

Rolls at the Dec. 17<sup>th</sup> Case Management. Since Pastor Lindstedt's Church cannot afford an attorney to defend against Bryan Reo's vexatious and fraudulent litigation, and the Lake County Ohio taxpayers shouldn't have to provide for an attorney to protect Pastor Lindstedt's and Lindstedt's Church Constitutional rights under the U.S. and Ohio Constitutions, the end result is that with all of Pastor Lindstedt's imperfections in following the Ohio Rules of Civil Procedure, justice and "due process" mandates that this Court will have to make allowances for Pastor Lindstedt's imperfections in responding to Professional-ish Plaintiff pro-se Bryan Reo's fraudulent and vexatious unauthorized practice of law for the dozens and hundreds of anticipated flurry of motions to be expected from Bryan Reo seeking summary judgment by any means necessary. Pastor Lindstedt **wants** this case to go to jury trial and thus ending the criminal career of Bryan Reo, Bryan Reo's father, William Finck, Melissa Epperson, Eli James / Joseph November and about 20-40 Bryan Reo co-conspirators if by nothing else the posting to the Internet of the never-ending proceedings. What is most likely is that with over 20 or 30 separate parties from various parts around the country and in Canada and Australia, this Court will bail from this frivolous and vexatious litigation just as the federal courts in the Northern District of Ohio and Western District of Missouri did. After all, Bryan Reo has already written a Motion asking for dismissal of Pastor Lindstedt's Counter-Claim on behalf of William Finck and Melissa Epperson on the basis that this Lake County Court exists solely to destroy the Ohio and United States Constitutional paper guarantees of freedom of speech and religion through tamely giving Bryan Reo everything he wants in the form of getting to practice law without a license and having one law for his enemies like Pastor Martin Lindstedt and Lindstedt's pre-millennialist Dual-Seedline Christian Identity Church and another for William Finck and Melissa Epperson and their "No Devil" papist-preterist synagogue.

## I. INTRODUCTION

Plaintiff Bryan Reo's fraudulent claim before this Lake County Ohio Court of "tortuous conduct related to Defendant's campaign of 'cyber harassment' against Plaintiff via the World Wide Web" is fraudulent in that Plaintiff Bryan Reo routinely threatened to murder, rape and assault both Pastor Lindstedt and others when Bryan Reo had benefit of Internet anonymity, and then when Bryan Reo was identified, with public social media profiles and Reo's past history, Bryan Reo and Reo co-conspirators immediately violated the Digital Millennium Copyright Act (hereafter the DMCA) 17 U.S.C. § 512 by taking down a dozen of Pastor Lindstedt's Church



web pages, and those of other parties, committed criminal conspiracies violating 18 U.S.C. § 241 and 242 and violated Pastor Lindstedt and Lindstedt's civil rights to freedom of speech and religion under color of law, thus civilly liable in the federal jurisdiction under 42 U.S.C. § 1983 and 1984. Upon having his meritless federal case dismissed for failure to state a valid claim despite being given over a month to do so, Bryan Reo decided to file this vexatious and frivolous litigation before this local court. A petty criminal conspirator cannot and will not be able to censor the World Wide Web upon frivolous litigation before a local county court in Ohio.

## II. PARTIES

**2.A. Plaintiff Bryan Reo**, who resides with his father, Anthony D. Reo at 7143 Rippling Brook Lane, Mentor Ohio 44060.

