

There is agreement on the part of the Defense that a jury trial August 2, 2016 @ 8:30 am is in order.

However, Defendant observes that Bryan Reo has never really wanted a jury trial given all of Reo's fraudulent and vexatious Motions to strike and for Summary Judgment and refusal to participate in Discovery by accepting Defendant's own Discovery papers which are nothing more than Bryan Reo's own discovery devices turned about to ask of Bryan Reo what Reo asked of Pastor Lindstedt. Right now Pastor Lindstedt is working on filing his "admissions" while Bryan Reo plays games in accepting Pastor Lindstedt's discovery processes.

## **VI. CAUSES OF ACTION**

### **COUNT I – COMMON LAW DEFAMATION**

**18. Bryan Reo** -- *The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.*

**19. Bryan Reo** -- *Defendant published false and defamatory statements about Plaintiff to third-parties via the medium of the World Wide Web.*

**20. Bryan Reo** -- *Defendant's false and defamatory statements about Plaintiff were made by Defendant without privilege.*

**21. Bryan Reo** -- *Defendant acted with at least negligence in making false and defamatory statements about Plaintiff.*

**22. Bryan Reo** -- *Defendant failed to act reasonably in attempting to discover the truth or falsity or defamatory character of Defendant's publication about Plaintiff.*

**23. Bryan Reo** -- *Defendant's false and defamatory statements about Plaintiff are defamatory per se insofar as said statements reflect upon the character of Plaintiff by bringing him into ridicule, hatred, or contempt, and affects Plaintiff injuriously in his future trade or profession.*

**24. Bryan Reo** -- *Defendant committed against Plaintiff the common law tort of libel per se.*

**Civ. R. 8(B) Denial.** Insofar as Bryan Reo states a cause of action of all of above items, as opposed to merely stating what Bryan Reo wishes the law was against Pastor Lindstedt and Lindstedt's Church, Pastor Lindstedt denies all the above allegations.

**Civ.R.8(C) -- Affirmative Defenses.** Due to fraud, perjury, Statute of Limitations, Unauthorized Practice of Law, abuse of legal process, res judicata, lack of subject matter and personal jurisdiction, etc. Bryan Reo cannot sustain any of the claims made in Reo's boilerplate

Items #18-24 in Count I -- Defamation. Bryan Reo called Pastor Lindstedt a child molester and pedophile and Pastor Lindstedt has called Bryan Reo a mongrel homosexual. Internet name-calling cannot sustain a course of action.

**Civ.R. 13—Counter-claims.** Pastor Lindstedt and Lindstedt's Church ask that Bryan Reo and Bryan Reo's co-conspirators suffer the same penalties that they would assess or claim against the Defendants in this frivolous and vexatious litigation.

## **COUNT II – COMMON LAW INVASION OF PRIVACY – FALSE LIGHT**

**25. Bryan Reo --** *The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.*

**26. Bryan Reo --** *Defendant made false and derogatory statements about Plaintiff that Defendant publicized via the medium of the World Wide Web.*

**27. Bryan Reo --** *The false and derogatory statements made by Defendant about Plaintiff placed Plaintiff before the public in a false light.*

**28. Bryan Reo --** *The false and derogatory statements made by Defendant about Plaintiff are highly offensive to a reasonable person.*

**29. Bryan Reo --** *Defendant is at fault and knew or acted with recklessness as to the truth of the statements made by Defendant that concern Plaintiff.*

**30. Bryan Reo --** *As a direct and proximate result of Defendant's statements about Plaintiff, Plaintiff has been and will continue to suffer damages in the form of mental anguish and reputational injury.*

**31. Bryan Reo --** *Defendant committed against Plaintiff the tort of invasion of privacy - false light.*

**Civ. R. 8(B) Denial.** Insofar as Bryan Reo states a cause of action of all of above items, as opposed to merely stating what Bryan Reo wishes the law was selectively applied against Pastor Lindstedt and Lindstedt's Church, Pastor Lindstedt denies all the above allegations. Additionally, Bryan Reo has never respected the privacy of Defendants or of others.

