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CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

BRYAN ANTHONY REO  
7143 Rippling Brook Lane  
Mentor, Ohio 44060

Plaintiff,

v.

MARTIN LINDSTEDT  
338 Rabbit Track Road  
Granby, Missouri 64844

Defendant.

Case No. **1:14 CV 816**

COMPLAINT (Cyber-stalking, harassment,  
defamation, libel, intentional infliction of  
emotional distress, online impersonation,  
digital millennium copyright act)

**JUDGE GWIN**

**CIVIL COMPLAINT**

BRYAN ANTHONY REO (Plaintiff), alleges the following against Martin Lindstedt (Defendant):

**INTRODUCTION**

1. Plaintiff's Complaint is based on the Digital Millennium Copyright Act [17 USC 512], the doctrine of defamation, libel, intentional infliction of emotional distress, and defamation via online impersonation and cyber-stalking.

### **JURISDICTION AND VENUE**

2. Jurisdiction of this Court arises due Federal Question jurisdiction over the DMCA claim. Additionally, this Court may exercise jurisdiction over the other claims, and jurisdiction exists due to the total diversity of both parties and the amount in controversy.
3. Because Defendant communicates libelous material into Ohio and sends electronic communications to a resident of Ohio, and has committed substantial injuries against a resident of Ohio, personal jurisdiction is established.
4. Because the injuries have occurred in Northeastern Ohio, subject matter jurisdiction is established.
5. Venue is proper as this is the area in which the injuries occurred to Plaintiff.

### **PARTIES**

6. Plaintiff is a natural person who resides in Mentor, Lake County, Ohio and is being defamed, cyber-stalked, and impersonated online by Defendant. Plaintiff has no criminal record and has never received so much as a parking or traffic citation and is particularly distressed to be declared a murderer and an insurance fraudster by Defendant.
7. Defendant is a natural person residing in Granby, Newton County, Missouri, who has previously spent approximately three and one-half years in the Fulton State Mental Hospital for allegedly sodomizing his grandson. Defendant apparently also spent 660 days in jail on 30 consecutive contempt of court charges.
8. Defendant claims to be the “arch-bishop” of the “Church of Jesus Christ Christian-Aryan Nations of Missouri,” which he declares is a 501(c)3 tax-exempt religious

organization incorporated in Missouri. Plaintiff has been unable to find any evidence that articles of incorporation or documents for tax-exempt religious organization were ever filed by Defendant. That aside, Plaintiff is pursuing Defendant solely in his capacity as a private individual and is not interested in pursuing an action against a fictional cult church that does not actually exist.

9. Defendant is engaged in cyber-stalking, defaming, and impersonating Plaintiff on the internet.

#### **FACTUAL ALLEGATIONS**

10. Plaintiff had the misfortune of coming into contact with Defendant in early 2010 when Defendant was invited into a lively online Skype conference chat call where the topics of discussion ranged from hunting and camping, to target shooting, to outdoor activities, to current events.
11. Defendant was invited into the chat conference by one of the other participants in the chat conference. Defendant rapidly began to engage in incoherent ranting and made disparaging remarks, declaring that he had “followers” and that they were going to castrate police officers, judges, and politicians, and murder the children of same. Plaintiff was concerned by these bizarre and absurd remarks and gently suggested that Defendant could benefit from professional mental health assistance. Defendant promptly exploded on Plaintiff and dedicated himself to discovering the real-life identity of Plaintiff’s screen-name.

12. Approximately six months later, in October 2010, Defendant discovered Plaintiff's identity and began a relentless campaign of harassment, posting pictures of Plaintiff on pornographic forums, posting Plaintiff's phone number on adult websites, using Plaintiff's full [real] name and Plaintiff's picture to create accounts on forums and post writings in favor of non-mainstream causes such as NAMBLA.
13. Defendant has repeatedly declared that Plaintiff would "one day be found dead in a dumpster" [a police report of Plaintiff's criminal complaint about Defendant's threats and conduct towards Plaintiff is on file with the Lake County Sheriff's Department in Lake County Ohio] and has declared that he [Defendant], despite having been involuntarily institutionalized for 3.5 years in a mental hospital in Missouri, has firearms and will use said firearms in the event that the police ever attempt to take him back to the mental hospital.
14. Defendant has also declared that he and his "followers" know how to make weaponized anthrax and that they will poison the water supply in Southwestern Missouri if Defendant is incarcerated. The remarks about Anthrax were made while Defendant was incarcerated in 2005 in jail in southwestern Missouri. While in jail Lindstedt penned a 20+ page paper [which was previously available on his website, a PDF of which Plaintiff has saved] wherein he outlines that he and his "followers" will attack the government and "force police and judges to bite the testicles off of their own children." The Plaintiff may wish to have the letter in question entered into evidence so that the Court may get an impression of the Defendant's mental status and to help them in deciding whether or not to have Defendant held for psychiatric review.

