

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

BRYAN ANTHONY REO, ~~et. al.~~, )  
Plaintiff/~~Counter-Defendant(s)~~, )  
)

vs. )

No. 15CV001590  
RICHARD L. COLLINS JR

~~PASTOR MARTIN LINDSTEDT, CHURCH~~ )  
~~OF JESUS CHRIST CHRISTIAN/ARYAN~~ )  
~~NATIONS OF MISSOURI,~~ )  
Defendant(s)/~~Counter-Claimants.~~ )

*Section changed to conform with Magistrate Rolls Order of  
Dec. 23<sup>d</sup> 2015, received Dec. 28, 2015, Martin Lindstedt*

**DEFENDANTS/~~COUNTER-CLAIMANTS~~' AFFIDAVIT OF PLAINTIFF BRYAN  
REO'S KNOWING PERJURY AND ADMISSION TO THE UNAUTHORIZED  
PRACTICE OF LAW ON BEHALF OF WILLIAM FINCK AND MELISSA EPPERSON,  
REO CO-CONSPIRATOR CO-COUNTER-CLAIM DEFENDANTS**

COMES NOW the current Defendant(s)-Counter-Claimants Pastor Martin Lindstedt and 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 file this Verified Affidavit proving the following:

1. Pastor Martin Lindstedt is the Defendant in a fraudulent civil action instigated by Bryan Reo in the Lake County Ohio Court of Common Pleas. On Dec. 7, 2015, both William Finck and Melissa Epperson, against whom Pastor Lindstedt has a counter-claim as being Bryan Reo's co-conspirator co-counter-defendants in violating Lindstedt's and Lindstedt's Church's First Amendment rights to free honest speech and practice of religion, submitted largely identical Motions to Dismiss Defendant's Counter-Claim, as Magistrate Kenneth Rolls said at the Dec. 17, 2015 Case Management Conference in complimenting Bryan Reo's "ability to draft motions like a lawyer." Upon Pastor Lindstedt's accusing Bryan Reo of drafting these motions, Bryan Reo, caught out in fraud, claimed merely that Reo was in contact with Finck and Epperson, and that Finck asked to be kept "informed" by Bryan Reo. Magistrate Rolls told Bryan Reo that this was "unauthorized practice of law" and to "stop doing so immediately."



Bryan Reo claims that Pastor Lindstedt, 900 miles away, is under the jurisdiction of the Lake County Ohio Court, 900 miles away, yet William Finck and Melissa Epperson, living much the same distance away are “beyond the jurisdiction of this court” because it would create a hardship according to the 6<sup>th</sup> U.S. Circuit Court of Appeals and other Ohio Courts.

2. The entire Motions that Bryan Reo drafted for William Finck and Melissa Epperson, including the phrasing of the Certificate of Service, show that Bryan Reo drafted the entire Motions presented by William Finck and Melissa Epperson. In fact, Magistrate Roll complimented Bryan Reo on his legal draftsmanship while claiming that Pastor Lindstedt’s responses were “unreadable” and repeated Bryan Reo talking points. It wasn’t until Pastor Lindstedt pointed out that Bryan Reo wrote the Finck and Epperson Motions that Magistrate Rolls asked for an explanation and Bryan Reo lied, claiming that his part was limited to providing Finck and Epperson with copies of his filings in Lake County on this particular case.

3. It is not sufficient for Magistrate Roll to simply warn Bryan Reo to “stop it right now” in working in tandem with William Finck and Melissa Epperson on defeating Pastor Lindstedt and Lindstedt’s Church’s Counter-Claim. This is criminal conspiracy which should be punished by summary civil judgment against Bryan Reo, William Finck and Melissa Epperson and tried as a criminal action in the federal and/or state courts. This Court has, as officers of the Ohio State Court System, a legal and moral duty to immediately stay all further proceedings in this matter and to refer this matter to the police authorities, to the Ohio Attorney General’s Office , and the Ohio Supreme Court, particularly the Ohio Board on the Unauthorized Practice of Law.

4. Additionally, in Bryan Reo’s never-ending frivolous Motions to Strike and Briefs of Dec. 10, 2015, Bryan Reo certifies that he mailed off to myself, Pastor Lindstedt, these Motions and Exhibits. Yet the postage meter on the envelope (Exhibit #1) says that Bryan Reo mailed it to Pastor Lindstedt’s address on Dec. 11, 2015. Bryan Reo is deliberately making it difficult to impossible for Pastor Lindstedt to timely reply to Reo’s fraudulent and frivolous never-ending motions, which serve no purpose other than delay and added expense

5. The Motions that Pastor Lindstedt sent that were filed on Dec. 17, 2015 were file-stamped by the Clerk’s Office and sent back, via regular first-class mail, and delivered to Pastor Lindstedt on Dec. 21, 2015. Yet, the Motions that Bryan Reo filed asking for summary judgment on Dec. 15, 2015, and thus allegedly mailed to Pastor Lindstedt two days earlier than Dec. 17, 2015 didn’t arrive via first-class mail until Dec. 22, 2015. The most likely explanation is that



