

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

BRYAN ANTHONY REO,)	
Plaintiff,)	
)	
vs.)	No. 15CV001590
)	RICHARD L. COLLINS JR
MARTIN LINDSTEDT,)	January 6, 2016
Defendant.)	.

DEFENDANTS' RESPONSE TO PLAINTIFF'S LATEST VEXATIOUS MOTION TO STRIKE DEFENDANT'S AMENDED ANSWER AND COUNTER-CLAIM AS ABUSE OF LEGAL PROCESS AND CONTINUING UNAUTHORIZED PRACTICE OF LAW

COMES NOW the current Defendant Pastor Martin Lindstedt along with Lindstedt's non-profit church corporation in good standing The Church of Jesus Christ Christian / Aryan Nations of Missouri (hereafter in person described as "Pastor Lindstedt" and the Church corporation referred to as "Pastor Lindstedt's Church") to timely file this Response to Professional Plaintiff in fraud Pro Se Bryan Reo's latest Motion to Strike this Court's Ordered Amended Answer and Counter-Claim against Plaintiff Bryan Reo as Pastor Lindstedt did according to the best of Lindstedt's non-professional but humble abilities in essentially re-drafting the Original Answer and Complaint but in posting in front of the paragraphs the relevant ORDERED by this Court on Dec 23, 2015 Admissions or Denials under Ohio Rule of Civil Procedure Rule 8(B) or the Counterclaim under Ohio Rule of Civil Procedure Rule 13. Unlike Plaintiff Bryan Reo who has filed over 35 other cases whole sole purpose is to defraud and extort parties and corporations outside Ohio by use of abuse of legal process, Pastor Lindstedt is not a licensed attorney nor does Pastor Lindstedt engage in a criminal conspiracy or agreement to protect other parties in criminal collusion to defraud or oppress like Bryan Reo, who was caught by this Court doing so and in Reo's latest vexatious Motion to Strike, whines about "clearly

innocent third parties” such as William Finck and Melissa Epperson and Anthony D. Reo, whom this Court had to warn – when it should have summarily sanctioned and imprisoned – Bryan Reo for provided unauthorized practice of law unto as part of their criminal conspiracy.

The fact of the matter is that Pastor Lindstedt and Lindstedt’s Church assets have a right to proceed to trial regardless of Pastor Lindstedt’s ability to draft up an Answer and Counter-Complaint and whether Bryan Reo thinks or claims otherwise. Likewise, all Bryan Reo co-conspirators must answer for their criminal conspiracies along with Bryan Reo to silence Pastor Lindstedt and Lindstedt’s Church, especially given that Bryan Reo admitted to this Court on Dec. 17th that Reo was drafting up fraudulent motions claiming that since William Finck and Melissa Epperson live much the same distance as Pastor Lindstedt from Lake County Ohio, that this Court lacked subject-matter jurisdiction according to the Ohio Supreme Court and 6th U.S. Circuit Court of Appeals. Whereupon, this local Court should have agreed with Bryan Reo and Reo’s wonderous lawyer-like criminal conspiratorial motions written for Finck and Epperson, and rather than cluck, cluck, cluck about Reo’s “unauthorized practice of law” to summarily dismiss this case and sanction with fines and prosecution Bryan Reo, instead of leaving this matter to be addressed to the relevant Ohio court authorities and rhe Ohio Attorney General.

This Court has been unprofessionally lax, unprofessional and negligent in allowing Bryan Reo to file thirty-six cases – all without merit and for purpose of defrauding those outside Lake County Ohio – in the time span of slightly over two years. This Court is destroying its own legitimacy in allowing Bryan Reo to make vexatious and frivolous motion after motion to deny them due process of law *or even a trial by jury on the merits.* Bryan Reo is asking this Court to “sanction” Pastor Lindstedt by denying Pastor Lindstedt a jury trial by asking for a “default judgment”. That this Court would entertain such a corrupt delusion so at variance with the U.S. and Ohio Constitutions is perhaps a sure sign that the federal judiciary needs to shut this Lake County Court of Common Pleas down until a less lax and negligent to their duties to outsiders can be emplaced in place of the current court in Lake County. As it is, a copy of this motion shall be sent to the Ohio Attorney General and U.S. Attorney’s Office for the Northern District of Ohio as to what exactly is going on in Lake County Ohio.

I. STATEMENT OF FACTS

Plaintiff Bryan Reo filed this lawsuit in the Lake County Court of Common Pleas on Sept. 18, 2015 – a bare eight days after the Sept. 10, 2015 dismissal of Reo’s fraudulent federal

lawsuit by U.S. Magistrate Matthew Whitworth. Right now this case is before the 8th Circuit Court of Appeals as *Reo v. Lindstedt*, 15-3756, of which Pastor Lindstedt will supply as an Exhibit #1 the Appellate Brief submitted and accepted, along with a Motion to Supplement with Stricken Document #24 of April 22, 2015 and Exhibit #1 in which Bryan Reo republished on Reo's blog on Reo co-conspirator William Finck's server an article by Reo co-conspirator Eli James / Joseph November entitled "Rabbi Lindstentch: Race-Traitor of Jew?" in which Bryan Reo with malice per se called Pastor Lindstedt a "convicted child molester" while knowing the facts to the contrary. A printed copy of Appellant Pastor Lindstedt's Appellate is enclosed at the end of this Motion, as Exhibit #2.

Bryan Reo wants to pretend that he has somehow been cyber-stalked and harassed by Pastor Lindstedt while engaged in a criminal conspiracy to violate Pastor Lindstedt's and Lindstedt's Church's First Amendment Rights to Freedom of Speech and Freedom of Religion. At the Dec. 17, 2015 Conference this Court discussed the then pending 8th Circuit Court case. This Court acted as if it was in collusion with Bryan Reo at the time and mentioned how Bryan Reo likely wouldn't be in trouble for Reo criminality. However, the Appellate Brief simply makes it clear that while Bryan Reo and Reo co-conspirators are criminals who won't obey any law, it is a question of whether the Digital Millennium Copyright Act (DMCA) is constitutional given that it should be expected that criminals engaged in conspiracy to violate the First Amendment would abuse the DMCA, and that the DMCA needs to have sufficient criminal and civil deterrants to prevent this abuse. What Bryan Reo has to say as a criminal conspirator such as the delusion aired before this Court that Reo is aggrieved because Lindstedt found out Reo's identity when Reo and Finck would prefer to discuss the murder of 86 year old women in wheelchairs by an anonymous Reo and thus Lindstedt violated Reo's right to "privacy" as a terroristic anonymous criminal.

In any case, Bryan Reo is complaining to this Court that Pastor Lindstedt continues to report on this case, not only upon Pastor Lindstedt's Church web page, but on podcasts and on youtube. Let's say, for the sake of argument, that Bryan Reo's allegations are true. This Court has knowingly allowed Bryan Reo the unauthorized practice of law on behalf of Bryan Reo's father, Anthony D. Reo and William Finck and Melissa Epperson. This Court rather weakly was "negotiating" with Bryan Reo as to whether Bryan Reo would be allowed to refuse Pastor Lindstedt asking questions at any potential deposition held in Newton County Missouri. Bryan Reo admitted that Reo knowingly refused to accept a Priority-Mail Discovery package based

upon Bryan Reo claiming that because the package was wet, that somehow Pastor Lindstedt was poisoning Reo, when this was ridiculous. This Court said that it would “remind” Pastor Lindstedt to answer Bryan Reo’s discovery processes, but for Reo to answer Lindstedt’s discovery – which was nothing more than turning around Reo’s motions aimed at Reo. Reo has since filed motion after motion for summary judgment because Pastor Lindstedt refuses to take Bryan Reo’s lies about either the law or the facts seriously. In fact, it wasn’t until Jan. 21, 2016 that Pastor Lindstedt received Bryan Reo’s discovery answers, and in these “answers” Bryan Reo refuses to answer based upon privilege and confidentiality and without being placed under oath. This Court, when reminded that Bryan Reo can literally the very next day can run up to the Lake County Court and file a motion to strike, claim that he mailed the spurious motion that very same day, and then hold the motion for a few days to a week later before mailing it, and thus deny Pastor Lindstedt a reply brief for all practical effect. This Court claimed that because of fax machines (not that Pastor Lindstedt wants Bryan Reo calling into Lindstedt’s Church home to arrange a fax) or because of e-mail, Pastor Lindstedt could have the latest frivolous or vexatious Motion for Reo within the next day. However, Bryan Reo almost never sends via e-mail his flurry of motions but rather prints up these motions and mails them without a postmark from the postal service. In fact, right this minute Bryan Reo is begging this Court to strike a verified affidavit from Lindstedt concerning Reo fraud in this Bryan Reo Motion to Strike. Bryan Reo hasn’t ever filed any verified affidavit or civil complaint whatsoever in this case. Nothing prevents Bryan Reo from telling lies on the fly, such as admitting that Reo had drafted up Motions to Dismiss for co-conspirators William Finck and Melissa Epperson, or had refused to accept Pastor Lindstedt’s discovery packet upon knowing what that discovery packet contained.

