

**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,)	MOTION FOR SUMMARY
Defendant.)	JUDGMENT

**DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AGAINST PLAINTIFF DUE
TO REO'S REFUSAL TO GO TO TRIAL ON PLAINTIFF'S FRAUDULENT CLAIMS**

COMES NOW the current Defendant / Counter-Claimant Pastor Martin Lindstedt (hereafter in person described as "Pastor Lindstedt") to make a Motion for Summary Judgment against Plaintiff Bryan Reo due to Bryan Reo's willful refusal to actually proceed to jury trial on this frivolous, fraudulent and malicious case before this Court which actually has neither subject-matter nor personal jurisdiction against Defendant Pastor Lindstedt, Lindstedt's domestic partner Roxie Fausnaught, nor Pastor Lindstedt's Church of Jesus Christ Christian / Aryan Nations of Missouri. This corrupt Lake County Court has allowed Bryan Reo to transgress and commit mail and wire fraud across a distance of 900 miles and several states away for three bogus cases, one involving a fraudulent and perjurous "civil stalking" claim in which Bryan Reo claimed that upon a non-Church web page in which in all likelihood Bryan Reo was the one posting the alleged death threats against himself.

This corrupt and idiotic Lake County Court has even started a racial and religious state of civil war by agreeing with Bryan Reo that Pastor Lindstedt cannot defend his Church nor his 420-lb semi-illiterate sixty-year-old domestic partner because neither can afford Ohio attorneys to defend them before this corrupt and lawless Court. According to Dual-Seedline Christian Identity (DSCI) doctrine, Pastor Lindstedt has an affirmative duty to petition the under-ground Saints to use crude biological weapons of civil and racial war which are likely to affect non-whites like Bryan Reo far more than whites, and to issue Letters of Marque & Reprisal which while much better targeted against the lawyers, judges, politicians, and police and anyone who

supports the Ohio regimes, likewise holds the People of Ohio responsible as were the citizens of Dresden and Hiroshima for the criminal activities of their civil masters. Do they have a learned DSCI pastor or scholar to make a case as to how they are not to be treated as the Citizens of Sodom & Gomorrah for the corruption of their courts, or the Tribe of Benjamin for covering for the Sons of Belial Gibeonite Amorite Canaanite jews when they raped the Levite's concubine? Jesus Christ said that the Men of Sodom whose doom was initiated by corrupt judicial proceedings against Abraham's servant Eliazar absent jurisdiction would judge the People of Lake County, of Ohio, and of America. Neither Abraham nor Moses nor any righteous man should try a lawyer's or baal-priest's tricks to deter justice raining down upon degenerate people.

This summary judgment would be only against Bryan Reo for the abuse of legal process for the amount of \$25,000 in order to deter and end Bryan Reo's four or five vexatious and frivolous litigation designed solely to harass and oppress with the aid of this Lake County Court of Common Pleas (as the Mentor Municipal Court disclaimed jurisdiction over an out-state citizen of another state 900 miles away and a Church Corporation incorporated in another state) regarding substantially true interstate and international communications via the Internet of which a small fraction of a percent concerns Bryan Reo. This Court has jurisdiction to punish Bryan Reo as a professional plaintiff *pro se* who is engaged in wire fraud against Pastor Lindstedt and Lindstedt's Church and Church Directors. However, neither this Lake County Court of Common Pleas, nor the Mentor Municipal Court as a division of this Lake County Ohio Court, has any real jurisdiction over what is said or written on the Internet outside certain limited parameters.

There are already a number of Bryan Reo co-counter-defendant co-conspirators outside this county and state, some for whom Bryan Reo drafted a Motion to Dismiss, namely William Finck and Melissa Epperson. This criminal conspiracy by Bryan Reo and others over fraudulently using the federal court and now this Ohio state county court to censor by deceit and fraud under color of law is a matter of federal, not state jurisdiction involving multi-state and international Bryan Reo criminal conspirators. Hence, this renewed Motion for Summary Judgment because of Bryan Reo's abuse of legal process to use this Ohio court to censor and violate Defendant's First Amendment rights and malicious prosecution in that Bryan Reo and Reo co-conspirators called Pastor Lindstedt a "convicted child molester" which is libel *per se*, while Pastor Lindstedt published a Bryan Reo Facebook public profile picture of Reo's 2004 Mentor High School graduation picture showing that this wannabe "White Supremacist" and wannabe Dual-Seedline Christian Identity pastor was an obvious effeminate mongrel. It is