15. Defendant recently [in the last 18 months] created an account on his hate-filled website, under Plaintiff's name, and posted things where he purports to declare that Plaintiff is a homosexual, Plaintiff is a drug dealer, Plaintiff is a con-man, Plaintiff is a murderer, Plaintiff engages in insurance fraud, Plaintiff is a pawn store owner, Plaintiff is a "Jewish pimp," Plaintiff is a "mamzer baal-priest," and other defamatory things.
16. Defendant insults and denigrates Plaintiff's heritage and Defendant's perception of Plaintiff's heritage.
17. Defendant makes contradictory and bizarre allegations that Plaintiff is a "Mexican mestizo," a "Jewish pimp," an "Italian-Arab nigger" and a "white supremacist" none of which are consistent or valid. At varying times Defendant has accused Plaintiff of being a "communist," a "fascist," a "nazi," and an "anarchist" the contradictory nature of such accusations provides insight into the mentally ill mind of the Defendant.
18. Defendant makes specific references to a man in South Carolina, who shares Plaintiff's name [first and last], who apparently was the at-fault party in a fatal car collision in South Carolina, and Defendant declares that Plaintiff is the man being discussed in the article [see attached Exhibit 1 and Exhibit 2]. Defendant declares that Plaintiff purposefully staged an auto-mobile accident in South Carolina, murdered a woman, and did so for the purpose of insurance fraud. Plaintiff wishes this Court to note that as an adult Plaintiff has never been in South Carolina and has never driven a vehicle in South Carolina.
19. Defendant has conducted a relentless and ruthless campaign of harassment and libel against Plaintiff. Plaintiff has made terms of service violation complaints on at least eight occasions with separate website server hosting companies, complaints which have always resulted in the prompt termination of Defendant's website services. However the

Defendant simply switches to a different company and continues his libel, his impersonation, and his cyber-stalking.

20. Defendant has posted online [falsely] that Plaintiff has syphilis and other infectious venereal diseases [see attached Exhibits 3, 4, 5, and 6]. Additionally, Defendant has made the posts about Plaintiff [falsely] having syphilis in the name of the Plaintiff, signing Plaintiff's names to the posts and attaching Plaintiff's picture to the post.
21. Defendant has posted defamatory content about Plaintiff on at least a half-dozen websites, although Plaintiff has since had most of the content removed by filing terms of service violation complaints and [where appropriate- such as issues involving pictures of Plaintiff that Plaintiff owns and has an exclusive claim on] DMCA complaints.
22. On 7<sup>th</sup> December 2010 Defendant wrote a forum post [attached Exhibit 7] in which he declared that he knew where Plaintiff lives and that retribution was going to come down upon Plaintiff and that Plaintiff would be destroyed without mercy. Defendant also threatened to do violence against a sheriff's deputy in his [Defendant's] home county of Newton Missouri.
23. The Defendant has shown that his use of the internet is solely for the purpose of harassment, bullying, stalking, libeling, defaming, and impersonating decent people.
24. Plaintiff's name appears on the Defendant's vile website no less than 525 times. It is clear that one of the major purposes of Defendant's website is to libel and injure the Plaintiff.
25. Plaintiff has suffered extreme anxiety as a result of Defendant's conduct and has had the embarrassing misfortune of having to explain to others that Plaintiff has no connection to Defendant and does not in any way, shape, or form, support his "Aryan Church" or anything remotely connected with his cult.

26. Defendant has stolen one of Plaintiff's pictures from Plaintiff's Facebook account, where not only is Plaintiff the individual pictured, but Plaintiff was the photographer as Plaintiff shot his own picture. Thus Plaintiff is the only possible individual with a claim [indeed an exclusive claim] to the picture, as Plaintiff is the subject of the picture and the photographer. Defendant has stolen and infringed on Plaintiff's claim to the picture in question. The most recent infringement occurred on or around 6<sup>th</sup> April 2014. The infringement is associated with the account Defendant made in an attempt to impersonate Plaintiff [a forum user avatar picture] and thus the infringed picture appears repeatedly on Defendant's website, anywhere he makes a post with the impersonating account.

