

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
SOUTHWESTERN DIVISION**

BRYAN ANTHONY REO, et. al.,)	
Plaintiff/Counter-Defendant(s))	
)	
vs.)	No. 14-5093-CV-SW-MJW
)	
PASTOR MARTIN LINDSTEDT, CHURCH)	
OF JESUS CHRIST CHRISTIAN/ARYAN)	
NATIONS OF MISSOURI,)	
Defendant(s)/Counter-Claimants.)	

PETITION FOR PROTECTIVE ORDER DISALLOWING BRYAN REO & REO CO-CONSPIRATOR CO-COUNTER-DEFENDANTS & OTHERS FROM DESTROYING CHURCH INTERNET SITES UNDER COLOR OF THE DIGITAL MILLENNIUM COPYRIGHT ACT WHILE THIS CASE IS UNDER APPEAL

COMES NOW the current Defendant(s)-Counter-Claimants Pastor Martin Lindstedt and Lindstedt’s non-profit church corporation in good standing The Church of Jesus Christ Christian / Aryan Nations of Missouri (hereafter in person described as “Pastor Lindstedt” and the Church corporation referred to as “Pastor Lindstedt’s Church”) to file for a Protective Order enjoining and preventing Bryan Reo and Bryan Reo’s known and unknown Co-Conspirator Co-Counter-Defendants from improperly abusing the Digital Millennium Copyright Act (hereafter DMCA) to further take down or Terms of Service (TOS) takedown the Internet forums, blogs, e-mail lists, and web pages in whatever electronic form for posting the “fair-use” pictures of Bryan Reo consisting of Bryan Reo’s public Facebook profile picture of early 2010, three Xuqa.com public profile pictures (all long since taken down) and any and all parody pictures derived from these social media pictures by Pastor Lindstedt and unknown others.

This Court dismissed the lawsuit filed by Bryan Reo against Pastor Lindstedt and Pastor Lindstedt’s Church along with the counter-suit filed by Lindstedt and Church against Bryan Reo and around forty known and unknown Reo co-conspirators and co-counter-defendants. The Bryan Reo lawsuit was frivolous and without any merit under the DMCA and since there was no other diversity of citizenship subject-matter jurisdiction, this Court dismissed the litigation without prejudice. In Pastor Lindstedt’s Rule 59(e) Motion to Alter or Amend this Court’s

decision, we pointed out that Bryan Reo and Reo co-conspirator co-counter-defendants violated subsection (f) of the Digital Millennium Copyright Act, 17 U.S.C. § 512(f) and by abusing the DMCA also violated 42 U.S.C. § 1983, 1985 for conspiracy to violate Pastor Lindstedt's and his Church's right to practice their religion and other civil rights. Thus this Court has federal jurisdiction under U.S.C. § 512(f) and under 42 U.S.C. § 1983, 1985 to hear Pastor Martin Lindstedt's and The Church's counter-suit. This Court decided to flush the matter altogether on Oct. 16, 2015 in its ORDER dismissing the entire case. So therefore Pastor Lindstedt and his Church must appeal in order to end the persecution under color of law of their Internet communications and Church activities by bringing Bryan Reo and Reo's co-conspirator co-counter-defendants back to trial and for the Digital Millennium Copyright Act to be abolished as unconstitutional because it allows such as Bryan Reo to destroy religious freedom and expression of same by allowing fraudulent DMCA takedown notices to censor religious and personal expression under color of the DMCA without civil or criminal consequence.

So until this matter is sorted out, probably years later, Pastor Lindstedt and Lindstedt's Church is asking this Court – which foolishly allowed Bryan Reo and Reo's co-conspirators to proceed *in forma pauperis* on their groundless, frivolous and baseless civil suit for over a year – to provide a protective order prohibiting Bryan Reo and Reo co-conspirators from further interference under color of law from claiming violation of the DMCA when this Court has already ruled that there was no DMCA violations in the first place.

FACTS SHOWING THAT A PROTECTIVE ORDER IS NECESSARY

This Court figured out and admitted in its Sept. 10, 2015 ORDER that Bryan Reo's claim under the DMCA was “devoid of facts that would conceivably support a basis for a claim under the DMCA.” “. . . Allowing an amendment to Plaintiff's DMCA claim would be futile. . . ” “. . . After careful consideration, the Court has doubts that the alleged amount in controversy is either presented in good faith or substantiated.”

Bryan Reo NEVER had good faith in presenting this litigation. The first time Pastor Lindstedt published the Bryan Reo Facebook Public Profile Picture (Exhibit #1, Page 7) on the Church forum on or around Oct. 29, 2010, Bryan Reo made a DMCA Take-Down Notice to hostmonster.com and oneandone.com on Nov. 15, 2010 claiming that a social media public profile picture was altogether his private intellectual property and that there was no “fair use” to Pastor Lindstedt letting everyone know that this pretend “White Supremacist” and “Christian

Identity sub-pastor” see that Bryan Reo wasn’t even remotely white, much less Aryan Christian Israelite. Pastor Lindstedt presented a DMCA Counter-Notice on Nov. 18, 2010, thus mandating under the DMCA that Bryan Reo file a lawsuit in federal district court to prove up his claim. Yet on Nov. 28, 2010 Bryan Reo called in to Pastor Lindstedt’s Talkshoe Show, The Movement Turd, and after calling Pastor Lindstedt a pedophile admitted that Reo had no intention of filing a DMCA lawsuit any time soon after having Lindstedt’s Church’s web pages taken down permanently on hostmonster.com and oneandone.com. Then Bryan Reo proceeded to bait John Britton into threatening to rape John Britton’s wife and daughters. Later Bryan Reo would interfere with John Britton’s federal civil lawsuit involving a helicopter crash and file a bogus police report against Pastor Lindstedt, John Britton and Russ Walker before the Lake County Ohio Sheriff’s Department. In fact, Bryan Reo lied to this federal court and the Ohio federal court as to the origins of this Lexus-Nexus printout on Bryan Reo.