doubtful that a jury in Lake County will find against Pastor Lindstedt and/or Lindstedt's Church at trial. Therefore, Bryan Reo has committed the tort of malicious prosecution as well, for which this Court should summarily punish Bryan Reo as the only party over whom this Court has jurisdiction by imposing a \$25,000 judgment in favor of Defendant(s) and let other matters proceed in the federal courts where elements of the prior Reo fraudulent litigation continues.

I. Statute of Limitations of Ohio Revised Code § 2305.03 and 2305.11 forbids this lawsuit

While Bryan Reo claims that because U.S. Magistrate Judge Matthew Whitworth dismissed Reo's litigation without prejudice, the fact that Reo failed at the federal level doesn't allow anything before Reo filed on April 15, 2014 in the Northern District of Ohio federal district court to suddenly become relevant because of that failure. Bryan Reo could have filed this action for alleged defamation happening in 2010, 2011, 2012, 2013 and before April 2014 in this Lake County Court, but rather since \$10.75 million is more than \$25,000 chose not to do so. U.S. Magistrate Judge Matthew Whitworth told Bryan Reo when Reo begged to bring his case down to Lake County Ohio to be mindful of Ohio Statute of Limitations, and while not knowing Ohio law, figured out that whining about what was allegedly said over five years ago wouldn't cut it. The federal system isn't some cryogenic freezer unit in which claims over a half decade are made, brought up, and then when failed, to be thawed out and processed like rotten chicken before a corrupt cash-register state court lacking jurisdiction over defendants unmindful of local rules somewhere when the state law sets limits for the cases to be processed locally

II. Other Parties Joindered as Bryan Reo Co-Counter-Defendants / Co-Conspirators

Seven other parties were counter-sued by Pastor Lindstedt in this case.

Eli James / Joseph November evaded service even though working in concert with Bryan Reo to libelously claim that Pastor Lindstedt was a "convicted child molester" – which claim Bryan Reo republished on a blog provided him by Reo co-conspirator William Finck and to take down three or four Church web pages under the Digital Millennium Copyright Act. (Henceforth DMCA.) Bryan Reo admitted at the Conference on 17 Dec. 2015 to Magistrate Kenneth Roll that he wrote Motions on to Dismiss on behalf of William Finck and Melissa Epperson. Why not for Eli James, Clifton Emahiser, William Shawn DeClue, and John Britton as well? Don't they as libeling Bryan Reo co-conspirators has as much right to Bryan Reo unauthorized practice of law as William Finck, Melissa Epperson, and Anthony D. Reo? William Shawn DeClue still libels Pastor Lindstedt as a "child molester" and is active in encouraging Bryan Reo to now sue Pastor Lindstedt's Church and domestic partner Roxie Fausnaught before the Mentor Municipal Court

16CVE00245 and as of 13 May 2016, Case # 16CV000825. John Britton still libels Pastor Lindstedt as a "child molester" but didn't act to take down Church web pages. And Clifton Emahiser, while not libeling Pastor Lindstedt as a "child molester" is as a Sephardic marrano Sicilian jew is working with the jew William Finck and the homosexual mongrel Bryan Reo to change Dual-Seedline Christian Identity doctrine and thus is likely involved in conspiring against Pastor Lindstedt and Lindstedt's Church Web pages.

