

**STATE OF OHIO
IN THE COURT OF COMMON PLEAS OF LAKE COUNTY
CIVIL DIVISION**

BRYAN ANTHONY REO,

Plaintiff,

v.

MARTIN LINDSTEDT,

Defendant.

Case No. 15CV001590

Hon. Richard L. Collins

PLAINTIFF'S RESPONSE
TO DEFENDANT'S REQUESTS
FOR ADMISSION

BRYAN ANTHONY REO

7143 Rippling Brook Lane

Mentor, OH 44060

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Pro se Plaintiff

MARTIN LINDSTEDT

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Granby, MO 64844

(P): (417) 472-6901

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Pro se Defendant

PLAINTIFF'S RESPONSE TO DEFENDANT'S REQUESTS FOR ADMISSION

Pursuant to Rules 26 and 36 of the Ohio Rules of Civil Procedure, Plaintiff Bryan Anthony Reo responds to Defendant Martin Lindstedt's Requests for Admissions as follows:

- 1) Admit that you, Bryan Reo, as part of a criminal conspiracy involving others, are being sued in the instant civil action for intentional torts primarily conducted through the World Wide Web, but which also involve extortion, fraud and conspiracy to destroy the civil rights of freedom of speech and religion of Pastor Lindstedt and Lindstedt's Church of Jesus Christ Christian / Aryan Nations of Missouri (Hereafter Pastor Lindstedt's Church).

Response: Deny as untrue. Further responding, Plaintiff has no idea what, if anything, he is "being sued" for because Defendant's purported counter-claim is an incomprehensible rambling.

- 2) Admit that Plaintiff is a natural person residing in Lake County Ohio living with his father, Anthony D. Reo, who provides for Plaintiff and is engaged in a criminal conspiracy along with his son, Bryan Reo, to defraud others through frivolous and malicious abuse of legal process.

Response: Plaintiff admits that Plaintiff is a natural person living in Lake County Ohio. Plaintiff admits that Plaintiff lives with his father. Plaintiff denies the remainder of the paragraph, further stating that Plaintiff pays his own bills.

- 3) Admit that Plaintiff is a not private figure, what with claiming to run for public office, but most tellingly, in this case, having pretended as an Anti-Racist Activist to be an Aryan Christian Identity sub-pastor and White Supremacist, and having numerous blogs and forums pretending to be an authority within Christian Identity and White Nationalism. However, in order to make interstate terroristic threats and engage in criminal conspiracies, Bryan Reo used the alias of "SwordBrethren" then, and another alias now. The bogus and fraudulent claim to being a "private figure" is so that this fraudulent and vexatious case won't be dismissed out of hand.

Response: Deny as untrue.

- 4) Admit that Defendant Pastor Martin Lindstedt, while a natural person residing in Granby Missouri, is head of a Church corporation in good standing in Missouri, and that you and other co-conspirator counter-defendants, presently known and unknown, have knowingly and maliciously and unlawfully destroyed Church property under color of the Digital Millennium Copyright Act (hereafter the DMCA) in order to stifle Pastor Lindstedt's and Lindstedt's Church's freedom of speech and religion.

Response: Plaintiff, upon information and belief, admits that Defendant Martin Lindstedt is a natural person residing in Granby, Missouri. Plaintiff denies the next portion of the paragraph for want of information in regards to the corporate status of any church Defendant may or may not own. Plaintiff denies the remainder of the paragraph as untrue.

- 5) Admit that Lake County Court of Common Pleas in Lake County Ohio has no subject matter jurisdiction over the instant civil action, but rather was used as the next place to file a vexatious and frivolous and malicious lawsuit against Pastor Lindstedt eight days after Bryan Reo's frivolous and malicious case was flushed from the federal courts in Ohio and Missouri. Due to the Ohio Statute of Limitations being one year, 99% of Reo's case is barred from Reo being able to refile before this Ohio court.

Response: Deny as untrue.

- 6) Admit that Lake County Court of Common Pleas has no personal jurisdiction over Defendant Pastor Martin Lindstedt, but is merely Case #27 of a now current thirty cases filed for purposes of fraud by you, Bryan Reo with the connivance of your father, Anthony D. Reo..

Response: Deny as untrue.

