

15CV001590 REO, BRYAN ANTHONY vs. LINDSTEDT, MARTIN RLC

Case Type: (CV) CIVIL
 Case Status: Open
 File Date: 09/18/2015
 DCM Track:

Action: CIVIL
 Status Date: 09/18/2015
 Case Judge: COLLINS, JR, RICHARD L
 Next Event:

All Information Party Docket Disposition

*Lawsuit #27***Party Information****REO, BRYAN ANTHONY - Plaintiff**

Disposition
 Disp Date

Address 7143 RIPPLING BROOK
 LANE
 MENTOR, OH 44060

Alias

Party Attorney

LINDSTEDT, MARTIN - Defendant

Disposition
 Disp Date

Address 338 RABBIT TRACK ROAD
 GRANBY, MO 64844

Alias

Party Attorney

Docket Information

Date	Docket Text
09/18/2015	Initial civil action deposit Receipt: 320877 Date: 09/18/2015
09/18/2015	Complaint, case designation sheet, pre-trial order, filed. Receipt: 320877 Date: 09/18/2015
09/24/2015	Issue Date: 09/24/2015 Service: Summons and all pleadings listed - certified mail Method: CERTIFIED MAIL Cost Per: \$2.00 writ \$ 7.45 postage LINDSTEDT, MARTIN 338 RABBIT TRACK ROAD GRANBY, MO 64844 Tracking No: 9414726699042033234914
10/02/2015	Certified RR#234914 ** to MARTIN LINDSTEDT ** returned and filed. Service date 9/29/15*

Case Disposition

Disposition	Date	Case Judge
Undisposed		COLLINS, JR, RICHARD L

Exhibit #1

SUMMONS
COURT OF COMMON PLEAS
LAKE COUNTY OHIO

BRYAN ANTHONY REO
Plaintiff

VS.

Case Number: **15CV001590**
Judge RICHARD L COLLINS JR

MARTIN LINDSTEDT
Defendant

To the following named DEFENDANT(S):
MARTIN LINDSTEDT
338 RABBIT TRACK ROAD
GRANBY MO 64844

You have been named a Defendant in a complaint filed in the Lake County Court of Common Pleas, Lake County Courthouse, Painesville, Ohio. A copy of the complaint is attached hereto. The name and address of the plaintiff's attorney is:

You are hereby summoned and required to do the following:

1. Within 28 days after service of this Summons upon you, serve a copy of an Answer to the Complaint on the Plaintiff's Attorney or on the Plaintiff, if he/she has no attorney of record;
2. Within 3 days after you serve the Plaintiff or the Plaintiff's Attorney, file an Answer with your original signature with the Lake County Clerk of Court.

Calculations of time are exclusive of the day of service.

If you fail to appear and defend, judgment by default will be rendered against you for the relief demanded in the complaint.

Maureen G. Kelly
Clerk, Court of Common Pleas
Lake County, Ohio
25 N. Park Place
Painesville OH 44077

By Mary Jo Stack
Deputy Clerk

September 24, 2015

FILED
2015 SEP 18 P 3:17
MAUREEN G. KELLY
LAKE CO. CLERK OF COURT

**STATE OF OHIO
IN THE COURT OF COMMON PLEAS OF LAKE COUNTY
CIVIL DIVISION**

BRYAN ANTHONY REO
7143 Rippling Brook Lane
Mentor, OH 44060

Plaintiff,

v.

MARTIN LINDSTEDT
338 Rabbit Track Road
Granby, MO 64844

Defendant.

**15CV001590
RICHARD L COLLINS JR**

BRYAN ANTHONY REO
7143 Rippling Brook Lane
Mentor, OH 44060
(P): (440) 313-5893
(E) roodeplaat1983@gmail.com
Pro se Plaintiff

PLAINTIFF'S COMPLAINT
(JURY DEMAND ENDORSED HEREON)

BRYAN ANTHONY REO (Plaintiff), alleges the following against MARTIN LINDSTEDT (Defendant):

I. INTRODUCTION

1. Plaintiff sues Defendant in the instant civil action for tortious conduct related to Defendant's campaign of cyber harassment against Plaintiff via the World Wide Web.

II. PARTIES

2. Plaintiff is a natural person who resides in Mentor, Lake County, Ohio. Plaintiff is a private—and not a public—figure.

