why he is counter-suing Bryan Reo, Bryan Reo's father and wife, and Reo fellow attorneys Kyle Bristow and Brett Klimkowsky conspiring with Bryan Reo to steal Pastor Lindstedt's property via abuse of legal process and fraud.

Defendant is suing the Lake County Court and Judge Patrick Condon for holding a corrupt proceeding against Pastor Lindstedt and Lindstedt's Church absent any or all jurisdiction to do so. Pastor Lindstedt is suing the State of Ohio for granting patents of nobility to lawyers and thus preventing churches from being defended by their clergy in violation of the First Amendment using civil rights laws. Pastor Lindstedt is suing the federal government for letting their agents provocateur like Bryan Reo, Kyle Bristow and Brett Klimkowsky run wild in disrupting White Supremacist and Christian Identity dissent, also under 42 U.S.C. 1983 & 1985.

This is at present as good as Pastor Lindstedt can do as a "good faith" effort. Doubtless Bryan Reo will file numerous Motions to Strike as that is all Bryan Reo is capable of doing. Pastor Lindstedt again requests the ability to file electronically in response to the torrent of Bryan Reo litigation, of Motions to Strike and of Reo pretending that it simply does not understand even after a decade of conflict within the White Supremacy and Christian Identity Movements and unrestricted "lawfare" since 2014 what & why Pastor Lindstedt says about Reo.

WHEREFORE, Defendant Pastor Martin Lindstedt prays that this Court will enter judgment against Plaintiff Bryan Reo (and Bryan Reo co-conspirators) in Defendant's favor in an amount of money that exceeds two million five hundred thousand dollars (\$2,500,000.00) for general and special damages, award Defendant punitive damages against Plaintiff in an amount the Court deems just and proper, award Defendant all costs associated with maintaining the

instant civil action, award Defendant all pretrial and post-trial interest on any and all monetary relief awarded to Defendant, award Defendant injunctive relief by sanctioning Bryan Reo from trying to regulate / censor the World Wide Web through this frivolous litigation and to disbar Bryan Reo. Kyle Bristow, and Brett Klimkowsky from being officer of this Court, and award Defendant all other relief to which Defendant is entitled as a matter of law or equity.

Hail Victory!!!



Pastor Martin Lindstedt, Defendant of and for

The Church of Jesus Christ Christian / Aryan Nations of Missouri (pastorlindstedt@gmail.com) 338 Rabbit Track Road, Granby Missouri 64844 (Tel #) 417-472-6901

1 Feb 2020

Certificate of Service

I, Pastor Martin Lindstedt do hereby certify that a true and genuine copy of the foregoing Answer / Counter-Suit / Counter-Claims has been dispatched by United States mail on 1 Feb 2020 (within 14 days of the receipt of the Judge's Order delivered 21 Jan 2020) to Plaintiff Bryan Reo at:

Plaintiff Attorney Bryan Reo, 7143 Rippling Brook Lane, P.O. Box 5100, Mentor Ohio 44061

A Summons shall be sought and served or sent with a "Waiver of Service of a Summons" with to the following:

Stefani Rossi Reo with Attorney Bryan Reo as her lawyer. 7143 Rippling Brook Lane P.O. Box 5100, Mentor Ohio 44061

Anthony Dominic Reo with Attorney Bryan Reo as his lawyer, 7143 Rippling Brook Lane, P.O. Box 5100, Mentor Ohio 44061

Attorney Kyle Bristow, Esq. 42383 Garfield Rd, Mt. Clemens MI, PO Box 381164 Clinton Twp 48038

Attorney Brett Allan Klimkowsky, Esq. P.O Box 114, Martin Ohio 43445 (419-360-1738)

Lake County Court of Common Pleas / Judge Patrick Condon is Lake County Courthouse, 47 North Park Place, Painesville, Ohio 44077

State of Ohio, Ohio Attorney General, 30 E. Broad Street, 14th Floor, Columbus, Ohio 43215

U.S. Attorney for the Northern District of Ohio Justin Herdman, 801 W. Superior Avenue, Suite 400, Cleveland Ohio 44113-1852

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