- 7) Admit that Lake Country Court of Common Pleas in Lake Country Ohio is an improper venue for the litigation of this case but because the federal case was ruled as "frivolous", "baseless" and "futile" on Sept. 10, 2015, you then ran on down to re-file pretty much the exact same case before this present court on Sept. 18, 2015.

Response: Deny as untrue.

- 8) Admit that Plaintiff first came into contact with Pastor Lindstedt, in early 2010, and that Pastor Lindstedt, knowing that Bryan Reo wasn't what he claimed to be, made it Lindstedt's mission to discover the real-life identity of Plaintiff for the sake of embarking on a campaign to end Plaintiff's anonymous & cowardly criminal activity & cyber-terrorism, and give Plaintiff a deserved reputation as a non-white mongrel working with the jews William Finck and Eli James to change Dual-Seedline Christian Identity theology.

Response: Deny as untrue.

Response: Deny as untrue.

- 9) Admit that the claims that Defendant at some time years ago . . . “published the false and defamatory statements about Plaintiff as detailed in Paragraph 8 of the Complaint, and that Defendant had actual or constructive knowledge to believe that Plaintiff does not support child molestation and Plaintiff is not a homosexual, a drug dealer, a con-man, a murderer, a pawn store owner, or a “Jewish pimp,” and that Plaintiff does not engage in insurance fraud, and Plaintiff does not have syphilis or any other venereal disease” is merely fraudulent lies made up by Plaintiff to claims that Plaintiff made in the first place.

Response: Deny as untrue.

- 10) Admit that in March of 2011, as a result of Bryan Reo maliciousness in getting involved in federal litigation of a now-current co-conspirator counter-defendant John Britton, that John Britton’s lawyer gave to John Britton and then John Britton gave to Russell Walker a public LexisNexis report containing Plaintiff’s voter registration, political party affiliation, vehicle registration, vehicle license plate number, and partial social security number and then Russell Walker publicly disseminated this confidential information via the medium of the World Wide Web to a significant number of third-parties. Admit Bryan Reo has committed an act of perjury to two federal courts and two federal judges and now this Lake County Court and judge in claiming that Pastor Martin Lindstedt was the party responsible when in a Lake County Sheriff’s Office complaint dated March 7, 2011, Bryan Reo says otherwise. Admit to committing acts of perjury concerning this matter, beg for the dismissal of this current action and all others before the Lake County Court of Common Pleas, and request only a middling jail sentence or prison time for committing this third-degree felony in Ohio.

Response: Deny as untrue.

- 11) Admit that in what is the only matter which fits within the Ohio Statute of Limitations that between March and July of 2015 Pastor Lindstedt published the sundry Motions in the federal case in response to Bryan Reo's flurry of motions which ended in the federal judge dismissing Reo's fraudulent and frivolous federal litigation which are a matter of public record. These Motions declared that Plaintiff had committed perjury, wire fraud, and mail fraud, and was engaged in fraudulent conduct in a then ongoing federal court proceeding which was dismissed because of Plaintiff's perjury, wire fraud, and mail fraud fraudulent conduct and are thus not actionable before this Ohio court.

Response: Deny as untrue.

- 12) Admit that Plaintiff has always committed perjury, wire fraud, or mail fraud and while engaged in fraudulent conduct, especially before the relevant court proceeding, but has been unsuccessful in getting such actions to remain hidden, especially given Pastor Lindstedt's Church web pages documenting this fraud, perjury and misconduct.

Response: Deny as untrue.

- 13) Admit that due directly and proximately to Pastor Lindstedt's defending in court proceedings and posting these matters to the Internet, that Plaintiff as detailed within the Complaint, Plaintiff has suffered damage to Plaintiff's reputation which will adversely affect Plaintiff's ability to procure employment in the future, and Plaintiff has suffered mental anguish as a psychotic narcissistic sociopath in the form of anger, stress, frustration, anxiety, humiliation, and disgust. Why, it is just a matter of time before as Saint Hiram of Reppert allegedly said, that Bryan Reo is the "next school shooter." Plaintiff is no longer able to threaten to murder old ladies making fun of William Finck's supposed Greek scholarship or threaten to rape women and children with anonymous impunity. Bryan Reo isn't able to work as a policeman, or at a nuclear power plant, or any position requiring a psychological profile or security clearance. In fact, Bryan Reo isn't able to work at all, given that Bryan Reo sues anyone stupid enough to hire him for

the week or so Bryan Reo lasts. The only reason Bryan Reo continues in this fraudulent case knowing that every single page will be plastered on the Internet is because Bryan Reo wants to receive public assistance for its mental disease or defect within the moral structure provided by a prison or psychiatric facility.