3. Defendant is a natural person of the State of Missouri who resides at 338 Rabbit Track Road, Granby, MO 64844.

III. JURISDICTION AND VENUE

4. This Court enjoys subject matter jurisdiction over the instant civil action because the amount in controversy exceeds five hundred dollars (\$500.00). R.C. § 2305.01.

5. This Court enjoys personal jurisdiction over Defendant because Defendant caused tortious injury to Plaintiff in the State of Ohio by an act outside of the State of Ohio that was committed by Defendant with the purpose of injuring Plaintiff when Defendant might reasonably have expected that Plaintiff would be injured in the State of Ohio. R.C. § 2307.382(A)(6); Civ.R. 4.3(A)(9); *Kauffman Racing Equip., L.L.C., v. Roberts*, 126 Ohio St.3d 81, (Ohio 2010) (holding that a non-commercial website intentionally used to defame an Ohio resident provides Ohio courts personal jurisdiction over foreign tortfeasor).

6. Venue is proper with this Court because Plaintiff resides in Lake County, State of Ohio, and the Court's personal jurisdiction over Defendant exists via Civ.R. 4.3. Civ.R. 3(B)(7).

IV. STATEMENT OF FACTS

7. Plaintiff first came into contact with Defendant in early 2010 when Defendant was invited into a lively Internet chatroom discussion in which the topics that were discussed involved hunting, camping, target shooting, outdoor activities, and politics. A dispute arose

between Plaintiff and Defendant during the discussion at which time Defendant promised to ascertain the real-life identity of Plaintiff—which was then not known to Defendant—to destroy Plaintiff's reputation.

8. Towards the later part of 2010, Defendant succeeded in ascertaining Plaintiff's identity and began a relentless campaign of harassment that continues to the present day whereby (1) Defendant posted photographs of Plaintiff and Plaintiff's personal phone number onto pornographic websites; (2) Defendant impersonated Plaintiff on the World Wide Web to purport to third-parties that Plaintiff supports child molestation; and (3) Defendant published statements on the World Wide Web that state that Plaintiff is a homosexual, a drug dealer, a con-man, a murderer, a pawn store owner, a "Jewish pimp," engages in insurance fraud, and has syphilis and other venereal diseases. Defendant further defamed Plaintiff by claiming that Plaintiff had threatened to murder an elderly woman and rape another woman.

9. Plaintiff does not support child molestation and Plaintiff is not a homosexual, a drug dealer, a con-man, a murderer, a pawn store owner, or a "Jewish pimp," Plaintiff does not engage in insurance fraud, and Plaintiff does not have syphilis or any other venereal disease. Plaintiff has never threatened to murder any elderly women nor rape any women.

10. At the time Defendant published the false and defamatory statements about Plaintiff as detailed in Paragraph 8 of this Complaint, Defendant had actual or constructive knowledge to believe that Plaintiff does not support child molestation and Plaintiff is not a homosexual, a drug dealer, a con-man, a murderer, a pawn store owner, or a "Jewish pimp," Plaintiff does not engage in insurance fraud, and Plaintiff does not have syphilis or any other venereal disease.

11. In March of 2011, Defendant acquired via a LexisNexis report Plaintiff's voter registration, political party affiliation, vehicle registration, vehicle license plate number, and

social security number and publicly disseminated this confidential information via the medium of the World Wide Web to a significant number of third-parties.

12. Between March and July of 2015 Defendant published defamatory remarks, in print format, online, declaring that Plaintiff had committed perjury, wire fraud, and mail fraud, and was engaged in fraudulent conduct in a then ongoing court proceeding.

13. Plaintiff has never committed perjury, wire fraud, or mail fraud and was never engaged in fraudulent conduct at any time during the relevant court proceeding.

14. Due directly and proximately to Defendant's Internet campaign of harassment against Plaintiff as detailed within this Complaint, Plaintiff has suffered damage to Plaintiff's reputation which will adversely affect Plaintiff's ability to procure employment in the future, and Plaintiff has suffered mental anguish in the form of anger, stress, frustration, anxiety, humiliation, and disgust.

