

**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.)	

MOTION UNDER RULE 59(e) FEDERAL RULES OF CIVIL PROCEDURE FOR THIS COURT TO ALTER OR AMEND ITS SEPTEMBER 10, 2015 ORDER DISMISSING PLAINTIFF *IN FRAUD* BRYAN REO'S BOGUS CLAIMS WITHOUT PREJUDICE

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 timely file this Rule 59(e) Motion for this Court to Alter or Amend its September 10, 2015 ORDER dismissing with prejudice the fraudulent and criminal litigation initiated by Plaintiff *in fraud* Bryan Reo and allowing Reo to peddle this case before a third jurisdiction the same fraudulent claims that Pastor Lindstedt and Lindstedt's Church web pages have somehow caused severe emotional distress upon Reo for publicly printing upon the Internet Reo's criminal activity. While Pastor Lindstedt and Lindstedt's Church agree that Bryan Reo and Reo's criminal co-conspirators and co-counter defendants indeed never had any jurisdiction under the Digital Millennium Copyright Act (hereafter DMCA) because they knowingly, fraudulently and maliciously abused the provisions of the DMCA in order to take down Pastor Lindstedt's and Lindstedt's Church's blogs, forums, web pages, e-mail and other Internet communications, and have engaged in a criminal conspiracy and fraud to do so, this Court has in essence allowed this criminality and fraud to go unpunished. Under the DMCA this Court has jurisdiction to hear Pastor Lindstedt's and Lindstedt's Church's counter-suit under subsection (f) of the Digital Millennium Copyright Act,

17 U.S.C. § 512 (hereafter DMCA), which provides a cause of action against any person who “knowingly materially misrepresents that material or activity infringes a copyright to utilize the DMCA’s takedown notice procedures.” See 17 U.S.C. § 512(f). Plaintiff /Counter-Defendant Bryan Reo, Bryan Reo’s father Anthony D. Reo, “Pastor” Eli James / Joseph November, formerly known (maybe) as Joseph Kutz or Joseph Putz, real birth name unknown, and William Raymond Finck, Jr. have conspired against Pastor Lindstedt and Pastor Lindstedt’s Church to fraudulently abuse under color of law the DMCA in order to take down Defendant’s web pages, forums, blogs, and Internet communications and Pastor Lindstedt has proof of this ongoing misconduct. These counter-defendants are also liable under 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. Plaintiff / Counter-Defendant Bryan Reo and Reo’s Co-Counter-Defendants have violated U.S. Code . § 242 in abusing the DMCA to violate Pastor Lindstedt and Lindstedt’s Church’s Constitutional rights to free speech and right to practice their religion of genuine True Orthodox Comparetian Dual-Seedline Christian Identity and have violated U.S. Code . § 241 in conspiring to violate Pastor Lindstedt’s and Lindstedt’s Church of these rights as well. While U.S.C. § 241 and 242 are criminal statutes as opposed to civil statutes, in order for the federal government to defend its DMCA provisions the U.S. Attorneys of both the Western District of Missouri and the Northern District of Ohio will have to prosecute Bryan Reo and Reo’s co-conspirators.

This Court has improperly bent over backwards to allow fraudulent Plaintiff Bryan Reo a chance to present his bogus and fraudulent and unverified by any oath civil complaint while at the same time striking and ignoring Pastor Lindstedt’s amended and verified by oath answers designed to get Bryan Reo’s co-conspirators involved in this case in compliance with this own Court’s Scheduling Order. Pastor Lindstedt did attempt to inform this Court that it was unlikely that Bryan Reo would get \$10.75 million in spurious damages before a Springfield Missouri jury because Pastor Lindstedt posted a public Facebook profile picture of an obviously effeminate with negroid and mongoloid featured Bryan Reo. In fact this Scheduling Conference was set up by this Court in response to lies made by Bryan Reo concerning a call made to Pastor Lindstedt’s rectory in which Reo made a number of threats. This Court has acted more like a U.S. Attorney working for the Federal Bureau of Investigation or the Department of Homeland Security trying to use an Anti-Racist Activist (like say Bryan Reo and Reo’s co-conspirators) in order to

suppress a domestic dissident pastor and his perceived church group (like say, Pastor Martin Luther Dzerzhinsky Lindstedt, ArchBishop of Missouri and The Church of Jesus Christ Christian / Aryan Nations of Missouri). This Court has been like a “love doll” used by Bryan Reo.