Response: Deny as untrue.

- 14) Admit that Pastor Lindstedt hasn't caused Plaintiff any real undeserved damages whatsoever, much less in excess of twenty-five cents. (\$0.25).

Response: Deny as untrue.

- 15) Admit that Bryan Reo previously sued Pastor Lindstedt in federal court over the controversy at issue in the instant civil action, but said civil action was dismissed without prejudice within the past year for lack of subject matter jurisdiction due to diversity jurisdiction not being properly shown by Plaintiff and because the claims by Reo to violations of the DMCA were committed solely by Bryan Reo and that the relevant federal court action was dismissed without prejudice and that furthermore Plaintiff's claims against Pastor Lindstedt and Lindstedt's Church has never been adjudicated on the merits because there were no merits to Plaintiff's case but currently the matter is in appeal before the 8th US Circuit so as to bring Bryan Reo and Reo co-conspirators to trial in the federal system and thus this Lake County Court of Common Pleas has no jurisdiction over matters dismissed regarding Reo's complaint and before the US 8th Circuit Court of Appeals regarding the counter-suit by Pastor Lindstedt and Lindstedt's Church against Bryan Reo and Reo's co-conspirator co-counter-defendants.

Response: Plaintiff admits that the previous action against Defendant Lindstedt in United States District Court in Missouri was indeed dismissed *without* prejudice for lack of subject matter jurisdiction. Plaintiff denies the remainder of the paragraph.

- 16) Admit that Pastor Lindstedt published largely true and thus unactionable statements about Plaintiff to third-parties via the medium of the World Wide Web while Plaintiff continued to publish claims that Pastor Lindstedt was a “convicted child molester” knowing that this was untrue and libel per se and that Plaintiff, in order to fraudulently sue in first federal court and now in this Ohio court has taken down these lies by Plaintiff.

Response: Deny as untrue. Further responding, Plaintiff has never stated that Defendant Lindstedt is a “convicted child molester” only that to Plaintiff’s knowledge and per the public record that Defendant was “on trial for child molestation” and ultimately spent approximately 3.5 years in a mental asylum in connection with that trial. Reasonable minds could easily conclude that Defendant is a child molester although Plaintiff has never stated that Defendant was convicted of those charges. Defendant’s obsession with scatological issues, fecal matter, urine [which Defendant claims to store in mason jars in a closet in Defendant’s house], and his frequent remarks about “regime criminal police having the testicles of their children stuffed into their mouths” could easily lead reasonable minds to conclude that Defendant is a deviant pervert. Defendant’s frequent obscene and despicably vulgar remarks, combined with Defendant’s past institutionalization in connection with Defendant’s criminal trial for statutory sodomy on a minor could easily lead reasonable minds to conclude that Defendant is probably a child molester.

- 17) Admit that Defendant’s largely and correct statements about Plaintiff were made by Pastor Lindstedt without the privilege accorded narcissistic predators working as Social Justice Warriors against genuine Christian Identity churches and pastors.

Response: Deny as untrue. Further responding, the paragraph is so poorly worded and incoherent that it is unclear what Defendant is asking.

- 18) Admit that Plaintiff acted with at least negligence, when not malice, in making false and defamatory statements about Defendant.

Response: Deny as untrue.

- 19) Admit that Bryan Reo has, in maliciously and fraudulently taking down a dozen web pages owned by Pastor Lindstedt's Church, now cannot claim that he has been harmed by inaccuracies in publication of what is known about Plaintiff. Indeed, the only thing now actionable before this Lake County Court is published public federal court documents.

Response: Deny as untrue. Further responding, Plaintiff has never taken down a single one of Defendant's websites, let alone maliciously and fraudulently. Every single one of Defendant's websites allegedly "taken down" was taken down by his own website host service provider for numerous and massive Terms of Services violations. Defendant appears unable or unwilling to conform to and abide by the rules and regulations of website hosting businesses. Defendant has only himself to blame for his website woes.