15. Defendant has caused injury to Plaintiff in excess of twenty-five thousand dollars (\$25,000.00).

16. Plaintiff previously sued Defendant in federal court over the controversy at issue in the instant civil action, but said civil action was dismissed without prejudice within the past year for lack of subject matter jurisdiction due to diversity jurisdiction not being properly shown by Plaintiff. Plaintiff hereby invokes R.C. § 2305.19(A), which pertinently provides that "In any action that is commenced * * *, if the plaintiff fails otherwise than upon the merits, * * * the plaintiff's representative may commence a new action within one year after the date of * * * the plaintiff's failure otherwise than upon the merits[.]" *Menno v. Salem Hunting Club*, 7th Dist. Columbiana No. 11CO2, 2012-Ohio-4553, ¶ 13 ("When a complaint is refiled under the saving

statute, the case relates back to the date of the original complaint for purposes of satisfying any statute of limitations problems.”)

V. TRIAL BY JURY DEMANDED

17. Plaintiff respectfully demands a trial by jury on all of the issues set forth herein that are triable by right. Civ.R. 38.

VI. CAUSES OF ACTION

COUNT I COMMON LAW DEFAMATION

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

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

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

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

22. Defendant failed to act reasonably in attempting to discovery the truth or falsity or defamatory character of Defendant's publication about Plaintiff.

23. 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. Defendant committed against Plaintiff the common law tort of libel per se.

COUNT II
COMMON LAW INVASION OF PRIVACY – FALSE LIGHT

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

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

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

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

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

30. 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. Defendant committed against Plaintiff the tort of invasion of privacy – false light.

COUNT III
COMMON LAW INVASION OF PRIVACY – PUBLIC DISCLOSURE OF PRIVATE FACTS

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

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

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

35. Defendant's disclosure of private facts about Plaintiff was done intentionally.

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

37. Defendant committed against Plaintiff the tort of invasion of privacy – public disclosure of private facts.

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

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

39. 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. Plaintiff has a reasonable expectation of privacy in his solitude, seclusion, and/or private concerns or affairs.

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

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

43. Defendant committed against Plaintiff the tort of invasion of privacy – invasion of seclusion.

**COUNT V
PUNITIVE DAMAGES**

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

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

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

47. 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. Plaintiff is entitled to punitive damages from Defendant.

**COUNT VI
PERMANENT INJUNCTION**

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

50. 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. 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 Plaintiff's reputation.

52. The entry of a permanent injunction will not unduly harm or burden Defendant because Defendant is required as a matter of law to refrain from tortiously harming Plaintiff's reputation via the World Wide Web.

53. Public policy favors the entry of a permanent injunction because such relief will prevent unlawful conduct and will preserve and protect Plaintiff's reputation from further injury.

54. 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.

VII. PRAYER FOR RELIEF

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.

Respectfully submitted,


Bryan Anthony Reo
7143 Rippling Brook Lane
Mentor, OH 44060
(P): (440) 313-5893
(E): roodeplaat1983@gmail.com
Pro se Plaintiff

CERTIFIED MAIL®

Maureen

Clerk of Common Pleas Court

25 N PARK PLACE
PAINESVILLE, OHIO 44077



9414 7266 9904 2033 2349 14

15CV001590

3414 7266 9904 2033 2349 14

MARTIN LINDSTEDT
338 RABBIT TRACK ROAD
GRANBY, MO 64844

15CV001590

Search Results

Displaying all 28 matches.

Lake County lawsuits of Bryan Neo #1-25

<u>Case Number</u>	<u>Case Type</u>	<u>File Date</u>	<u>Initiating Action</u>	<u>Party/Company</u>	<u>Party Type</u>	<u>Date of Birth</u>	<u>Case Status</u>	<u>Affiliation</u>
<u>13CV001717</u>	(CV) CIVIL	08/05/2013	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>13CV002680</u>	(CV) CIVIL	12/13/2013	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>15CV001591</u>	(CV) CIVIL	09/18/2015	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Open	
<u>13CV001966</u>	(CV) CIVIL	09/09/2013	PERSONAL INJURY	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>13CV002561</u>	(CV) CIVIL	11/26/2013	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>13CV002705</u>	(CV) CIVIL	12/18/2013	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>13CV002707</u>	(CV) CIVIL	12/18/2013	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>13CV002760</u>	(CV) CIVIL	12/24/2013	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>13CV002778</u>	(CV) CIVIL	12/26/2013	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>13CV002797</u>	(CV) CIVIL	12/30/2013	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>14CV000129</u>	(CV) CIVIL	01/16/2014	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>14CV000270</u>	(CV) CIVIL	02/04/2014	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>14CV000402</u>	(CV) CIVIL	02/18/2014	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>14CV000477</u>	(CV) CIVIL	02/25/2014	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>14CV000868</u>	(CV) CIVIL	04/16/2014	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>14CV001028</u>	(CV) CIVIL	05/13/2014	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>14CV002453</u>	(CV) CIVIL	12/31/2014	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>15CV000702</u>	(CV) CIVIL	04/24/2015	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Open	
<u>15CV000703</u>	(CV) CIVIL	04/24/2015	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>15CV000961</u>	(CV) CIVIL	06/09/2015	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>15CV000962</u>	(CV) CIVIL	06/09/2015	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>15CV000973</u>	(CV) CIVIL	06/10/2015	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>15CV000974</u>	(CV) CIVIL	06/10/2015	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	
<u>15CV001253</u>	(CV) CIVIL	07/27/2015	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Open	
<u>15CV001254</u>	(CV) CIVIL	07/27/2015	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Closed	