So this Court isn't going to be able to protect Bryan Reo co-counter-defendants presently served and whom Bryan Reo argued in Motions drafted by Bryan Reo on behalf of William Finck and Melissa Epperson that this Court has no jurisdiction. Now that Bryan Reo has filed two more bogus lawsuits against Pastor Lindstedt's Church corporation and directors, then what exactly prohibits Pastor Lindstedt and Lindstedt's Church and Directors from suing not only the above-mentioned Reo co-conspirators but literally hundreds and thousands of people (and corporations like Rolls Royce) who are Bryan Reo co-conspirators and members of William Finck's Christogenea.org Internet synagogue across state and national lines hundreds and thousands of miles away? How does this Court claim jurisdiction over Internet communications only on behalf of Bryan Reo against Pastor Lindstedt and Lindstedt's Church and not against Bryan Reo co-conspirators like Anthony D. Reo, Bryan Reo's father, in Mentor Ohio, or Clifton Emahiser in Ohio, and William Shawn DeClue in St. Louis Missouri, or William Finck and Melissa Epperson in Panama City Florida? Even more to the point, what prohibits these co-conspirators and served interested parties from filing a Motion for a Continuance drafted by Bryan Reo when they are inconvenienced by having to appear for trial when they too don't acknowledge that this Lake County Court has any jurisdiction? The Mentor Municipal Court acknowledged Bryan Reo's malicious perjurous activities and chose to kick it up the circuit to Sodom / Painesville and let the crooked judges handle it as opposed to ending it with a \$15,000 summary judgment against Bryan Reo, the sole vexatious litigant over whom they have sole jurisdiction. This initial malicious case by Bryan Reo can't and won't be separate from the perjurous stalking case, 16CS000102, or the recent cases Reo v. Aryan Nations of Missouri, Mentor Municipal 16CVE00245 and 16CV000825. It will be far simpler and easier to simply summarily judge in this case for Pastor Martin Lindstedt for \$25,000 and let Bryan Reo spend the next year or two bitching before the Ohio Appellate and Supreme Courts that \$25,000 is unfair to assess for vexatious and malicious and frivolous litigation and abuse of legal process as

opposed to overseeing a half-dozen malicious cases per year against Pastor Lindstedt and another forty or so other individuals and corporations.

III Discovery is Over – And Bryan Reo Deliberately Played Games With Discovery

Discovery ended on May 2, 2016. As with the previous federal case, Bryan Reo demanded all manner of discovery while refusing to answer any of Pastor Lindstedt's discovery requests which were pretty much based upon Bryan Reo's own discovery documents. Magistrate Kenneth Roll admitted that Bryan Reo refused Pastor Lindstedt's discovery documents on a pretext so that Bryan Reo could claim that Lindstedt had to answer first.

Not that there was much need for discovery given that the entire fraudulent case Bryan Reo is suing about what Pastor Lindstedt has posted on Pastor Lindstedt's Church web pages that Bryan Reo can't any longer get fraudulently taken down under color of the DMCA. Pastor Lindstedt did indeed post a public record of filings made in the Western District of Missouri federal district court and saved anyone wanting to look and download those public federal court paying a dime per page on PACER. U.S. Magistrate Judge Matthew Whitworth didn't find these filings by Pastor Lindstedt in defending his Church against Bryan Reo vexatious and fraudulent filings particularly objectionable – not what with dismissing Bryan Reo's federal case. This posting of public documents from the federal courts is the only matter which can be litigated, even if this Court had jurisdiction – and filing a public record on an Internet page isn't actionable

Pastor Lindstedt admits that he has posted Facebook and Xuqa.com and other public pictures of Bryan Reo showing that this wannabe “White Supremacist” and “neo-nazi” and Christian Identity sub-pastor is anything but White, much less Aryan. Bryan Reo looks like it is negroid, and mongoloid, and effeminate and anything except white. So Pastor Lindstedt saying thousands of times that Bryan Reo is a homosexual mongrel isn't libel since true. Yet Bryan Reo and Reo co-conspirators, especially “Eli James” / Joseph November and William Finck calling Pastor Lindstedt a “convicted child molester” is knowing and malicious libel *per se*. Nor does it particularly matter that for purposes of this fraudulent litigation that Bryan Reo and Reo co-conspirators have taken down their libel *per se* from some of their web pages and hidden some of it on their forums to where you have to be a member to see it.

Bryan Reo claimed in his civil complaint that Pastor Lindstedt has lied about Bryan Reo threatening to murder an old Greek lady in a wheelchair who laughed at Bill Finck's pretense to being a Greek scholar. Yet Pastor Lindstedt has an e-mail from this old Greek woman thanking Pastor Lindstedt for finding out the identity of “SwordBrethren” who had threatened to murder

her while anonymous. Bryan Reo acts as if he has a “right” to threaten to murder people while anonymous on the Internet – and whines about Pastor Lindstedt discovering his identity.