Later, when Bryan Reo was getting Pastor Lindstedt’s Church’s web pages kicked off of CrisisHost.com in early April 2014, Pastor Lindstedt republished the Bryan Reo public Facebook profile picture to induce Bryan Reo’s fraudulent DMCA lawsuit before the Cleveland Ohio federal court. However, since Bryan Reo had already filed his bogus DMCA lawsuit against Lindstedt on April 16, 2014 against the CrisisHost.com Facebook posting and didn’t want to amend his pleading, Reo instead notified Dreamhost.com on April 17, 2014 that litigation had been filed and implied that it was because of the Bryan Reo Facebook profile page which had yet to be counter-noticed by Pastor Lindstedt at Dreamhost.com. See Exhibit #1, page 5. The rest of the Exhibit pages were devoted to Pastor Lindstedt’s frustration that Bryan Reo could preemptively censor Church web pages by merely filing a lawsuit and waiting for this litigation to wind its way through the court process without being able to restore public fair use content. Thus Bryan Reo will deliberately commit perjury in order to unlawfully censor under color of the DMCA time and again.

Exhibit #1, Page 8 is a parody of a parody picture in which Bryan Reo made a fraudulent DMCA take-down notice concerning some picture that some NIM-Buster made for a parody song Lindstedt sang. This picture was derived in small part from Bryan Reo’s XuQa.com social media gaming site pictures and was also lawful “fair use” yet still fraudulently DMCAed.

Exhibit #2 concerns Bryan Reo’s XuQa.com gaming site profile and four pictures of Bryan Reo which someone who had worked with Bryan Reo in taking down other web pages sent the link to John Britton, who in turn sent it to Pastor Lindstedt, who saved the pictures and


sent them on to everyone in the Movement. Every so often Pastor Lindstedt would put one of them up, Bryan Reo would yelp out a fraudulent DMCA takedown notice and then Lindstedt would take them down without a Counter-Notice, although these Reo pictures are also fair use and not copyrightable in any case. Bryan Reo would blame Pastor Lindstedt for what other parties used of them to ridicule Bryan Reo.

Exhibit #3 is an Affidavit with Exhibits to the Lake County Ohio Court of Common Pleas that Bryan Reo, who is suing Pastor Lindstedt for \$25,000 there for much the same crap as was dismissed by this Court for \$10.75 million here. In this affidavit, Pastor Lindstedt shows that Lake County judge that Bryan Reo knows that it was one Russell Walker who published the Lexus-Nexus Bryan Reo pdf file which John Britton's lawyer Stuart McCarty gave to Britton so as to punish Reo for interfering in Britton's civil federal case and that Bryan Reo has knowingly committed perjury to not only the Lake County judge, but to this U.S. Magistrate Judge Matthew Whitworth and to U.S. Judge James Guin of the Northern District of Ohio as well.

This Judge Whitworth promised to notify the U.S. Attorney for the Western District of Missouri if any party at the Feb. 13, 2015 Scheduling Conference committed a criminal act. Well, unrelenting perjury and fraud is a criminal act, Judge Matthew Whitworth. Time to stand and deliver on your so-far hollow threats of justice.

Wherefore, Pastor Martin Lindstedt and his Church ask for a protective ORDER preventing Bryan Reo and Reo's co-conspirators from taking down Pastor Lindstedt's Church's web pages and preventing prior restraint while this case is in appeal, and possibly making a complaint to the U.S. Attorney concerning Bryan Reo's perjury.

Hail Victory!!!


Pastor Martin LD Lindstedt, pastorlindstedt@gmail.com
Church of Jesus Christ Christian/Aryan Nations of Missouri
338 Rabbit Track Road, Granby Missouri 64844 (417) 472-6901
CC: Exhibit #1, Dreamhost.com correspondence and Bryan Reo Facebook picture
Exhibit #3 Lake County Ohio Affidavit Concerning Bryan Reo perjury

Certificate of Service

Pastor Martin Lindstedt certifies that he mailed a copy of this Motion for ORDER plus exhibits and proposed ORDER on Tuesday November 10, 2015 to Bryan Reo and Anthony D. Reo, (Bryan Reo's father already served with a copy of the counter-claim and given a waiver plus stamped envelope to return waiver) living at 7143 Rippling Brook Lane, Mentor Ohio 44060

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Upon showing good cause for Bryan Reo and any of Bryan Reo's known and unknown co-conspirators being civilly constrained from further using and abusing the Digital Millennium Copyright Act while this case undergoes appeal, Bryan Reo and Reo's co-conspirators are forbidden to make any new or continuing DMCA Takedown Notices or Terms of Service complaints against Pastor Lindstedt or Pastor Lindstedt's Church Internet pages.

Matthew Whitworth,
U.S. Magistrate Judge

Date: