

**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

**DEFENDANTS AMENDED ANSWER AND COUNTER-CLAIM AS ORDERED**  
**(JURY DEMAND ENDORSED HEREON)**

COMES NOW the current Defendant / Counter-Claimant 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 Motion for Summary Judgment against professional Plaintiff *pro se* Bryan Reo who has been abusing legal process and carrying out the unauthorized practice of law on behalf of some of Reo's co-conspirator counter-defendants William Finck and Melissa Epperson and Bryan Reo's father Anthony D. Reo. 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 and the Mentor Municipal Court 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 against another forty individuals and corporations for abuse of legal process. 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 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. On April 30, 2016, while "Answering" Bryan Reo's latest lawsuit in the Mentor Municipal Court (Case # 16CVE00245) against Pastor Lindstedt and Lindstedt's Church it was discovered that Bryan Reo was fired from his job at a nuclear power plant after a series of nuclear incidents and a belated background check revealed that Bryan Reo was a homicidal "white-supremacist" neo-nazi who fantasized about murdering law enforcement officers in the FBI and Lake County Sheriff's Department. Thus is because of Pastor Lindstedt's honest expose of Bryan Reo that Bryan Reo was detected and fired from the North Perry Nuclear Power Plant. Therefore, because of telling these truths, possibly 10-50 million people in the area were kept from dying from a nuclear power plant going Chernobyl or Fukushima. It is doubtful that a jury in Lake County will find against Pastor Lindstedt and 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 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. (See Exhibit #1 Bryan Reo Civil Complaint# 16CVE00245 , Exhibit #2 Church Answer & Counter-Claim, # 16CVE00245 )

#### **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 state court somewhere when the state law sets limits for the cases to be processed locally. Practically all the events complained about by Bryan Reo occurred in 2010 to 2013, and Reo already tried and lost his litigation attempts in federal court, which dismissed as spurious and fraudulent Reo's claims. *Res judicata* applies, unless Reo wants to actually spend the \$400 to re-file in federal court, in which case the Northern District of Ohio shall kick it back to the Western District of Missouri for much the same result. The only timely thing Reo claims is that Pastor Lindstedt published the motions from the federal court proceedings on his Church's web page, and as a public record they are not actionable in any case, especially given that these filings were successful in getting Bryan Reo's fraudulent case at the federal level dismissed.

## **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.) Thus Eli James of Chicago Illinois would be in the exact same boat as Bryan Reo and William Finck. However, since Bryan Reo fell out with Eli James because Eli James said that jews and mongrels shouldn't be exterminated, while William Finck, another jew, claimed that jews and mongrels should be exterminated – while both jews knew full well Bryan Reo was and is a mongrel and likely homosexual. 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 still 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. Rather Bryan Reo was blackmailing John Britton for homosexual sex and interfered in collusion with Rolls Royce in a federal case to remove Pastor Lindstedt's Church web pages documenting this homosexual blackmail by Bryan Reo. 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 have 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 Ohio? 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 against other individuals and corporations.

### **III. Jurisdictional Issues.**



Bryan Reo, with his admitted unauthorized practice of law – which was indulged and permitted by Magistrate Kenneth Roll as opposed to being summarily punished by summary judgment in favor of Pastor Lindstedt at the Case Management Conference of 17 Dec. 2016 – admits on behalf of his co-conspirators William Finck and Melissa Epperson that there is no personal jurisdiction over Internet communications by this Lake County Court. How can there be an Internet if every single psychotic homosexual mongrel wanting to pretend to be a “white supremacist” and Dual-Seedline Christian Identity pastor and a “Social Justice Warrior” simultaneously got to file four or five malicious lawsuits against anyone exposing him as someone you don’t want working as a police officer or in a nuclear power plant or anything requiring mental and moral stability? For that matter, how can you have an Internet if Bryan Reo-style frivolous lawsuits are not only discouraged, but summarily punished?

If there are insuperable jurisdictional issues involving just one delusional wannabe pseudo-litigant and a few of his criminal conspirators, how much more when there are dozens and then hundreds of parties both interstate and international before this county court? And this is before the appeals kick in.

#### **IV 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 files 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.

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. Bryan Reo's fellow co-conspirators like Eli James and William Finck and others knew Bryan Reo's real name and racial heritage but lied about this and called Pastor Lindstedt a "child molester" as did Bryan Reo. Two of Bryan Reo's non-white mongrel co-conspirators – John Britton and "Victor Switzer" of Pine Bluff Arkansas had to endure homosexual blackmail by an obsessed Bryan Reo. 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 wanting to find out 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.

All this goes to show that not only Pastor Lindstedt and Hiram Reppert – who Bryan Reo sued before this Court for terminating Bryan Reo's nuclear power plant technician training at the Lakeland Community College because there was no way Bryan Reo was ever going to work in a



nuclear power plant again – but pretty much everyone who actually listens to Bryan Reo thinks that Bryan Reo is the next Adam Lanza or mass shooter for good reason.

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, isn't heterosexual, but rather is a mentally disturbed self-loathing mongrel homosexual who is likely 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*.