Does this Court, even though it has been lax in allowing Bryan Reo to lie to it and in giving Reo instructions as to how to proceed in discovery which Reo violates, and certainly gave Pastor Lindstedt the impression that it was “ovulating” whenever with Bryan Reo in the same room, does this Court really think that it is going to prevent a jury from seeing the “Rabbi Lindstench: Race-Traitor or Jew?” article?

http://pastorlindstedt.org/lindstedt/legal/SoredMamzer/2015/Apr15/22Apr15/24_Counter-claim_22Apr15.pdf

Or hearing Bryan Reo on William Finck’s Talkshow show of August 10, 2013 admit that Bryan Reo was involved in a criminal conspiracy with Eli James and others to file fraudulent DMCA takedown notices in order to violate Lindstedt’s and Church’s First Amendment?

http://pastorlindstedt.org/lindstedt/legal/SoredMamzer/2013/Aug13/Shills5_10Aug13_13428-13546.mp3

In fact, Pastor Lindstedt would like to see the “e-mail exchange” promised by Bryan Reo!

Or how about an e-mail from the elderly woman that Bryan Reo threatened to murder thanking Pastor Lindstedt for finding out the true identity of the anonymous mongrel criminal who terrorized her with impunity when Reo thought that his identity wasn’t known? Or a criminal threat from Bryan Reo and co-conspirator Matthew Ott threatening to drive from Cleveland to assault and knock out Pastor Lindstedt’s teeth before Lindstedt’s hovel in Granby?

Insofar as the facts of this case are concerned, Bryan Reo is a mixed-race Anti-Racist-Activist who pretended to be a White Supremacist and Christian Identity leader up until the time that Pastor Lindstedt found out Reo’s actual picture, past criminal history, and the embarrassing facts of Reo’s motley jew crew of criminals and agents provocateur. Whereupon Bryan Reo and Reo co-conspirators took down 10-12 of Lindstedt’s Church’s web pages, incurring tremendous potential criminal and civil penalties. Then for nearly three years, Pastor Lindstedt’s Church found a home on CrisisHost.com, a free speech hoster, who hosted Lindstedt’s Church’s web pages until Reo threatened a fraudulent lawsuit in Lake County. The current ISP of Lindstedt’s Church knows what the law is and doesn’t pay much attention to Reo’s threats. The federal court refused to give Bryan Reo a gag order and this local state court will be stripped from power if it tries to censor the Internet. So the end result is that all of this fraudulent Bryan Reo litigation will end up in Bryan Reo losing everything or winding up in prison or going postal. Nothing else.

II. LAW AND ARGUMENT

The facts and law are clear: Pastor Lindstedt has a right to defend himself and Lindstedt’s Church from Bryan Reo’s frivolous and fraudulent and vexatious lawsuit before this Lake County Court. It doesn’t matter whether or not Pastor Lindstedt invokes whatever Ohio Rules of Civil Procedure in a manner approved of by Bryan Reo or this infatuated Court which allows Bryan Reo to run wild with thirty-six vexatious lawsuits in slightly over two years. Pastor Lindstedt and Pastor Lindstedt’s Church has a right to a jury trial, regardless of the rationalizations of a homosexual mongrel criminal and this mongrel criminal’s criminal co-conspirators who were all annoyed about being outed after a spell of threatening to murder eighty or ninety year old Greek women who laughed at the notion of a Jersey City jew pig who murdered a Puerto-Rican sneak thief in the Jersey City jail being some sort of “Greek scholar.”