<http://whitenationalist.org/forum/member.php?u=20207>

<http://whitenationalist.org/forum/showthread.php?p=10447#post10447>

27. Defendant has since moved his website/defamation/infringement activities to another one of his numerous websites, at the following links:

<http://christian-identity.net/forum/showthread.php?t=892&page=6>

<http://christian-identity.net/forum/showpost.php?p=10458&postcount=53>

28. In March of 2011 Defendant obtained a Lexis Nexis report on Plaintiff, containing information such as voter registration, party affiliation, vehicle registration, vehicle license plate, social security number, etc, and posted it on numerous websites [including his own at the time] and thus intruded on the seclusion of Plaintiff. A copy of what Defendant posted is attached as Exhibit 8, Exhibit 9, Exhibit 10, Exhibit 11, and Exhibit 12.

29. Plaintiff made a DMCA complaint with Defendant's former website service provider, Crisis Host, on 7<sup>th</sup> April 2014. Defendant supposedly made a counter-notice on 8<sup>th</sup> April

2014, although the website service provider never sent a copy to Plaintiff. However, Defendant did send, by email, a copy of what he purported was a DMCA counter-notice [which he claimed had been sent to the service provider] to Plaintiff on 8<sup>th</sup> April 2014. The website service provider has been unable to verify that Defendant submitted a counter-notice to them as provided by the DMCA.

**COUNT I**  
**DEFENDANT HAS DEFAMED AND LIBELED PLAINTIFF**

30. Defendant has defamed and libeled Plaintiff based on the following:

- a. Defendant has communicated accusations and allegations against and about Plaintiff, all of which are not only untrue but are overwhelming untrue.
- b. Defendant has made these communications in writing, verbally over internet talk radio programs, on the phone, on the websites of others, and [primarily] on the website he controls.
- c. Defendant's relentless campaign of libel against Plaintiff has caused Plaintiff professional and career problems.
- d. Defendant's brutal defamation has caused Plaintiff emotional distress.

**COUNT II**  
**DEFENDANT HAS CYBER-STALKED PLAINTIFF**

31. Defendant has cyber-stalked Plaintiff based on the following:

- a. Defendant has stalked Plaintiff throughout the internet, making it a point to regularly google Plaintiff's name so as to highlight the current activities of the



Plaintiff while casting them in a false light. For instance, in 2011 Plaintiff sued a debt collection firm which repeatedly violated the FDCPA [in regards to repeatedly calling about a third party debt] and Plaintiff filed suit to enforce his rights under the law. Defendant has posted the basic information on the case, the name, the case number, the final disposition, and has declared that it is somehow “evidence” that Plaintiff is “a dead-beat Jew” who “does not pay his bills.”

- b. The post in question, regarding the FDCPA case that was cast in a false light by the Defendant can be found attached as Exhibit 3.

**COUNT III**  
**DEFENDANT INTENTIONALLY INFLICTED EMOTIONAL DISTRESS ON**  
**PLAINTIFF**

32. Defendant has intentionally inflicted emotional distress upon Plaintiff based on the following:

- a. Defendant has bragged that he hopes he pushes Plaintiff to suicide through his campaign of libel and defamation.
- b. Defendant has also boasted that he hopes somebody kills Plaintiff based on the [false] defamatory information that Defendant communicates and disseminates in regards to Plaintiff.
- c. Defendant publishes/published Plaintiff’s home address, picture, and phone number in the hopes that somebody will harm Plaintiff.
- d. Defendant has conducted a calculated, brutal, and relentless campaign of harassment against Plaintiff.
- e. Defendant’s conduct against Plaintiff is outrageous and beyond the pale, it would be unacceptable and beyond outrageous in any civilized society.

- f. The distress caused by the outrageous conduct is such that no reasonable individual could be expected to bear it.
- g. Defendant's conduct has been the proximate cause of Plaintiff's emotional distress.

**COUNT IV**  
**DEFENDANT IMPERSONATED PLAINTIFF ONLINE FOR PURPOSES OF**  
**DEFAMATION AND INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

33. Defendant has impersonate Plaintiff based on the following:

- a. Defendant has posted numerous posts on his [Defendant's] website under the name of the Plaintiff with a stolen [copyright infringed] picture of the Plaintiff [stolen from Plaintiff's facebook page] as the avatar, so it appears to the casual web-surfer that the post is being made by Plaintiff.
- b. Defendant has posted outlandish things signing the name of the Plaintiff to them, things such as allegations that Plaintiff has syphilis.
- c. The conduct perpetrated by Defendant while impersonating the Plaintiff is vile, contemptible, and outrageous beyond the pale.
- d. If Defendant were impersonating Plaintiff in person, going up to individuals in the community and identifying himself as Plaintiff, there would be instant remedies available and it would be a criminal offense. This Court has the authority to use its discretion to punish the Defendant for his online impersonation of Plaintiff.