Likewise, Bryan Reo admitted to the existence of an audio file of approximately 3 minutes and 16 seconds in which Reo yammers about gunning down law enforcement but claims that the suspected recorder, one Howard “Buck” McHugh, didn’t have legal authority for recording that audio file because he lived in California or Massachusetts. Recently, to counter one of Bryan Reo’s fraudulent and frivolous filing in getting another branch of this Lake County Court to give Bryan Reo a perjured civil stalking order (i.e. Reo v Lindstedt 16CS000102), Pastor Lindstedt submitted a file from Stormfront in which Bryan Reo talked of taking semi-automatic weapons in some sort of “Code-Red” exercise and gunning down FBI agents and other law enforcement. More recently, given that Bryan Reo was fired as a “serious security risk” as a “white supremacist neo-nazi” from the North Perry Nuclear Power Plant, there are pictures of people remembering Bryan Reo threatening to kill others with weaponry stored in the trunk of his car parked at the nuclear power plant.

Thus, not only because Bryan Reo has worked to be a public figure not only in the White Nationalist and Christian Identity racial Movement, but elsewhere as well, but because Bryan Reo talks about guns and grenades and explosives and threatens to use them to anyone who will listen – or record these delusional and violent blathering. Bryan Reo doesn’t actually deny being delusional and making threats to murder people but rather thinks that he has a “right” to remain anonymous while making threats of committing murder both individual and in groups.

Pastor Lindstedt submits that it is not libelous to post these murderous threats by Bryan Reo to warn law enforcement and average citizens that Bryan Reo is a self-loathing homosexual mongrel pretending to be a “white supremacist neo-nazi Aryan Nations member in good standing”. In fact, it is likely thanks to Pastor Lindstedt’s Church’s web page about Bryan Reo which lead to Bryan Reo being fired as a security risk from the nuclear power plant. Perhaps Pastor Lindstedt inadvertently saved 20-100 million lives and that is the good news. The bad news is that Cleveland and Lake County won’t glow in the dark from another Three Mile Island.

Contrary to Bryan Reo’s delusions about how Reo claims that the common law allows Bryan Reo to run wild threatening to murder old women and others while remaining safely anonymous, the Constitution of the U.S. and of Ohio say that Pastor Lindstedt and Lindstedt’s Church have a civil right to publish the truth as they see it. Pastor Lindstedt has a “good faith” belief – and plenty of proof to back it up, most of it from Bryan Reo itself – to report that Bryan

Reo isn't white, and likely isn't heterosexual, but rather is a mentally disturbed self-loathing mongrel homosexual who might well be the next school shooter and who is allowed by the corrupt Lake County Courts to file dozens of frivolous and vexatious and malicious lawsuits against not only Pastor Lindstedt and Lindstedt's Church, but other individuals and corporations as well. The number of cases before this Lake County Court numbers at least 42 and the cases before the federal district court in Cleveland is in the dozens. Bryan Reo is a professional Plaintiff *pro se*. Given the recent rash of everyday mass shootings – some of them of police and court personnel -- by disturbed and violent individuals collecting semi-automatic assault rifles by those fitting the profile of a mentally disturbed and vicious delusional loner like Bryan Reo this case will be lost by Bryan Reo before a jury who has to face these realities every day to where they won't overmuch care that some White Supremacist Aryan Nations pastor of an Aryan Nations Church proved that Bryan Reo doesn't belong within the White Supremacist community and hurt Reo's feelings – which are not worth a nickel, much less \$25,000 or \$10.75 million.