There is no “right to privacy” for anonymous cowardly criminals all annoyed at being found out for who they are, being named by name and located with a street address and called out for their crimes. Being viewed for good reason as being the next mass shooter means that you likely are not ever going to be hired as a policeman or as a nuclear power plant worker, as these public authorities simply cannot afford to take chances with public safety. The Ohio Constitution says that truth is an absolute defense to Bryan Reo’s claims of libel and defamation, and Bryan Reo simply cannot prove that given the facts and Bryan Reo’s past behavior and criminal that Pastor Lindstedt’s investigation and revelation of these facts are actionable and must be punished by special extra-legal proceedings contrary to law under color of law. Bryan Reo has always acted as if people in positions of authority, be they this Court in the form of Magistrate Roll, or in the form of a murderous ex-jailer who murdered a Puerto-Rican prisoner in the Jersey City jail and now pretending to be a “Greek Scholar” have a special improper and even homosexual relationship with Bryan Reo so that Bryan Reo will give Bryan Reo whatever Bryan Reo begs for if only Bryan Reo begs loud and long enough. However, the problem with this strategy by Bryan Reo is that the First Amendment allows Pastor Lindstedt to post onto Pastor Lindstedt’s Church web page Bryan Reo and Reo co-conspirator criminality and machinations as a public record and the more Bryan Reo publicly whines the more material is posted. The so-called “filling of the court record with . . . “. . .redundant . . . immaterial . . . impertinent (to whom?) . . . irrelevant . . . scandalous (again, to whom?” material. This Court is apparently not supposed to take notice of the fact that it is Professional Plaintiff Bryan Reo who is clogging this Court with Motions to Strike filed before it literally a mere day (Jan. 8) after Defendant files his Court-ORDERED Amended Answer and Counter-Claims on (Jan. 7) after e-mailing Bryan Reo a copy of such on the date of mailing (Jan. 6, 2016). There have been some motions such as the flurry of motions filed by Bryan Reo immediately after the Dec. 17, 2015 Scheduling Conference which Pastor Lindstedt has left unanswered. But it is Bryan Reo who is altogether responsible for these vexatious and frivolous and malicious abuse of legal process motions, some of whom Pastor Lindstedt thinks simply must be addressed and due to the overt bias and prejudice of this lax Court allowing Bryan Reo legal abuse posted to the Church Internet properties.

Bryan Reo is facing the exact same problems in this state court that Bryan Reo faced in the federal district courts in the Northern District of Ohio and Western District of Missouri of Pastor Lindstedt joinder under the Rules of Civil Procedure and Rules of Court Bryan Reo’s father and up to forty or so of Bryan Reo co-conspirators, many of whom are guaranteed to turn

on Bryan Reo and some of whom are demanding of Bryan Reo that he draft up legal paperwork for them as defense against Pastor Lindstedt's counter-claims. In the federal court, U.S. Magistrate Matt Whitworth, not wanting s circus and knowing that Bryan Reo didn't have a valid claim under the DMCA simply demanded of Bryan Reo that Reo allege real damages of over \$75,000 sufficient to overcome state citizen diversity jurisdiction. Even though given an additional month to do so, Bryan Reo was unable to plausibly even state a claim upon which relief could be granted and the federal case for mythical \$10.75 million was dismissed. Whereupon Bryan Reo refilled before this Lake County Court of Common Pleas an action claiming over \$25,000 in mythical damages for what Pastor Lindstedt allegedly wrote on Lindstedt's Church's web pages concerning Bryan Reo, regardless of whether it is substantially true or not and without any proof that these writings are untrue, and demanding that this Court issue an unconstitutional gag order and prior restraint upon Church web pages and summarily rule in favor of Bryan Reo on all of Reo's claims unsupported by proof or even affidavit without benefit of jury trial.

At the Dec. 17, 2015 Case Management conference Bryan Reo admitted to the unauthorized practice of law on behalf of Bryan Reo's father, and Bryan Reo's co-conspirators William Finck and Melissa Epperson. Bryan Reo even went so far as to draft up a pertinent Motion proving that this Court has no subject matter or personal jurisdiction over parties well outside the jurisdiction of this state court living over 800 miles away as these actions can be used – like practically every single one of Bryan Reo's lawsuits for purpose of harassment. However, there is a criminal element involved as well as the unauthorized practice of law in that Bryan Reo has essentially admitted to being in a criminal conspiracy with Bryan Reo's father Anthony D. Reo, with William Finck and Melissa Epperson to take down Pastor Lindstedt's Church's web pages which carries with it hundreds of thousands in civil penalties and decades of prison time. What this Court should find alarming for its own purposes of legitimacy is the casual manner in which Bryan Reo claims that this Court is involved with Bryan Reo to commit these criminal acts.

