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

BRYAN ANTHONY REO,

Case No. 15CV001590

Plaintiff.

Hon. Richard L. Collins

v.

MARTIN LINDSTEDT,

Defendant.

BRYAN ANTHONY REO

7143 Rippling Brook Lane Mentor, OH 44060 (P): (440) 313-5893

(E) roodeplaat1983@gmail.com

Pro se Plaintiff

PASTOR MARTIN LINDSTEDT

338 Rabbit Track Road Granby, MO 64844 (P): (417) 472-6901

(E): pastorlindstedt@gmail.com

Pro se Defendant

<u>DEFENDANT PASTOR LINDSTEDT'S ANSWERS TO PROFESSIONAL PLAINTIFF</u> <u>PRO SE BRYAN REO'S FRAUDULENT FIRST SET OF "INTERROGATORIES"</u>

Professional Plaintiff pro se Bryan Anthony Reo, in search of an excuse to by fraud proceed to Summary Judgment on his behalf without having to face trial pretended to act pursuant to Rule 33 of the Ohio Rules of Civil Procedure and requested that Pastor Lindstedt respond to the following interrogatories. Then Bryan Reo made the following demands – none of which Reo ever intended to follow himself: You are required to answer these interrogatories separately and fully in writing, under oath. You are required to respond to these interrogatories no later than calendar (28) calendar days after receipt of these interrogatories. You are to respond FIRST while I use every excuse in the book to refuse to answer your "interrogatories" turned back on myself. I will refuse to accept your e-mails or Priority-mail packages. I will try to convince the judge that my fraud was legitimate. And please don't call me on my "interpretation" of the Ohio Rules of Civil Procedure. The facts do not support my bogus case.

"INSTRUCTIONS" a.k.a. "Reo Rules" that Reo won't obey

1- Each Interrogatory is to be answered fully on the basis of information which is in your possession.

Answer: Objection Bryan Reo with but three "interrogatories" sought to abuse the "admissions" process by making admissions substitute for true interrogatories, which are questions limited to forty in number. Bryan Reo "asked" 90 of these mongrelized weaponized discovery queries, most of them improper and libelous in any case.

This "interrogatory" of Bryan Reo was overbroad, sought to exceed the scope of any true interrogatory, and since Reo's fraudulent and vexatious lawsuit claims it is on what Pastor Lindstedt posted on his Church's web pages for everyone – including Bryan Reo to read – totally unnecessary except for purposes of harassment. Unlike Bryan Reo who posts that Pastor Lindstedt is a "convicted child molester" – a reprint of Eli James' / Joseph November lies on 1 Nov. 2010 reprinted on 5 Nov. 2010 on a blog provided by Bryan Reo coconspirator co-counter-defendant William Finck – Pastor Lindstedt <u>NEVER</u> practices fraud and deceit by taking down what was first posted – except through pressure brought to bear by Bryan Reo through a fraudulent Digital Millennium Copyright Act complaint.

When Bryan Reo drafted up this "interrogatory" the purpose was fraud. Pastor Lindstedt has always been more than happy to be forthcoming – and to post the answers, if known, on Lindstedt's Church's web page.

2- In each of your answers to these Interrogatories, you are requested to provide not only such information as is in your possession, but also information reasonably available. In the event that you are able to provide only part of the information called for by any particular Interrogatory, please provide all the information you are able to provide and state the reason for your inability to provide the remainder.

Answer-Objection: In drafting up this "interrogatory" Bryan Reo never intended to act upon what an "interrogatory" really meant, namely a question, but to treat these three fraudulent

"interrogatories" as a demand for an overbroad never-ending "fishing expedition" unlimited in scope in which Bryan Reo could file fraudulent and frivolous Motions to strike and for summary judgment without end. Bryan Reo is allegedly suing Pastor Lindstedt for what Lindstedt wrote about Reo – and others – on Lindstedt's Church's web pages that Reo wasn't able to fraudulently and maliciously take down through DMCA and Terms of Service complaints. In which case, the proper scope of "interrogatories" would be asking why or when or how something pertinent to Bryan Reo or Reo's fanciful damages, if any, was posted or printed, and not this open-ended request to speculate for something that Bryan Reo can make yet another fraudulent claim against the assets of Pastor Lindstedt or Pastor Lindstedt's Church.

3- If you object to or otherwise decline to answer any portion of an Interrogatory, please provide all information called for by that portion of the Interrogatory to which you do not object or to which you do not decline to answer. For those portions of an Interrogatory to which you object or to which you do decline to answer, state the reason for such objection or declination.

Answer-Objection: Was a question asked someplace above? A question usually has a question mark someplace at the end of it.