IV. The sheer number of Bryan Reo lawsuits against Pastor Lindstedt and Lindstedt's Church demonstrates malicious & vexatious abuse of legal process and malicious

prosecution. These are the past and current civil cases from the past year:

Reo v. Lindstedt, 14-5093-CV-SW-MJW WDMo dismissed

Reo v. Lindstedt, 15-3756 8th Circuit Court of Appeals. Asking that the DMCA be declared unconstitutional and Bryan Reo and Reo conspirators prosecuted federally

Reo v. Lindstedt, Lake County Ohio, 15CV00590, pending for trial 2 Aug. 2016

Reo v. Lindstedt, Lake County Ohio, CS16000102, pending appeal, bogus stalking case

Reo v. Aryan Nations, et. al, Mentor Municipal Court, CVE 1600245, pending (???)

Reo v. Aryan Nations, et. al, Lake County Ohio , 16CV000825 (Filed 13 May 16)

This is six cases within the past year with four of them before this Lake County Ohio Court, without any real jurisdiction and as a result of Bryan Reo fraud and perjury. The stalking case 16CS000102 involves Bryan Reo going to another web page and claiming that there Pastor Lindstedt filed death threats or incitements to murder in order to perjurally seek advantage in

this series of vexatious and malicious litigation. Bryan Reo threatened in an e-mail Monday January 11, 2016 at 11:29pm to file numerous frivolous lawsuits in Lake County:

<http://christian-identity.net/forum/showthread.php?p=13954#post13954> ←--- hyperlink

. . . *"If you insist on libeling me and casting the issue in a false light then I am perfectly willing to file a new lawsuit against you for this fresh libel, whether the case will be filed in Mentor Municipal Court or Lake County Court of Common Pleas . . ."*

Therefore, this proves that Bryan Reo files these malicious lawsuits solely as a harassing matter and for purposes of unjust enrichment through abuse of legal process which this Court criminally allows. There are forty other lawsuits within the past three years against persons and corporations, and they tell much the same sordid tale. Pastor Lindstedt has consulted with another victim of Bryan Reo's fraudulent litigation in which Bryan Reo admits to having a "special relationship" with this corrupt Lake County Court which allows Reo to file these frivolous lawsuits and that settling for a few thousand is cheaper than hiring an Ohio attorney to defend themselves from Bryan Reo's extortionary legal assaults under color of law. This Court has consistently revealed that it cares not for justice or due process of law, but rather in generating profitable litigation opportunities for Ohio lawyers, preferably local lawyers.

V. Bryan Reo's ORDERED "Answer" to Defendant's Counter-Claim of June 16, 2016 contains a bare assertion of denial on page one and five pages of delusional and irrelevant "Affirmative Defenses" – none of which answer Defendant's Counter-Claim.

Throughout the past two and a half years of Bryan Reo litigation against Pastor Lindstedt and Pastor Lindstedt's Church because Pastor Lindstedt found out the truth that Bryan Reo wasn't white and was severely disturbed and dangerous and posted these public facts on Church web pages, Bryan Reo has threatened to file motion after motion to strike. The federal court eventually figured out that Bryan Reo didn't have a case and dismissed the entire mess. Pastor Lindstedt has endeavored in vain to make the federal courts to either strike down the Digital Millennium Copyright Act (DMCA) because it was abused by Bryan Reo and Reo co-conspirators to destroy Church communications and property or to uphold the DMCA by prosecuting Bryan Reo and Reo co-conspirators for perjury and interstate wire fraud. The federal courts have essentially informed Pastor Lindstedt that the First Amendment of the Bill of Goods to the CONstitution in which Congress will make no law (such as the DMCA) which will infringe upon the peaceful promotion of religious practice and belief (in this case Dual-Seedline

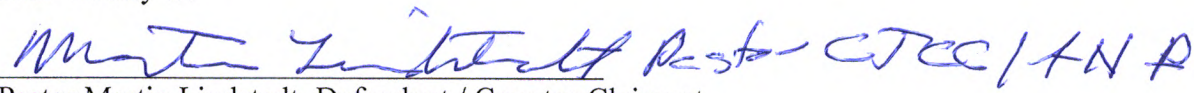
Christian Identity and DSCI racially exclusionary beliefs which expel Bryan Reo and Reo co-conspirators) which was abused by Bryan Reo and Reo co-conspirators. Looks like Pastor Lindstedt will have to make a choice upon begging YHWH for Divine Intervention (as happened against Sodom and Gomorrah) or practicing a sort of religious “self-help” which leads to the civil war against the Tribe of Benjamin or unleashing some industrial-strength religious whup-ass like The Thirty Years War. It is however doubtful that what is started in Lake County Ohio will remain confined to Lake County or even just Ohio, though.