Lastly, Bryan Reo sent on January 11, 2016 an e-mail to Pastor Lindstedt making s criminal threat to further abuse legal process by filing further vexatious motions the purpose of which is to compel Pastor Lindstedt to make expensive and harassing personal appearances before this Court to answer to Bryan Reo's discovery fraud. Pastor Lindstedt, as in the federal case, has the position that he is more than willing to allow the general public as well as Bryan

Reo to see all the documentation given these fraudulent and vexatious with purpose to harm Bryan Reo litigation against Pastor Lindstedt and Lindstedt's Church and their Internet properties. What Bryan Reo proposes to do is to file motion after motion claiming that Pastor Lindstedt, who is being sued for libel, must somehow provide discovery according to Bryan Reo's demands of something which is already publicly available. There is nothing held by Pastor Lindstedt which is any secret to anyone, yet Bryan Reo threatens to use his constantly implied "special relationship" with this Court in general and Magistrate Roll in particular as a club against the interests of Pastor Lindstedt and Lindstedt's Church in this case. Exhibit #1.

This Court hinted at the Dec. 17, 2015 Case Management conference that Pastor Lindstedt file a Motion to Dismiss after filing the Court-ordered Amended Answer and Counter-Claim. Indeed, a mere day after this Ordered Answer and Counter-Claim is filed, Bryan Reo is filing yet another Motion to Strike the entire Ordered Amended Answer & Counter-Claim on nothing more than because Bryan Reo doesn't like it, and not any particular portion of this 38-page filing. It is admitted that Pastor Lindstedt doesn't have the experience of filing 36 cases in the period of little over two years that professional Plaintiff pro se Bryan Reo has, yet Pastor Lindstedt is resigned to having to have a jury trial on the merits and thus finishing off Bryan Reo in the Lake County Court. Bryan Reo has of yesterday provided his first round of discovery and while it isn't nearly as intensive as what Reo asked of Lindstedt, there is absolutely nothing new from what has been the past six years. And as this case proceeds parallel in the federal court system, this fraudulent state court proceeding by Bryan Reo can be used to imprison and fine Bryan Reo and Reo co-conspirators for millions of dollars as the extent of their criminality becomes known through discovery in this state case.

Hail Victory !!!



Pastor Martin Luther Dzerzhinsky Lindstedt, ArchBishop
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(Tel #) 417-472-6901
(E-mail address): pastorlindstedt@gmail.com
(E-mail address for Reo who has threatened to terminate above e-mail address):
johnrelnetney@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 Response to Reo's Fraudulent "Demands for Production of Documents" which Reo hypocritically never itself intended to honor" on Lindstedt's Church web forum as of 22 Jan, 2016 at below thread:

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

And additionally that an e-mail was sent on 22 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 22 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

William Finck
Melissa Epperson
653 W. 23 Street
Panama City, Florida 32405

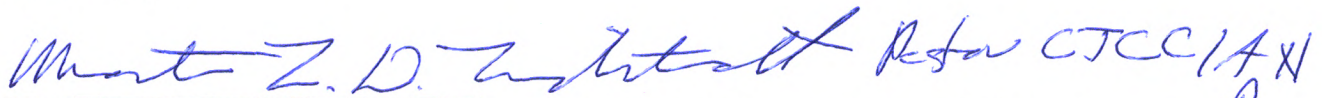
Enclosed is Exhibit #1. Pastor Lindstedt's Appellate Brief is not printed out for the above, but a link is provided for the Appellate Brief plus exhibits at:

<http://pastorlindstedt.org/lindstedt/legal/SoredMamzer/2015/8thCircuit/Jan16/Appellate%20Brief%2014Jan16.pdf> ← Appellate Brief

<http://pastorlindstedt.org/lindstedt/legal/SoredMamzer/2015/8thCircuit/Jan16/Motion%20to%20Supplement%20Record.pdf>

http://pastorlindstedt.org/lindstedt/legal/SoredMamzer/2015/Apr15/22Apr15/24_Counter-claim_22Apr15.pdf

Hail Victory!!!

 Pastor CTCC/AN

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