- 20) Admit that because of Bryan Reo's frivolous litigation, that what is discovered and then published about Plaintiff reflect upon the bad character of Plaintiff and bring him into ridicule, hatred, or contempt, and affects Plaintiff injuriously in his future trade or profession. No one wants to hire as a policeman a self-loathing mongrel as likely to murder a white man as a female negro and people do tend to wonder what exactly got Bryan Reo fired and banned as an intern at the local nuclear power plant.

Response: Deny as untrue. Further responding, Plaintiff is unable to provide a response because this Request for Admission is so incoherent and incomprehensible it is not clear what is being asked.

- 21) Admit that Plaintiff committed against Defendant the common law tort of libel *per se* for publishing numerous times that Pastor Lindstedt is a "convicted child molester" and the criminal action in taking those libels down from Reo's blogs and podcasts in order to file these fraudulent and perjurious fraudulent litigation in both the federal and Ohio courts.

Response: Deny as untrue. Further responding, Plaintiff has never declared Defendant Martin Lindstedt to be a “convicted child molester” although reasonable minds could easily conclude he is a child molester and should have been convicted instead of being given a bargain deal to go a mental asylum for treatment instead.

22) Admit that Plaintiff and Plaintiff’s co-conspirator counter-defendants made false and derogatory statements about Plaintiff that they publicized via the medium of the World Wide Web and that they continue to do so..

Response: Deny as untrue.

23) Admit that the true and correct statements made by Pastor Lindstedt about Plaintiff placed Plaintiff before the public in an altogether correct and true light which they have a right to know about.

Response: Deny as untrue.

24) Admit that the true and correct statements with documented proof made by Pastor Lindstedt about Plaintiff are highly offensive to a reasonable person to where if they are smart they won’t want anything to do with Bryan Reo or Reo’s friends if they are smart.

Response: Deny as untrue.

25) Admit that Bryan Reo is at fault for Reo’s criminal and vicious conduct and know that further litigation in this matter will only mean further publication of what will become public documents and probable prison time for Bryan Reo and Reo’s co-conspirators.

Response: Deny as untrue.

26) Admit that as a direct and proximate result of Pastor Lindstedt’s true statements about Plaintiff, Plaintiff has been and will continue to suffer damages in the form of mental anguish and reputational injury to where Plaintiff will likely “go postal” as promised in a roughly 3 minute and 16-second recorded Skype conversation secretly recorded by

Howard “Buck” McHugh. To ascertain these supposed damages, Bryan Reo wants to admit a mental evaluation to be paid for at the public expense so that Bryan Reo can be involuntarily civilly committed for life or until no longer a danger to himself or others.

Response: Deny as untrue. Further responding, Plaintiff notes that California requires all parties to a conversation to consent to the recording of the conversation and that any such recording would be illegal per California penal code 632(a) with severe criminal penalties. Massachusetts also requires both parties to a conversation to consent to a recording, with severe criminal penalties per Massachusetts General Law Title I, Chapter 272, Section 99. Mr. McHugh purports to live in Massachusetts and California, is Defendant declaring that he encouraged Mchugh to violate state recording laws?

27) Admit that Pastor Lindstedt committed against narcissistic predator and psychopath Plaintiff the tort of invasion of making it no longer possible for Bryan Reo to make anonymous terroristic and extortionary threats invading predatory privacy – false light.

Response: Deny as untrue.

28) Admit that Pastor Lindstedt publicly disclosed facts about Plaintiff which Plaintiff sure wishes would have remained private to third-parties via the the World Wide Web.

Response: Deny as untrue.

29) Admit that Pastor Lindstedt’s disclosure about “private” facts about anonymous predatory and criminal Plaintiff would be highly offensive and objectionable to a reasonable person of ordinary sensibilities to where Plaintiff would be known.

Response: Deny as untrue.

30) Admit that Pastor Lindstedt’s disclosure of “private facts” about no-longer anonymous cowardly Plaintiff has caused Plaintiff to have to try to behave himself because now everyone knows about Bryan Reo and Reo’s co-conspirator co-counter-defendants.