Bryan Reo drafted up these "interrogatories" with no purpose other than fraud and malice in mind in order to feed half-a-hundred motions to strike and for summary judgment and never for purposes of discovering the truth which would ill serve Bryan Reo malicious and vexatious litigation against Pastor Lindstedt and Lindstedt's Church, given that Reo couldn't prevail in front of the federal courts in the Northern District of Ohio or the Western District of Missouri.

INTERROGATORIES

1) For each and every request for admission for you did not provide an unequivocal admission in the affirmative, provide all facts and legal authorities that support your response.

Answer – Objection: Bryan Reo's 89 "Requests for Admission" were nothing more than Bryan Reo making demands that Pastor Lindstedt "admit" to Bryan Reo lies and delusions of both fact and law. Since this is supposedly a "libel & defamation" lawsuit the only things

necessary would be to ask Lindstedt why he published the material on Lindstedt's Church's web pages. The Answer would be because Pastor Lindstedt believed that what was published was substantially true and correct: That Bryan Reo is a public-figure Anti-Racist Activist who is a mongrel and very likely a homosexual (shown by both its demeanor and by its relentless blackmail to 'punk out" others) and along with Reo's jew and mongrel and homo co-conspirators has no place within White Nationalism and most certainly not within Christian Identity. Pastor Lindstedt's entire and sole purpose had been first to identify these Satanic elements and then remove them from the above-ground Body of Christ, i.e. genuine Aryan Christian Israel. Upon identifying and isolating Bryan Reo and the rest of the Reo jew and mongrel and homo co-conspirators, and making it impossible for them to accomplish anything by remaining as tares amongst the wheat, all that would be necessary is to keep posted what was sufficient to have run you off. Bryan Reo begged three times to leave – and broke its promises. There wouldn't have to be anything posted for the last year if Bryan Reo would simply stop with the frivolous litigation. Yet, this case proceeds once dismissed in the federal court because Reo wants to maliciously abuse legal process against Pastor Lindstedt and Lindstedt's Church in the Lake County Ohio Court.

2) Please list all documentary evidence in your possession that supports any and all of the facts in your proceeding answer to the previous interrogatory.

Answer-Objection: Again, this is not a question, just a fishing expedition by Bryan Reo. In any case, whenever information on Bryan Reo and Reo co-conspirators was found, almost always it was published on Church web pages, unless Reo made one of his many fraudulent DMCA complaints, in which it was hidden or taken down but never removed completely. Then, when Reo filed these malicious and fraudulent litigation attempts in the federal and not the Ohio courts, these items are hidden no longer. Looking at an inactive database, there were around 30-40 Bryan Reo posts, half of them empty placeholders for an e-mail concerning Bryan Reo and Reo co-conspirator criminality, before April 2014 and Reo's bogus federal lawsuit in Cleveland. Everything that Reo could or would claim was a "copyright infringement" was taken down and kept hidden. While Pastor Lindstedt would every so often make a "Bryan Reo" or "Broke-Back Mamzer" post and fill it out for Lindstedt's amusement, the CrisisHost.com owner Joshua Singer would demand that Lindstedt "stop pulling that dirty little mongrel-monkey's tail and making it

shit and then it comes running to me to make me bitch at you, " so "stop it". Pastor Lindstedt would admit that it was best to keep the Reo-bitching to a minimum and give it nothing useful to bitch about and would keep them posts locked down in the "admin-eyes only" subforums.

But now that there is never-ending Reo litigation those considerations no longer apply.

What Pastor Lindstedt wants from Bryan Reo are admissions to Bryan Reo and Reo coconspirator criminal activity to violate the First Amendment Rights of Lindstedt and Lindstedt's Church and send Bryan Reo, Reo's father, William Finck, Eli James, William Shawn DeClue and other Reo co-conspirators to prison.

Hail Victory!!!

Pastor Martin Lindstedt, Church of Jesus Christ Christian/Aryan Nations of Missouri

338 Rabbit Track Road, Granby, Missouri 64844

(P): (417) 472-6901 (E): pastorlindstedt@gmail.com

Certificate of Service:

I, Pastor Martin Lindstedt, unlike Bryan Reo, who refuses to send out an e-mail as this Court suggested due to the five-day postage delay, do hereby certify that he posted this Answer to Reo's "Interrogatories" on Lindstedt's Church web forum as of 21 Jan, 2016 at below thread:

http://christian-identity.net/forum/showthread.php?1614

And additionally that an e-mail was sent on 21 January 2016 to roodeplaat1983@gmail.com

And also do hereby certify that a true and genuine copy of this motion/brief/filing has been dispatched by United States mail, postage prepaid on 21 Jan 2016 to the Professional Plaintiff at:

Bryan Reo (& Anthony D. Reo, Bryan Reo's Father/Co-conspirator) 7143 Rippling Brook Lane, Mentor Ohio 44060

Hail Victory!!!

Pastor Martin Lindstedt, Church of Jesus Christ Christian/Aryan Nations of Missouri