**Admitted: (Civ.R.8B)**

**Denied: (Civ. R. 8B)** Contrary to Bryan Reo's assertion that he is a private – not a public – figure, in point of fact Bryan Reo used to have a blog claiming that he was running for an Ohio state assembly seat. But more to the point, Bryan Reo is a notorious Anti-Racist Activist with a public past under a White Nationalist Movement leader named Richard Barrett from 2000-2005 until Richard Barrett declared Reo wasn't white and that Reo would have to get used to it. Then around 2009, Bryan Reo resurfaced with "Pastor" Eli James to bring in William Raymond Finck as "Dual-Seedline" Christian Identity pastors and claimed to be a pastor and prominent White Nationalist racial activist of sorts himself. Bryan Reo took made fraudulent DMCA complaints and took down around a dozen of Pastor Lindstedt's Church's web pages, along with those of others as well. Reo maintains a blog at <http://bryanreo.blogspot.com/> and another one on William Finck's Christogenea web page as well: <http://sb.christogenea.org/blog/> where Reo used to reprint Eli James' claim that Pastor "Lindstedt was a convicted child molester" before taking that *libel per se* down in order to file his bogus litigation in federal court. Furthermore there was a Bryan Reo Talkshoe podcast channel in which Bryan Reo would claim that Pastor Lindstedt was a convicted child molester and brag – along with Reo's co-conspirators – about taking down Pastor Lindstedt and Lindstedt's Church's forums, blogs, web pages under color of the DMCA and where the DMCA didn't apply, in Montreal Canada. (By the way, recently Bryan Reo and William Finck took down the Bryan Reo blog in its entirety.

Bryan Reo also used to display a public Talkshoe podcasting channel at:

<http://www.talkshoe.com/talkshoe/web/talkCast.jsp?masterId=31407&cmd=tc>



Bryan Reo was formerly known as “SwordBrethren” and claimed to be a Teutonic Knight on StormFront and other forums. This Talkshoe Channel is currently “disabled” but can always be re-enabled by Bryan Reo and there are many shows in which Bryan Reo call Pastor Lindstedt a “child molester” and “pedophile” among other malicious things.

In short, contrary to Bryan Reo’s claims, within White Nationalism in general and Christian Identity in particular, Bryan Reo is a well-known, infamous even, limited purpose public figure . Hence the standard in a libel and defamation lawsuit is *Hustler Magazine, Inc., v. Falwell*, 485 U.S. 46, (1988) and *New York Times v. Sullivan*, 376 U.S. 254. All Pastor Lindstedt has done is to point out that Bryan Reo’s public Facebook profile picture, along with other social media pages such as Xuqa.com in which Bryan Reo showed his face, proves that Bryan Reo isn’t even remotely white, hence not a real Christian Identity or White Nationalist leader. The rest of Bryan Reo’s complaint concerns how Lindstedt has allegedly published public records concerning Reo from the federal district court case and soon this case as well.

Secondly, in the federal lawsuit, Pastor Lindstedt revealed that Bryan Reo was conspiring with William Finck and others on Finck’s Christogenea forum that Reo was engaging in litigation in order to steal by deceit all of Lindstedt’s “wealth, property, money” because Lindstedt was “the wicked one on Missouri” who was the “enemy of CI”. (Original Answer & Counter-Claim of Oct. 26, 2015, Exhibit #3 Document 9-1, 49-2 of the ongoing federal lawsuit). Thus Reo was conspiring with William Finck and Mark Downey and others to use the courts to defraud and oppress Pastor Lindstedt and Lindstedt’s Church.

**Counter-claim, (Civ. R.13):** Bryan Reo is a public figure within the White Nationalist and Dual-Seedline Christian Identity community who maliciously committed *libel per se* by publicly stating on his and other Reo co-conspirators’ web pages, blogs, forums, web pages that Pastor Lindstedt was a “convicted child molester” and pedophile. Pastor Lindstedt responded in like manner calling Bryan Reo an Anti-Racist Activist “mongrel homosexual” which, given Bryan Reo’s appearance and public social media profile pictures confirm the mixed-race ancestry of Bryan Reo. While Pastor Lindstedt and others cannot definitely prove that Bryan Reo is a homosexual, the effeminate mannerisms and the social media profiles certainly lead Pastor Lindstedt and others to assume as much. Therefore, maliciously calling Pastor Lindstedt a “convicted child molester and pedophile” while knowing this is false is far more of a slanderous offense than Pastor Lindstedt is calling Bryan Reo a “homosexual mongrel.” When someone is calling others names, they have no real claim to litigation when others call names right back.



This Court, in its Dec. 23, 2015 Order – received Dec. 28, 2015 – told Pastor Lindstedt to make admissions and denials under Civ.R.8(B) or (C) and Counter-Claims under Civ.R.13 and Pastor Lindstedt, no lawyer, or much less pretending to be an attorney practicing “law” for co-conspirators like Bryan Reo, is attempting to obey this Court’s Order as best he can.

**2.B. Anthony D. Reo, father of Bryan Reo**, living at 7143 Rippling Brook Lane, Mentor, Ohio, 44060.

**Counter-Claim Civ.R.13.** Anthony D. Reo is a counter-defendant in the federal lawsuit and Pastor Lindstedt seeks a default judgment because of Bryan Reo’s and Anthony D. Reo’s refusal to Answer to Pastor Lindstedt’s counter-suit in federal court in this May 8, 2015 harassing call to Lindstedt’s home:

<http://pastorlindstedt.org/lindstedt/legal/SoredMamzer/2015/May15/050815-133622.mp3>

Bryan Reo has claimed that his father, Anthony D. Reo, is one with Bryan Reo’s antics.

**Bryan Reo Unauthorized Practice of Law:** At the Dec. 17 Case Management Conference, Bryan Reo gloated that “We stopped Lindstedt’s service” presumably by refusal to sign for the certified letter containing the Lake County Ohio court clerk’s Summons along with Pastor Lindstedt’s Original Answer and Counter-Claim of Oct. 26, 2015 . This Court has itself warned Bryan Reo to “*not advocate on behalf of a third party, as he did on behalf of his father, as such would constitute the unauthorized practice of law.*” Cf. Order, Dec. 23, 2015, Paragraph 2, Section VI. However, rather than “caution” semi-professional Plaintiff pro se Bryan Reo for the unauthorized practice of law, this Court, as an Officer of the Judicial System of the State of Ohio, should have immediately dismissed this case against Pastor Lindstedt, and imposed a contempt sanction against Bryan Reo, and immediately reported Bryan Reo to the State Board on the Unauthorized Practice of Law and the Local Bar Association for this crime. The usual fine for this criminal activity is \$25,000, hence Pastor Lindstedt immediately makes a claim of \$25,000 to be assessed against Bryan Reo and an additional \$25,000 to be assessed against Anthony D. Reo. Pastor Lindstedt shall also notify the proper authorities on this matter. This in addition to the claim due on this counter-suit/counter-claim of \$25,000 on the merits.

**2.C.(a). William Raymond Finck, Jr.**, owner/operator of Christogenea.org and numerous other web sites, including [www.martinlindstedt.com](http://www.martinlindstedt.com), address 653 W. 23<sup>rd</sup> Street, Box 129, Panama City, Florida 32405.

**2.C.(b) Melissa Epperson**, concubine / paramour of William Finck, living with Finck, address 653 W. 23<sup>rd</sup> Street, Box 129, Panama City, Florida 32405.



**Counter-Claim Civ.R.13.** Both William Finck and Melissa Epperson, admittedly in contact still with Bryan Reo, continually call Pastor Lindstedt a “child molester,” a pedophile, a “pecker-puffer”, a sexual predator, and commit libel *per se* against Pastor Martin Lindstedt until the past month or so when they were served with a summons before this case. William Finck is a Jew who murdered a Puerto Rican sneak-thief in the Jersey City, New Jersey city jail, then “fincked” out his co-murderer and got a reduced prison sentence of 15 years for federal civil rights violations. Finck used to work with Eli James / Joseph November until falling out with November in early 2011. Finck and Eli James and Bryan Reo conspired to fraudulently use the DMCA and Terms of Service complaints to take down “all of Lindstedt’s web pages.”

Jan. 7, 2011: Eli James with William Finck: “Lindstedt is mad because we (James & Reo) took down all of Lindstedt’s web pages”:

**[http://mamzers.org/useful/audio/EliJames/7Jan11/01\\_07\\_11-EJ-long.mp3](http://mamzers.org/useful/audio/EliJames/7Jan11/01_07_11-EJ-long.mp3)**

August 13, 2013, Bryan Reo and Bill Finck discuss a conspiracy to take down all of Lindstedt’s web sites using fraudulent DMCA complaints, 1:34:28 to 1:35:46 – 1 min 18 secs:

**[http://pastorlindstedt.org/lindstedt/legal/SoredMamzer/2013/Aug13/Shills5\\_10Aug13\\_13428-13546.mp3](http://pastorlindstedt.org/lindstedt/legal/SoredMamzer/2013/Aug13/Shills5_10Aug13_13428-13546.mp3)**

Bryan Reo was also given a blog on William Finck’s web page where on Nov. 5, 2010, Bryan Reo published the Nov. 1, 2010 article “Rabbi Lindstench – Race Traitor or Jew?” <http://www.anglo-saxonisrael.com/content/rabbi-lindstench> Bryan Reo seems to have taken down not only his reprint of Eli James’ libelous *per se* article, but sometime within the past few months the entire blog given him by William Finck.

Therefore, William Finck and Melissa Epperson are accused of defamation, libel and slander and given a counter-claim by Pastor Lindstedt of \$25,000 each.

**Bryan Reo’s Unauthorized Practice of Law.** Furthermore, at the Case Management Conference of Dec. 17, 2015, while Magistrate Roll was castigating Pastor Lindstedt’s “unreadable” Original Answer and Counter-Claim of Oct. 26, 2015 and praising Bryan Reo’s attendance at law classes, and how Bryan Reo “wrote like an attorney” Pastor Lindstedt commented on how much William Finck’s and Melissa Epperson’s were so much alike. Magistrate Roll commented on how they were so expertly drafted and were word for word the same. Pastor Lindstedt commented that they should be – Bryan Reo had drafted up both Motions to Dismiss for William Finck and Melissa Epperson. Bryan Reo, caught, hastened to say that William Finck asked to see Bryan Reo’s litigation in the federal and Ohio courts. Magistrate Roll



then caught onto what was happening and said that Bryan Reo was engaging in the unauthorized practice of law and to “stop it.”

Again, this Court has itself warned Bryan Reo to “*not advocate on behalf of a third party, as he did on behalf of his father, as such would constitute the unauthorized practice of law.*” Cf. Order, Dec. 23, 2015, Paragraph 2, Section VI. However, rather than “caution” semi-professional Plaintiff pro se Bryan Reo for the unauthorized practice of law, this Court, as an Officer of the Judicial System of the State of Ohio, should have immediately dismissed this case against Pastor Lindstedt, and imposed a contempt sanction against Bryan Reo, and immediately reported Bryan Reo to the State Board on the Unauthorized Practice of Law and the Local Bar Association for this crime. The usual fine for this criminal activity is \$25,000, hence Pastor Lindstedt immediately makes a claim of twice \$25,000 – or \$50,000 for drafting up the Finck and Epperson Motions -- to be assessed against Bryan Reo and an additional \$25,000 each to be assessed against both William Finck and Melissa Epperson. Pastor Lindstedt shall also notify the proper authorities on this matter. This in addition to the claim due on this counter-suit/counter-claim of \$25,000 on the merits.

**2.D. “Pastor” Eli James, alias Joseph November, Joseph Kutz or Joseph Putz, etc. etc.**

Address of “Pastor Eli James” (Corporate name since 2005) or Joseph November, (legal name since 1981) at 4901 West Oakdale Avenue, Chicago, Illinois 60641.

**Counter-Claim Civ.R.13** Upon Pastor Lindstedt’s discovery that the anonymous Internet stalker calling itself “SwordBrethren” / SwordMamzer was in fact a well-known within the Movement semi-public figure with a past known as Bryan Reo, and the discovery of a Facebook public profile picture showing that Bryan Reo was obviously of not pure Aryan Israelite racial descent, Eli James and Greg Howard “ex-communicated” Pastor Lindstedt from what they claimed was their special Sanhedrin around noon on Oct. 31, 2010 for finding out about who SwordBrethren / SwordMamzer being Bryan Reo. That very Halloween night Eli James called into Pastor Lindstedt’s Talkshoe Show and called Pastor Lindstedt a pedophile and Federal agent and “White trash” and Lindstedt called Eli James a dirty jew and a ZOG agent provocateur / ZOGbot. The next day Eli James published a claim that Pastor Lindstedt was a federal agent provocateur but also that Pastor Lindstedt was a “convicted child molester” around nine or ten times, while knowing better. Bryan Reo reprinted that slander and defamation by Eli James on Reo’s Wordpress blog hosted on William Finck’s server starting on Nov. 5, 2010. This libel per



se was kept up until Reo decided to sue Lindstedt in federal court for libel and defamation. Eli James still has this libel *per se* article up, while Reo took his libel *per se* down while suing:

**<http://www.anglo-saxonisrael.com/content/rabbi-lindstench>**

From November 1, 2010 until around March 2011 Eli James, William Finck and Bryan Reo got along, with Eli James conspiring with Bryan Reo and William Finck and others to take down Lindstedt's Church's forums, blogs, web pages and Internet communications both political and religious. Pastor Lindstedt's Church is Orthodox Compartmental Dual-Seedline Christian Identity and both Eli James and Bill Finck are jews who practice "papist-preterism" (the belief that the Roman Catholic Church put Satan in the pit for a thousand years from 500-1500 AD where the Devil got out and whispered in Martin Luther's ear and started the Reformation) and "No Devil" in which Satan isn't real or if Satan is real Satan died in the pit and now the jews are Satan. Bryan Reo was annoyed with Eli James because Eli James said that up to 15% Edomite Canaanite jews like Eli James could get to heaven even though Bryan Reo isn't remotely pure Aryan Israelite or maybe only 30% white. However, by late February Pastor Lindstedt and Lindstedt's Church didn't have any public Internet presence that Bryan Reo and Eli James working together or separately could take detect/take down, although there were several secret underground private Internet Church servers to which Lindstedt's Church kept a very low profile. Pastor Lindstedt's Church even has secret servers located in India to preach the gospel.

"Eli James" is a made-up corporate name, as the name since 1982 was Joseph November. Reo and Finck found out about Eli James' family and have been defaming Eli James ever since. Eli James lives in Chicago, and probably will testify against Bryan Reo if subpoenaed. The address for Eli James / Joseph November is 4901 West Oakdale Avenue, Chicago, IL, 60641. Pastor Lindstedt makes a Reo-esque claim against "Eli James" for \$25,000.

## **2.E. "Pastor Mark Downey and Downey's jewess wife Deborah Badynsky-Downey.**

**Counter-Claim Civ.R.13** Another public figure in Christian Identity and White Nationalist Movement, Mark Downey was seen conspiring with Bryan Reo to initiate federal bogus litigation back in late August 2014, after Bryan Reo posted a thread on Finck's Forum called "Pray for my Success". (Original Answer & Counter-Claim of Oct. 26, 2015, Exhibit #3, Pray for My Success. *Not here reprinted.*)

Mark Downey and his "wife" Deborah Badynsky-Downey used to be pastor of this Washington State Klan in which Debbie was allowed to claim to be the "Klailiff" and Mark Downey, a known FBI informant, was allowed to be the Kludd, or Chaplain. In 2002 Pastor



Lindstedt found out that the “Klailiff” was also the sexual mascot of the Klan and so the Kludd ran off with the Klailiff and married her. The Downeys are also “Papist-Preterists” and “No-Devils” but since they can’t get along with most “No-Devils”, have their own congregation along with likeminded others. The Downeys claim that Pastor Lindstedt is a pedophile within the past year as well.

The Downeys are public figures within Christian Identity and have a web page:

**<http://kinsmanredeemer.com/>** and acts as a minister in Union Kentucky for Don Elmore’s Church: **<http://fgcp.org/>**

William Finck knows the street address of the Downeys and will be discovered to find it.

**2.F. Counter-Claims under Civ.R.13** Other parties to be joindered as conspiring with Bryan Reo and cyber stalking Lindstedt and all of whom Pastor Lindstedt makes a claim of damages:

**Bryan Reo’s Mother** – as Bryan Reo claimed in the dismissed federal case her as a witness on his behalf for his fraudulent claims. Bryan Reo knows her street address.

**Matthew Ott** – Bryan Reo’s henchman who threatened to cross state lines to molest Pastor Lindstedt in conjunction with Bryan Reo in Oct. 2010.

**“Victor Switzer”** – alias of a quarter-breed Choctaw Indian who is a fireman around Pine Bluff Arkansas, who conspired with Bryan Reo to take down Lindstedt’s and Lindstedt’s Church’s web pages until the second time Bryan Reo blackmailed him for homosexual favors.

**Greg Howard.** Unemployed and divorced henchman of Eli James and formerly Bryan Reo suspected of conspiracy in taking down Lindstedt’s and Lindstedt’s Church’s web pages.

**Dan Johns and Jeremiah Johns.** Another so-called Christian Identity minister and his son who worked with Bryan Reo to take down Lindstedt’s Church’s web pages.

**Jeromy John Visser.** Sephardic Cherokee Melungeon and so-called Christian Identity pastor who worked at one time with Bryan Reo to take down Lindstedt’s Church’s web pages and who still calls Pastor Lindstedt a pedophile. **[www.CovenantPeoplesMinistries.com](http://www.CovenantPeoplesMinistries.com)**

**Robert Hancock, aka “Obadiah 1:18” aka “Obie-gender-bender-pissers-poofter-possum666”** who used to work with Bryan Reo and William Shawn DeClue as well as Jeromy Visser to take down Lindstedt’s Church’s web pages and to interfere with John Britton’s federal civil lawsuit. Visser and Hancock, of Melbourne Australia who maintains a web site in the US, fell out with Visser in 2013. **<http://www.thechristianidentityforum.net/>**



**Mike Delaney.** Took down in conjunction with Bryan Reo the first web page, blog and forum under the [www.pastorlindstedt.org](http://www.pastorlindstedt.org) domain because Lindstedt reprinted an article insinuating that Mike Delaney was a federal agent provocateur. <http://www.prothink.org/>

**William Shawn DeClue** – a federal informant and unsuccessful burglar who worked with Bryan Reo to take down Church web pages and who calls Lindstedt a pedophile continuously. Pastor Lindstedt foolishly ordained DeClue upon DeClue's incessant begging and this lasted 2 days. DeClue had a lengthy criminal record which recently has been expunged. William DeClue has been served with a summons and if this case continues, Pastor Lindstedt will be entitled to a default judgment.

**Clifton Emahiser.** Pastor Lindstedt knows that Clifton Emahiser has been instrumental in bringing in William Finck into Christian Identity, and thus a conspirator with Reo and Finck. However, the actual damages are problematic. Clifton Emahiser has already been served with a summons and if this case continues, Pastor Lindstedt will be entitled to a default judgment.

**Martin 41, Allen Rouse, Meggie Butts, "Ezra Pound", "Sven Longshanks" and John or Jane Does #1-20.** Associates and co-conspirators of Bryan Reo, William Finck, Mark Downey who have joined them in taking down Pastor Lindstedt's and Lindstedt's Church's sundry web pages, forums, blogs and Internet teaching and preaching communications and/or keep on calling Pastor Lindstedt a pedophile. William Finck and Bryan Reo knows each of their true identities and street addresses.

**Howard "Buck" McHugh.** Former stock broker from A.G.Edwards, Buck McHugh operated a Skype chat room, and secretly hated Bryan Reo for working with a jew former partner to cost McHugh over a million dollars. In April 2013 Pastor Lindstedt "braced" McHugh for using Lindstedt as a catspaw against Reo by feeding Lindstedt information against Reo which was only correct 80% of the time. Reo claimed that Buck McHugh is under Reo's control, however. Reo would make agreements with both McHugh and John Britton to take down material and photos of Bryan Reo and then Reo would double-cross both McHugh and Britton. Buck McHugh played off Lindstedt and Reo against each other. Any case would have to involve subpoenaing, possibly suing, Buck McHugh.

**John Edward "Johnny Tonto" Britton.** Yet another "White Supremacist" and Christian Identist of mixed-race stock, Britton wanted Pastor Lindstedt to support a drunken crack-head named Morris Gulett, who went to prison for conspiring to rob banks in Alabama as Pastor Richard Butler's successor back in Jan. 2005. For approximately eight years Lindstedt helped