Bryan Reo didn't actually mail the Nov. 15, 2015 filing until Dec. 18, 2015 upon seeing how the Dec. 17, 2015 Case Management meeting would turn out. There is no postage meter on this mailing like the Dec. 11 2015 mailing, though, but if it had been mailed out on Dec. 15, 2015, why is it that arrived a day *after* something which couldn't have possibly been mailed by the Lake County Court Clerk before Dec. 17, 2015? Dec. 22, 2015 is one full week after Dec. 15, 2015. This leaves little time for Pastor Lindstedt to timely reply to Bryan Reo's flurry of fraudulent and frivolous motions and necessary to spend from \$5.75 for priority mail for three-day service and \$19.99 for Express Mail for next-day service.

6. Bryan Reo is obviously using the fact that by filing a motion, then mailing it out from one to three days later that it will be literally impossible for Pastor Lindstedt to file a Reply brief within five days and expensive to file an Answer within fourteen days.

7. Bryan Reo fraudulently claimed, in his Dec. 15, 2015 Motion and exhibits, that he couldn't somehow read the commonplace Word97-2003 ".doc" format used by Pastor Lindstedt in his Word2007, 2010, or 2013 computer program – which is a lie. Every Word For Windows program has been able to read past versions of their program – as does WordPerfect and Sun Office. Then because Pastor Lindstedt mailed off his first round of discovery requests which were simply turned-around Reo demands, Bryan Reo deliberately refused to accept the mailing of the paper copies because they were "wet". The package wasn't wet when it was mailed via next-day Express Mail. Magistrate Rolls chided Bryan Reo for making this fraudulent claim at the Case Management of Dec. 17, 2015. Rolls rather should have summarily dismissed the case because Bryan Reo was obviously lying to Rolls, and imposed real sanctions for the fraud.

8. Over the past five years of having to deal with Bryan Reo that the best policy is simply to let Bryan Reo lie and to put the pressure on Reo's co-conspirators. Then Bryan Reo has the choice of either letting them swing in the wind facing ruin, or like in this case, draft "legal" pleadings for them like has just been done for William Finck and Melissa Epperson. What worked for the federal case was to joinder Reo's co-conspirators and let Bryan Reo lie to the federal judge in Reo's endless fraudulent and frivolous motions. Then to in a reply motion to counter-punch with the truth. The benefit of having the case in the Western District of Missouri was that Bryan Reo was five to seven days away, while Pastor Lindstedt had next-day mail service for priority mail. The federal judge didn't want to deal with forty Reo co-conspirator co-counter-defendants and all of Reo's idiotic and fraudulent motions so U.S. Magistrate Judge



Matthew J. Whitworth decided to flush the case. Bryan Reo asked for, and got, an additional month to figure out how to show that Reo had a case – and Reo couldn't. Reo asked for the case to be moved to the Lake County Court of Common Pleas. This case is no different because already Bryan Reo is drafting Motions for Reo's co-conspirator co-counter-defendants William Finck and Melissa Epperson and leaving Clifton Emahiser, John Britton, William DeClue twisting in the wind, preventing his father, Anthony D. Reo from being served, as well as "Eli James" /Joseph November, whom Reo admits conspired to take down Lindstedt's Church's web pages. Bryan Reo fraud and criminality does not change either at the federal or Ohio court level.

9. Bryan Reo and Reo's sundry co-conspirator co-counter-defendants knowingly keep on falsely insisting that Pastor Lindstedt is a "convicted child molester" while complaining that Pastor Lindstedt calls them jews, mongrels, homosexuals and criminals. Bryan Reo keeps on taking down the evidence of his part in initiating this years-long conflict and whines when Pastor Lindstedt re-posts it on the Internet. Pastor Lindstedt has been upfront concerning Bryan Reo and Reo's co-conspirator defendants' criminal conduct and in telling the truth as Lindstedt sees it.

10. This Affidavit shall be disseminated far and wide to relevant parties. This Court has a duty to obey the law upon being given this verified Notice and Affidavit.

Hail Victory !!!

Martin Lindstedt Pastor CTCCLANP

Pastor Martin Luther Dzerzhinsky Lindstedt, ArchBishop  
The Church of Jesus Christ Christian / Aryan Nations of Missouri  
338 Rabbit Track Road, Granby Missouri 64844 (Tel #) 417-472-6901

**VERIFICATION**

STATE OF MISSOURI                   )  
COUNTY OF NEWTON               )

The undersigned, being duly sworn, on oath this 24 Day of December 2015 states that his Affidavit is true to the best of his knowledge and belief.

Martin Lindstedt Pastor  
Pastor Martin Lindstedt

Earl D. Reynolds  
Notary Public  
EARL D. REYNOLDS  
My Commission Expires  
August 23, 2017  
Newton County  
Commission #13464749  
NOTARY PUBLIC  
SEAL  
STATE OF MISSOURI

My commission expires: August 23, 2017