**Civ.R.8(C) -- Affirmative Defenses.** Due to fraud, perjury, Statute of Limitations, Unauthorized Practice of Law, abuse of legal process, res judicata, lack of subject matter and personal jurisdiction, etc. Bryan Reo cannot sustain any of the claims made in Reo's boilerplate Items #25-31 of "False Light" which doesn't exist in Ohio Statute or Constitution.



**Civ.R. 13—Counter-claims.** Pastor Lindstedt and Lindstedt’s Church ask that Bryan Reo and Bryan Reo’s co-conspirators suffer the same penalties that they would assess against the Defendants in this frivolous and vexatious litigation. Bryan Reo and Reo’s co-conspirators keep on calling Pastor Lindstedt a “convicted child molester” and pedophile, negating this claim.

**COUNT III -- COMMON LAW INVASION OF PRIVACY**  
**PUBLIC DISCLOSURE OF PRIVATE FACTS**

**32. Bryan Reo --** *The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.*

**33. Bryan Reo --** *Defendant publicly disclosed private facts about Plaintiff to third-parties via the medium of the World Wide Web.*

**34. Bryan Reo --** *Defendant's disclosure about private facts about Plaintiff would be highly offensive and objectionable to a reasonable person of ordinary sensibilities.*

**35. Bryan Reo --** *Defendant's disclosure of private facts about Plaintiff was done intentionally.*

**36. Bryan Reo --** *Defendant's disclosure of private facts about Plaintiff are not of legitimate concern to the public.*

**37. Bryan Reo --** *Defendant committed against Plaintiff the tort of invasion of privacy - public disclosure of private facts.*

**Civ. R. 8(B) Denial.** Insofar as Bryan Reo states a cause of action of all of above items, as opposed to merely stating what Bryan Reo wishes the law was selectively enforced against Pastor Lindstedt and Lindstedt’s Church, Pastor Lindstedt denies all the above allegations. Additionally, Bryan Reo would publish the street address and telephone number of Pastor Lindstedt and others even before Pastor Lindstedt found out Reo’s real name and past history. Bryan Reo whining about violating the privacy of others is ridiculous and hypocritical.

**Civ.R.8(C) -- Affirmative Defenses.** Due to fraud, perjury, Statute of Limitations, Unauthorized Practice of Law, abuse of legal process, res judicata, lack of subject matter and personal jurisdiction, etc. Bryan Reo cannot sustain any of the claims made in Reo’s boilerplate Items #32-37 in “Count III.” There is no such tort as “public disclosure” of something which doesn’t exist such as “private facts” in Ohio Statute or the Ohio Constitution. Even if there was, then Bryan Reo and Reo’s co-conspirators would be guilty of libel *per se* in calling Pastor Lindstedt a “convicted child molester” and thus invading Pastor Lindstedt’s privacy.



**Civ.R. 13—Counter-claims.** Pastor Lindstedt and Lindstedt's Church ask that Bryan Reo and Bryan Reo's co-conspirators suffer the same penalties that they would assess against the Defendants in this frivolous and vexatious litigation.

**COUNT IV - COMMON LAW INVASION OF PRIVACY – INVASION OF SECLUSION**

**38. Bryan Reo** -- *The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.*

**39. Bryan Reo** -- *Defendant intentionally intruded upon Plaintiff's seclusion, solitude, and/or private concerns or affairs by making public disclosures of information about Plaintiff that are of no legitimate concern to the public.*

**40. Bryan Reo** -- *Plaintiff has a reasonable expectation of privacy in his solitude, seclusion, and/or private concerns or affairs.*

**41. Bryan Reo** -- *The unreasonable intrusions and invasions by Defendant occurred in a way that would be highly offensive to a reasonable person.*

**42. Bryan Reo** -- *As a direct and proximate result of Defendant's intrusions upon Plaintiff's seclusion or solitude, Plaintiff has suffered damages.*

**43. Bryan Reo** -- *Defendant committed against Plaintiff the tort of invasion of privacy - invasion of seclusion.*

**Civ. R. 8(B) Denial.** Insofar as Bryan Reo states a cause of action of all of above items, as opposed to merely stating what Bryan Reo wishes the law was selectively enforced against Pastor Lindstedt and Lindstedt's Church, Pastor Lindstedt denies all the above allegations.