**V. 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 six months:

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



Reo v. Lindstedt, 15-3756 8<sup>th</sup> Circuit Court of Appeals (pending) 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. Having these frivolous lawsuits summarily punished by summary judgment will end this.

**VI. This Lake County Court is liable for allowing Bryan Reo malicious prosecution and abuse of legal process and the consequences of continuation of this corrupt misconduct will result in this Court being stripped of power and the judges possibly being disbarred and removed from office and a deserved contempt for this Court on the part of Ohio citizens and of others outside this Court's jurisdiction.**

This Lake County Court has allowed Bryan Reo to file four frivolous and malicious lawsuits against Pastor Lindstedt and Lindstedt's Church and now Pastor Lindstedt's domestic partner Roxie Fausnaught, who is 60 years old, in poor health, practically illiterate for the "crime" of being a director of Pastor Lindstedt's non-profit Church corporation. All this for posting public court records of filings before the federal district courts and the Lake County



Court. All this for posting that someone trying to be a public figure in White Supremacist, neo-nazi and Christian Identity circles was a self-loathing homosexual mongrel with a fascination for heavy weapons and explosives routinely threatening to murder, rape and assault others while trying to remain anonymous except to their criminal co-conspirators. Bryan Reo was allowed to work in a nuclear power plant until a series of preventable serious “accidents” resulted in a belated Google search to where the nuclear power plant operators and Nuclear regulatory commission found out – likely thanks to Pastor Lindstedt’s Church web pages – who and what Bryan Reo is and was. This Lake County Court allowing these Bryan Reo lawsuits is akin to the federal courts in New York City allowing Osama Bin Laden heirs to make an unlawful death claim against the U.S. Navy SEALs or ISIS terrorists to sue Obama. It sure won’t look good.

Magistrate Kenneth Roll listened to Bryan Reo admit to writing Motions to Dismiss for Lack of Jurisdiction on behalf of William Finck and Melissa Epperson and to defeat service against Bryan Reo’s father Anthony D. Reo. Roll haggled with Bryan Reo as to whether Pastor Lindstedt would be allowed to ask questions at a hypothetical Bryan Reo deposition and scoffed at Bryan Reo’s lies as to why Bryan Reo wouldn’t accept mailed discovery documents from Pastor Lindstedt. Rather than “ovulating” over what a great legal writer Bryan Reo was, Magistrate Roll should have summarily awarded Pastor Lindstedt the sum of \$25,000 summary judgment, called the bailiff and arrested Bryan Reo for contempt of court, and instigated civil proceedings against Bryan Reo for three instances of unauthorized practice of law.

Likewise Magistrate Adrienne S. Foster, when shown proof that Bryan Reo was committing perjury in making a bogus stalking charge against Pastor Lindstedt from over 900 miles away, or at the very least allowed Pastor Lindstedt to testify on his behalf via telephone rather than corruptly rule against Pastor Lindstedt because he didn’t intend to drive 900 miles to Lake County and back for that bogus proceedings. Then Judge Vincent Culotta rubber-stamped these corrupt and idiotic and perjurious proceedings conducted in the absence of Pastor Lindstedt – the very hallmark of a corrupt and vicious quasi-judicial proceeding.

Pastor Lindstedt is told by the clerks of these judges that they recognize that Bryan Reo is abusing legal process and that Reo’s myriad filings are designed solely to harass. However, Pastor Lindstedt is supposed to hire an attorney to protect himself and his Church from the corrupt antics enabled by these corrupt judges.

Rather, using the Internet, Pastor Lindstedt and Pastor Lindstedt’s Church will point out that these judges and this Lake County Court is absolutely corrupt and treasonous and that they



need to be held to account until they are stripped of all power and jurisdiction and punished to the full extent of the law of the People. Pastor Lindstedt has much experience in suing judges in Missouri and while it is difficult to nearly impossible to civilly sue a judge, it is laughably easy to destroy the reputation of a lawyer or a judge because pretty much everyone expects them to be corrupt and stupid. Pastor Lindstedt and Pastor Lindstedt's Church contemplates a whole lot of appeals and litigation while noticing that so far that Bryan Reo doesn't seem to be able to explain himself at the appellate level and perhaps the Lake County District Attorney and Ohio Attorney General's Office might get tired of defending Bryan Reo perjury and Lake County Ohio judicial corruption and incompetence.

Far easier to permanently end Bryan Reo vexatious and malicious litigation by a summary judgment for \$25,000 in favor of Defendant(s).

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 14 May, 2016 at below thread: <http://christian-identity.net/forum/showthread.php?1665>

And a true and genuine copy of this motion/brief/filing has been dispatched by United States mail, postage prepaid on 14 May 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

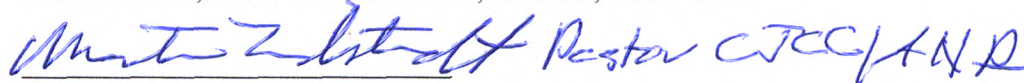
Also:

**"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, Florissant, Missouri 63031

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

**John Britton**, 1008 Williams Road, Emmett, Idaho 83617



Pastor Martin Lindstedt