Bryan Reo in the remaining five or six pages of its “Answer” merely regurgitates Reo’s novel legal theories and commits perjuries concerning the facts of this case in any event. Pastor Lindstedt found out Bryan Reo’s anonymous Internet identity which Reo used to threaten and harass people, found out Reo wasn’t white, and simply made it impossible for Bryan Reo to remain as a mongrel thorn bothering CI believers. Everything Pastor Lindstedt has done is to merely post publicly these facts on Lindstedt’s Church’s web pages and Bryan Reo wants this local county court in Ohio absent all jurisdiction to promote fraudulent legal process on Reo’s behalf and now to act as a means for Bryan Reo to claim that this unlawful civil proceedings continue at a time when Bryan Reo thinks most convenient. Bryan Reo is a mere 10 miles from its local preferred cash-register court of convenience and now wants a court date set back in December 2015 to be reset because it interferes with its travel plans? Why even this corrupt and treasonous Court shouldn’t dare grant this spurious motion against Pastor Lindstedt who lives 900 miles away and who has made arrangements for the care of his bed-bound elderly illiterate domestic partner Roxie Fausnaught on the trial date set in December 2015. Pastor Lindstedt notes that the Bryan Reo co-conspirators and interested persons like William Finck, Melissa Epperson, Bill DeClue, Clifton Emahiser and John Britton do not seem to have been served with Bryan Reo’s latest request for purpose of hindrance and delay. It is as if Bryan Reo has a secret corrupt arrangement with this corrupt Lake County Court absent all personal and subject-matter jurisdiction over Pastor Lindstedt and Lindstedt’s Church to hold a kangaroo court trial in which none of Bryan Reo’s co-conspirators are present but at a time set to coincide at Pastor Lindstedt’s ultimate inconvenience and inability to attend from 900 miles away. What is far more likely is that Bryan Reo decided that actually having a jury trial in Lake County would end up in a quick verdict of \$25,000 for abuse of legal process against Bryan Reo – the record is bare of Bryan Reo actually having a jury trial for any of Bryan Reo’s 42 & counting Lake County lawsuits and the dozen or so federal lawsuits. Bryan Reo’s only competence is in filing dozens of

motions to strike and for summary judgment and filing discovery demands for discovery which has nothing to do with the case at hand and then refusing to provide the discovery showing its criminal intent. So thus this latest scam to add to the expense and delay against Pastor Lindstedt.

Bryan Reo doesn't have a legitimate case. This Court lacks jurisdiction over anyone other than Bryan Reo for filing these fraudulent and vexatious cases. Bryan Reo's numerous co-conspirators all across the country shall have to appear for trial if this Court fraudulently claims jurisdiction over Pastor Lindstedt and Lindstedt's Church and Church Directors and they presumably won't find their court times expedient, and so this Court will have to accommodate them as well. Far easier to end the Bryan Reo litigation process by this Court summarily rendering a verdict for \$25,000 for abuse of legal process. In the alternative a trial date should be set seven months from now in February or March 2017, as Bryan Reo might be ready then.

Hail Victory !!!


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

Certificate of Service:

I, Pastor Lindstedt, posted a copy of the above posted on Lindstedt's Church web forum as of 22 July May, 2016 at below thread: <http://christian-identity.net/forum/showthread.php?1614>

And a true and genuine copy of this motion/brief/filing has been dispatched by United States mail, postage prepaid on 23 July 2016 to the following at:

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

William R. Finck, Melissa Epperson, 653 W. 23d Street, Suite 129, Panama City, Fl 32405

Also:

"Pastor Eli James" (Corporate name since 2005) or Joseph November, (legal name since 1981) at 4901 West Oakdale Avenue, Chicago, Illinois 60641

William Shawn DeClue, 3 Blanchette Drive, Florrissant, Missouri 63031

Clifton Emahiser, 1012 N. Vine Street, Fostoria Ohio 44830

John Britton, 1008 Williams Road, Emmett, Idaho 83617