**Civ.R.8(C) -- Affirmative Defenses.** Due to fraud, perjury, Statute of Limitations, Unauthorized Practice of Law, abuse of legal process, res judicata, lack of subject matter and personal jurisdiction, etc. Bryan Reo cannot sustain any of the claims made in Reo's boilerplate Items #38-43 in "Count IV." There is no such tort as "invasion of seclusion" of something which doesn't exist in Ohio Statute or the Ohio Constitution. Even if there was, then Bryan Reo and Reo's co-conspirators have been the ones invading Pastor Lindstedt's and Lindstedt's privacy and seclusion rights by their fraudulent and vexatious pursuit of Defendants and not the other way around.

**Civ.R. 13—Counter-claims.** Pastor Lindstedt and Lindstedt's Church ask that Bryan Reo and Bryan Reo's co-conspirators suffer the same penalties that they would assess against the Defendants in this frivolous and vexatious litigation. Additionally, Bryan Reo would publish the



street address and telephone number of Pastor Lindstedt and others even before Pastor Lindstedt found out Reo's real name and past history. Bryan Reo whining about violating the privacy of others is ridiculous and hypocritical.

#### **COUNT V – PUNATIVE DAMAGES**

**44. Bryan Reo --** *The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.*

**45. Bryan Reo --** *Defendant's conduct was conscious, deliberate, intentional, and/or reckless in nature.*

**46. Bryan Reo --** *Defendant's conduct was undertaken with hatred, ill will, and/or vexation.*

**47. Bryan Reo --** *Defendant's conduct was done with a conscious disregard for the rights of Plaintiff and has a great probability of causing Plaintiff substantial harm for many years.*

**48. Bryan Reo --** *Plaintiff is entitled to punitive damages from Defendant.*

**Civ. R. 8(B) Denial.** Insofar as Bryan Reo states a cause of action of all of above items, as opposed to merely stating what Bryan Reo wishes the law was selectively enforced against Pastor Lindstedt and Lindstedt's Church, Pastor Lindstedt denies all the above allegations. Bryan Reo cannot prove that there were any damages against Bryan Reo whatsoever, much less claim punitive damages – especially given that Reo has been stalking Pastor Lindstedt.

**Civ.R.8(C) -- Affirmative Defenses.** Due to fraud, perjury, Statute of Limitations, Unauthorized Practice of Law, abuse of legal process, res judicata, lack of subject matter and personal jurisdiction, etc. Bryan Reo cannot sustain any of the claims made in Reo's boilerplate Items #44-48 in "Count V –Punitive Damages." Plaintiff and Plaintiff's co-conspirator co-counter-defendants' have not only violated Ohio law, but 17 U.S.C. § 512(f) and 42 U.S.C. § 1983, 1985 as well. There are also criminal violations of federal law by Plaintiff and Plaintiff's co-conspirator co-counter-defendants as well. Therefore any claims before this local court absent subject matter and personal jurisdiction (And Bryan Reo has argued on behalf of William Finck and Melissa Epperson that this Court lacks personal jurisdiction against parties residing out of the Ohio state limits.) should be summarily dismissed.

**Civ.R. 13—Counter-claims.** Pastor Lindstedt and Lindstedt's Church ask that Bryan Reo and Bryan Reo's co-conspirators suffer the same penalties – especially punitive ones -- that they would assess against the Defendants in this frivolous and vexatious litigation.



## COUNT VI – PERMANENT INJUNCTION

**49. Bryan Reo** -- *The foregoing paragraphs of this Complaint are incorporated by reference as if fully set forth herein.*

**50. Bryan Reo** -- *Some or all of the improper and unlawful conduct of Defendant is continuing and will continue in the future absent injunctive relief from the Court, and Plaintiff will continued to be damaged by the same.*

**51. Bryan Reo** -- *In the absence of the entry of a permanent injunction by the Court, Plaintiff will suffer serious and irreparable harm and injury, including but not limited to damage to Plaintiffs reputation.*