Showing 1 to 25 of 28

<< < 1 2 > >>

Search Results

Displaying all 28 matches.

Case Number	Case Type	File Date	Initiating Action	Party/Company	Party Type	Date of Birth	Case Status	Affiliation
<u>15CV001504</u>	(CV) CIVIL	09/04/2015	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Open	
<u>15CV001590</u>	(CV) CIVIL	09/18/2015	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Open	<i>Lindskelt Defendant</i>
<u>15CV001714</u>	(CV) CIVIL	10/06/2015	CIVIL	REO, BRYAN ANTHONY	Plaintiff		Open	

Showing 26 to 28 of 28

<< 1 2 >>

*Bryan Reo Lawsuits #26-28
 Pastor Lindskelt is Defendant in #27*

15CV001504 REO, BRYAN ANTHONY vs. OHIO GAS & ELECTRIC JPO

Case Type: (CV) CIVIL
 Case Status: Open
 File Date: 09/04/2015
 DCM Track:

Action: CIVIL
 Status Date: 09/04/2015
 Case Judge: O'DONNELL, JOHN P
 Next Event:

All Information Party Docket Disposition

Lawsuit #26

Party Information**REO, BRYAN ANTHONY - Plaintiff**

Disposition
 Disp Date

Address 7143 RIPPLING BROOK
 LANE
 MENTOR, OH 44060

Alias

Party Attorney

OHIO GAS & ELECTRIC - Defendant

Disposition
 Disp Date

Address 100 E CAMPUS VIEW BLVD
 SUITE 250
 COLUMBUS, OH 43235

Alias

Party Attorney

Docket Information

Date	Docket Text
09/04/2015	Initial civil action deposit Receipt: 319828 Date: 09/04/2015
09/04/2015	Complaint, case designation sheet, pre-trial order, filed. Receipt: 319828 Date: 09/04/2015
09/09/2015	Issue Date: 09/09/2015 Service: Summons and all pleadings listed - certified mail Method: CERTIFIED MAIL Cost Per: \$2.00 writ \$7.67 post OHIO GAS & ELECTRIC 100 E CAMPUS VIEW BLVD SUITE 250 COLUMBUS, OH 43235 Tracking No: 9414726699042033214671
09/17/2015	Certified RR# 2146 71 to Ohio Gas & Electric returned and filed. Service date none given mm

Case Disposition

Disposition	Date	Case Judge
Undisposed		O'DONNELL, JOHN P

15CV001714 REO, BRYAN ANTHONY vs. MARATHON GROUP JPO

Case Type: (CV) CIVIL
Case Status: Open
File Date: 10/06/2015
DCM Track:

Action: CIVIL
Status Date: 10/06/2015
Case Judge: O'DONNELL, JOHN P
Next Event:

All Information Party Docket Disposition

Case # 28

Party Information

REO, BRYAN ANTHONY - Plaintiff

Disposition
Disp Date

Address 7143 RIPPLING BROOK
LANE
MENTOR, OH 44060

Alias

Party Attorney

MARATHON GROUP - Defendant

Disposition
Disp Date

Address 1710 CORPORATE
CROSSING
O'FALLON, IL 62269

Alias

Party Attorney

Docket Information

Date Docket Text

10/06/2015 Initial civil action deposit Receipt: 322259 Date: 10/06/2015

10/06/2015 Complaint, case designation sheet, pre-trial order, filed. Receipt: 322259 Date: 10/06/2015

Case Disposition

Disposition

Date

Case Judge

Undisposed

O'DONNELL, JOHN P