What Pastor Lindstedt and Lindstedt’s Church seek by this Rule 59(e) Motion is to get this Court to realize that Bryan Reo and Bryan Reo’s co-conspirators have violated numerous laws (U.S.C. § 241 and 242 and mail & wire-fraud laws) and that this Court has original jurisdiction under U.S.C. § 512(f) and under 42 U.S.C. § 1983, 1985 for this matter to proceed to trial upon discovery of all the co-counter-defendants including corporate ones with deep pockets. Pastor Lindstedt sees farming this case out to the attorneys for the Electronic Freedom Foundation and others who hate the DMCA for its corporate media bias and letting them keep most of the attorneys’ fees while overseeing that this case proceeds according to Aryan Christian Israelite principles in conformity to YHWH’s Law. Bryan Reo and Reo’s co-conspirators need to go to prison as well. Looking at the docket sheet, it would seem that Bryan Reo and Reo’s co-conspirators are still listed as Counter-Defendants and this case is still listed as an “820 Copyright” action. Which is exactly what it is. This Rule 59(e) Motion seeks to either have this Court bring this ongoing litigation under copyright action jurisdiction back onto the rails, or have the 8th Circuit clear the matter up. “Clearing the matter up” would involve having Pastor Lindstedt and Lindstedt’s Church as Plaintiffs and Bryan Reo and Reo’s co-conspirator counter-defendants as mere defendants facing the full legal civil and criminal charges arising from their violations of the DMCA(U.S.C. § 512(f)), 42 U.S.C. § 1983, 1985 and 18 USC § 241 & 242, and using Bryan Reo’s fraud and lies already before this Court as evidence in said litigation.

This Court’s Background, Standard, and Discussion

This Court has 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.”

This Court thus admits that Plaintiff *in fraud* / Counter-Defendant Bryan Reo has submitted a bogus and fraudulent lawsuit before the U.S District Court of the Northern District of Ohio and after that case was flushed to the Western District of Missouri that this Court has finally admitted to enabling Bryan Reo to put the future and assets and inheritance of Pastor Lindstedt and Pastor Lindstedt’s Church under siege and for well over a year. This Court direly

informed both Bryan Reo and Pastor Lindstedt at the Feb. 13th Scheduling Conference that if this particular U.S. Magistrate Judge (who used to be a US Attorney for the Western District of Missouri) found that there was unlawful conduct by either Bryan Reo or Pastor Lindstedt that his friends at the US Attorney's office would be notified for criminal prosecution.

However, rather than "standing and delivering" on this threat, this Court has seen fit to let Bryan Reo and Reo's co-conspirator counter-defendants get away with criminal activity and fraud perpetuated upon this very Court while whining that Pastor Lindstedt and Lindstedt's Church haven't jumped through the appropriate hoops of pleading in bringing forward the facts that Bryan Reo and Reo's co-conspirators never had a case under the DMCA, but had abused the DMCA in order to censor and silence Pastor Lindstedt and Lindstedt's Church, while trying to collect \$10.75 million through fraud and deceit in using a federal regime court to violate the very hollow moral foundations of this Mighty Evil Empire's pretend paper Constitution and laws.

Furthermore, this Court now has enabled Bryan Reo to file before the Lake County Circuit Court in Reo's home county 900 miles away from Pastor Lindstedt and Headquarters for Lindstedt's Church a harassing lawsuit based upon the very same blather that this Court found doubtful that it was ". . . either presented in good faith or substantiated." ORDER p3.

However, even Bryan Reo, in his Response to this Court's ORDER to Show Cause on August 24, 2015 on pages five and six asks that this Court remand this case to the Lake County Circuit Court to be Case #27 of the 28 cases in which Bryan Reo as a "vexatious litigant" is now trying to somehow make much the same allegations without proof. (This Court should "remember" how at the Scheduling Conference Bryan Reo asked that this Court declare Pastor Lindstedt a "vexatious litigant" back when the Reo lawsuits numbered less than 20 or so. Also, in the reams of bogus and fraudulent motions made by Reo there was at least one or two which yammered something about Pastor Lindstedt being a "vexatious litigant" somewhere.)

Exhibit #1 concerns the current lawsuit brought by Bryan Reo filed on Sept. 18, 2015 against Pastor Lindstedt. It contains the same whining about the contents of Pastor Lindstedt's and Lindstedt's Church's web pages absent any proof and demanding that the Lake County Circuit Court preemptively institute a finding of guilt against Pastor Lindstedt and censor by means of a gag order whatever Bryan Reo finds objectionable. The wages of criminal activity and losing in two federal district courts is for Bryan Reo to try to censor the Internet against Pastor Lindstedt in his own county district court. This federal court refused to implement a "gag order" against Pastor Lindstedt and Lindstedt's Church web pages, but obviously is going to

allow Reo's criminal activity to go local now that this Court refuses to act upon violations of DMCA (U.S.C. § 512(f)), 42 U.S.C. § 1983, 1985 and 18 USC § 241 & 242 by Bryan Reo and Reo's co-conspirator counter-defendants against Pastor Lindstedt and Pastor Lindstedt's Church.