**53. Bryan Reo** -- *Public policy favors the entry of a permanent injunction because such relief will prevent unlawful conduct and will preserve and protect Plaintiffs reputation from further injury.*

**54. Bryan Reo** -- *Plaintiff is entitled to a permanent injunction in which Defendant is compelled to remove from the World Wide Web and not republish thereto any and all derogatory materials Defendant or Defendant's agents published there about Plaintiff.*

**Civ. R. 8(B) Denial.** Insofar as Bryan Reo states a cause of action of all of above items, as opposed to merely stating what Bryan Reo wishes the law was selectively enforced against Pastor Lindstedt and Lindstedt's Church, Pastor Lindstedt denies all the above allegations. Bryan Reo cannot be given any injunction to take down Pastor Lindstedt's Church's web pages in any case, and proves malicious intent in so asking.

Additionally, this explains Bryan Reo's entire motives. Bryan Reo wants Pastor Lindstedt and Pastor Lindstedt's Church's critical public inquiry concerning Bryan Reo and Bryan Reo's friends silenced by this Lake County Court. This is a solicitation for the violation of the First Amendment of Freedom of Speech and Religion and a violation of the Ohio Constitution as well.

**Civ.R.8(C) -- Affirmative Defenses.** Due to fraud, perjury, Statute of Limitations, Unauthorized Practice of Law, abuse of legal process, res judicata, lack of subject matter and personal jurisdiction, etc. Bryan Reo cannot sustain any of the claims made in Reo's boilerplate Items #49-53 in "Count VI –Request for Permanent Injunction."

There can be no such preliminary or permanent "prior restraint" restraining order issued by this Ohio Court. *Near v. Minnesota*, 427 U.S. 539, 559. In 1931 it involved a racist, anti-jew anti-negro publisher named Near who was writing articles against jew and negro and mongrel criminals who used a Minnesota law to shut down Near's newspaper. After losing several times



before the Minnesota Supreme Court, the U.S. Supreme Court ruled that such “gag orders” were unconstitutional *per se*. This admission by Bryan Reo that Reo wants the complete violation of the U.S. and Ohio Constitutions regarding Freedom of Speech and Religion negates absolutely Bryan Reo’s entire case as it proves that a slander, libel, and defamation pretext is being used to justify the destruction of the religious and intellectual property of Pastor Lindstedt’s Church and the silencing under color of law of Pastor Lindstedt.

**Civ.R. 13—Counter-claims.** Pastor Lindstedt and Lindstedt’s Church ask that Bryan Reo and Bryan Reo’s co-conspirators suffer the same penalties – especially punitive ones -- that they would assess against the Defendants in this frivolous and vexatious litigation.

## **VII. PRAYER FOR RELIEF**

***FINALLY – BRYAN REO -- WHEREFORE, Plaintiff prays that this Court will enter judgment against Defendant in Plaintiff’s favor in an amount of money that exceeds twenty-five thousand dollars (\$25,000.00) for general and special damages, award Plaintiff punitive damages against Defendant in an amount the Court deems just and proper, award Plaintiff all costs associated with maintaining the instant civil action, award Plaintiff all pretrial and post-trial interest on any and all monetary relief awarded to Plaintiff, award Plaintiff injunctive relief by ordering Defendant to remove from the World Wide Web and not republish thereto derogatory or’ invasive materials about Plaintiff that Defendant or Defendant’s agents published about Plaintiff, and will award Plaintiff all other relief to which Plaintiff is entitled as a matter of law or equity.***

WHEREFORE, in this thorough and correct and true and genuine Amended Answer and Counter-Complaint to the best of their Humble Abilities Pastor Martin Lindstedt, and Pastor Lindstedt’s Church Corporation in good standing in the State of Missouri, The Church of Jesus Christ Christian / Aryan Nations of Missouri do to the best of their limited abilities submit this Court-ORDERED Amended Answer and Counter-Complaint.

Bryan Reo has demonstrated that he is a vexatious and frivolous litigator practicing the unauthorized practice of law. There are no merits whatsoever to this case and Bryan Reo should be punished and prosecuted and this case should be summarily dismissed with Defendants reimbursed for their costs and trouble.