**COUNT V**  
**DEFENDANT VIOLATED THE DIGITAL MILLENNIUM COPYRIGHT ACT**

34. Defendant has violated the DMCA based on the following:

- a. Defendant has stolen numerous pictures from Plaintiff where Plaintiff is the only person pictured and is often the photographer as well and thus Plaintiff is the only possible person with a claim [indeed exclusive claim] and Defendant has placed these stolen and infringing pictures throughout his website.
- b. Plaintiff's pictures were never made available with a release to the public domain and were not posted with any such terms.
- c. Plaintiff has never given Defendant permission to use any of Plaintiff's pictures in any context.

**COUNT VI**  
**DEFENDANT INTRUDED ON THE SECLUSION OF PLAINTIFF**

35. Defendant has intruded on the seclusion of Plaintiff based on the following:

- d. Defendant published a Lexis Nexis report on Plaintiff in 2011, circulating information about Plaintiff, his vehicle license plate, vehicle registration, voter registration, party affiliation, social security number, etc.
- e. Defendant's conduct caused Plaintiff extreme emotional distress and anguish.
- f. Defendant intruded on Plaintiff's seclusion such that his conduct was intentional, outrageous, and it was the proximate cause of Plaintiff suffering extreme emotional distress beyond the pale.

WHEREFORE, Plaintiff, BRYAN ANTHONY REO respectfully requests judgment be entered against Defendant Martin Lindstedt. for the following:

36. Actual damages of \$100,000.00 dollars as they relate to damage to Plaintiff's reputation.
37. Emotional damages of \$500,000.00 dollars.
38. Punitive damages of \$10,000,000.00 dollars.
39. Statutory damages of \$150,000.00 dollars pursuant to the DMCA.
40. Injunctive relief against Defendant ever being allowed to use the internet, to own or operate a website, to post on a forum, or to submit content for posting online through any third party. There is nothing radical with this requested relief, hackers and others who abused their internet privileges have found themselves subjected to court orders prohibiting them from using the internet or even owning a touch-tone phone. Defendant Lindstedt should be prohibited from ever being allowed on the internet again.
41. Injunctive relief against Defendant ever being allowed to own, borrow, lease, use, or attempt to use, a computer. Defendant [who was recently released from the state mental asylum in Missouri] has not been gainfully employed for at least two decades and would suffer no career damage by being prohibited from having a computer.
42. That Defendant be subjected to court mandated psychiatric review as he clearly poses a substantial risk to himself and others, particularly those in his immediate community. Even with all that the Defendant has done to harm Plaintiff, Plaintiff cannot help but feel sorry for the Defendant because he truly is a mentally ill man who obviously needs professional medical and psychiatric help. It would be in Defendant's own best interests that he be returned to the Fulton State Mental Hospital until such time that he is deemed cured and can resume his place in society as a productive and healthy member of society.

The Court has the authority to initiate proceedings for psychiatric review pursuant to Ohio Revised Code 5122.11 and 5122.10 as well as Missouri Statute 632.305(1). At the present this Court has an opportunity to not only help a Plaintiff who is being vehemently defamed and stalked by a mentally ill man, but to also help the mentally ill man get the help that he desperately needs. Plaintiff would be content to receive no punitive damages as long as injunctions and restraining orders were granted and Defendant was held for review to get the help he clearly needs before he hurts himself or others.

43. A permanent restraining order against Defendant ever being able to contact Plaintiff in any capacity, to impersonate Plaintiff, to represent himself as Plaintiff [be it electronically or in person] to any other individual for any purpose whatsoever, and a permanent restraining order against Defendant using any computer for any purpose.
44. That Defendant be adjudicated incompetent/mentally ill and be prohibited from purchasing, possessing, using, or carrying a firearm.
45. That all websites presently owned, operated, or administered by Defendant be transferred to Plaintiff's ownership/control so that all defamatory content can be removed for all time and so that the Defendant cannot attempt to revive the content on the sites in question [Plaintiff intends to permanently delete everything that Defendant has ever posted on any website presently owned by Defendant and then maintain ownership of the websites so that no content can ever be posted at any of the addresses/sites presently owned and used by Defendant]
46. That any interest that Defendant has in any website/forum shall be transferred to Plaintiff.

47. Any applicable legal fees, filing fees, court costs, and other associated fees that Plaintiff may incur from bringing forth and conducting this complaint.

48. Any other relief that this Honorable Court deems appropriate.

**DEMAND FOR BENCH TRIAL**

Plaintiff, BRYAN ANTHONY REO, requests a bench trial in this case.

RESPECTFULLY SUBMITTED,

*Bryan Reo* 4/16/2014

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