Exhibit #2 consists of Document 9-1 (Exhibit #1 of Pastor Lindstedt's Initial Answer of Nov. 20, 2014) page 9 of 10 dated August 25, 2014, soon after this Court decided to allow Bryan Reo to proceed *in forma pauperis* on this very litigation that this Court finally figured out was frivolous, malicious and absent any valid DMCA or any other jurisdiction. In this Exhibit #2 there is a gloating by Bryan Reo to Reo's co-conspirators that the purpose of this litigation by Reo was to enrich himself and to use this Court to ". . . deliver all of his property, all of his wealth, all of his land, all of his assets, all of his money, to me, and leave him desolate and penniless." Not that anyone else's life, liberty or property are safe from Bryan Reo's vicious Satannic evil: . . . "from various foes, \$240,000" was to be stolen under color of "law" and Bryan Reo's legal process. Then Bryan Reo was suing Arbitron and the National Rifle Association. However, only Pastor Lindstedt was "the wicked one" who "was the biggest threat to Christian Identity" and to be defrauded of \$10.75 million but "worth [at least] \$500,000 just by itself."

In a separate Affidavit Pastor Lindstedt will provide a thorough recounting of Bryan Reo's and Reo's co-conspirator's known fraud and criminal conspiring to violate .the DMCA (U.S.C. § 512(f)), 42 U.S.C. § 1983, 1985 and 18 USC § 241 & 242. This shall be done as a criminal complaint to the U.S. District Attorneys for both the Western District of Missouri and the Northern District of Ohio, but also the Sheriff of Lake County, the Attorney General of Ohio, and sundry past and present victims of Bryan Reo, who shows signs of "going Mercer."

However, this Court now possesses sufficient information as well as the subject jurisdiction to Alter or Amend its ORDER of Sept. 10, 2015, and to allow this case to proceed to trial with Pastor Lindstedt and Pastor Lindstedt's Church being the Plaintiffs, Bryan Reo and Reo's co-conspirators and counter-defendants becoming the Defendants. This will necessitate allowing further amending of Pastor Martin Lindstedt's Counter-Complaint and a new Scheduling Order by this Court to enable discovery and bringing this case to jury trial. This Court also has the jurisdiction (and duty) to remand this case away from the Lake County Ohio circuit court. This Court also has the jurisdiction (and duty) to notify the U.S. Attorneys of both the Western District of Missouri and the Northern District of Ohio as to Bryan Reo and Reo's co-conspirators criminal violations of DMCA (U.S.C. § 512(f)), 42 U.S.C. § 1983, 1985 and 18 USC § 241 & 242. Time for this Court's hollow threats to Reo to be implemented.

Bryan Reo and Reo's co-conspirators / co-defendants have been found by this Court to have no jurisdiction given that they have been engaged in a criminal conspiracy to censor Pastor Lindstedt and Lindstedt's Church. Therefore Bryan Reo should be assessed the \$400 docket fee and the \$654.40 for service by US Marshal's Service for a total of \$1,054.40. If necessary Pastor Lindstedt and Lindstedt's Church will pay the \$400 docket fee as Plaintiffs for this case to proceed to trial by jury against Bryan Reo and Bryan Reo's co-conspirator co-defendants. Bryan Reo's case should be dismissed and costs assessed against Bryan Reo. An injunction should also be granted to prevent Bryan Reo from making further baseless complaints against Pastor Lindstedt and Lindstedt's Church assets and others until this litigation be completed.

Doing things this way will make for judicial economy given that Bryan Reo's bogus litigation already testifies against himself and Reo's co-conspirators. There is no valid reason for this case to begin anew at the beginning in this or any other jurisdiction.

Five years ago, Pastor Lindstedt found out Bryan Reo's true identity. This identity of this evil one along with its co-conspirators who did trouble Christian Israel was made clearly to all who would listen and without fear or guile. This resulted in temporary censorship, but Pastor Lindstedt and Lindstedt's Church continued. Since Reo's entire case was based upon fraud yet Reo bore the burden of proof, it was decided to simply let Reo lie until this Court had had enough. Soon will be the time for free-speech lawyers to pick the meat from this malicious imp's carcass. There can be no further censorship or silencing. There can be no further censorship with the connivance of this Court and this regime until Civil War is at the door.

Hail Victory!!!

Martin Lindstedt Pastor CTCC LAN R

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, Reo's Lake County Ohio 24 cases,

Exhibit #2. Document 9-1 page 9 of 10 filed Nov. 20, 2014 showing Bryan Reo's criminal intent with others to defraud under color of law Pastor Martin Lindstedt and Lindstedt's Church.

Certificate of Service

Pastor Martin Lindstedt certifies that he mailed a copy of this answer plus exhibits on Wednesday October 7, 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