

**Matthew D. Hardin (pro hac vice)**  
**HARDIN LAW OFFICE**  
101 Rainbow Drive # 11506  
Livingston, TX 77399  
Telephone: (202) 802-1948  
Email: MatthewDHardin@gmail.com  
*Attorney for Defendants*  
*Joshua Moon and Lolcow, LLC*

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THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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<p>RUSSELL GREER,  Plaintiff,  v.  JOSHUA MOON, <i>et al.</i>  Defendants.</p>	<p><b>DEFENDANTS’ NOTICE OF SUPPLEMENTAL AUTHORITY REGARDING MOTION TO REVIEW IN FORMA PAUPERIS STATUS</b></p> <p>Case No. 2:24-cv-00421-DBB</p> <p>District Judge David Barlow Magistrate Judge Jared C. Bennett</p>
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NOW COME the Defendants, by and through their undersigned counsel, and advise the Court that recently-discovered evidence further supports Defendants’ Motion to Review Mr. Greer’s *In Forma Pauperis* Status. ECF No. 253.

The attached CAD Report, obtained by Defendants on March 31, 2025, reveals that Mr. Greer represented to the Nye County, Nevada Sheriff’s Department on November 22, 2024, that he had significant financial resources, which he appears not to have disclosed to this Court. Specifically, Mr. Greer told the Nye County Sheriff “I run an LLC in Nevada that wanted to purchase the Cherry Patch: the rustic building with the female statue in Crystal... I actually had written [the owner] directly and her representatives for a year, trying to convince her to sell.” Exhibit A at 2. Mr. Greer thus appears to have told law enforcement that from at least 2023 to 2024, Plaintiff was

attempting, on behalf of an LLC that he “runs,” to purchase a substantial piece of real property, and a statue, in Nye County, Nevada. Public news reports indicate that the “Cherry Patch Ranch,” which is a former Nevada brothel described in Mr. Greer’s report to the Nye County, Nevada Sheriff, was listed for sale at \$1,200,000.00. Amy Walters and Laura Sharman, The Telegraph, *Infamous brothel on market for £900,000 with old mattresses and raunchy outfits*, <https://www.mirror.co.uk/news/us-news/infamous-brothel-market-900000-old-26525005> (March 22, 2022).

Although Mr. Greer’s request for *in forma pauperis* status remains under seal and Defendants have not been able to review it, Defendants assert upon information and belief that Mr. Greer did not reveal to this Court when he applied for *in forma pauperis* status, or at any point thereafter, that he has a controlling interest in a Nevada LLC with sufficient resources to make purchases of real estate and artwork valued at over a million dollars. Presumably, if Mr. Greer had revealed his financial wherewithal was sufficient to purchase a property listed for sale at over a million dollars, this Court would have denied his request for *in forma pauperis* status under DUCivR 3-2.

WHEREFORE, Defendants respectfully submit that this Court should review Mr. Greer’s current financial status and hold that Plaintiff is not entitled to proceed as a pauper.

DATED March 31, 2025

**HARDIN LAW OFFICE**

*/s/ Matthew D. Hardin*

**Matthew D. Hardin**

Attorney for Defendants Joshua Moon  
and Lolcow, LLC



03/31/25  
13:56

Nye County Sheriffs Office  
CALL DETAIL REPORT

4229  
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Call Number: 24NY69172

Nature: FRAUD NY  
Reported: 16:15:04 11/22/24  
Rcvd By: McFarland E L How Rcvd: E  
Occ Btwn: 16:15:04 11/22/24 and 16:40:51 11/22/24  
Type: 1  
Priority: 4

Address: CHERRY PATCH; PHONECALL  
City: CRYSTAL

Alarm:

Lic Info: NV

Clearance: UCC

COMPLAINANT/CONTACT

Complainant: , Name#:   
Race: Sex: DOB: \*\*/\*\*/\*\*   
Address: ,   
Home Phone: Work Phone:

Contact: RUSSELL GREER  
Address:  
Phone:

RADIO LOG

Dispatcher	Time/Date	Unit	Code	Zone	Agnc	Description
Sproul K M	17:00:36 11/22/24	NYS12	ASSG	NYAM	NYSO	Assigned to a Call call=13531
Finlayson	17:22:55 11/22/24	NYS12	ENRT	NYAM	NYSO	(MDC) Enroute to a call call=13531
Huggins M	17:31:22 11/22/24	NYS12	CMPL	NYAM	NYSO	Completed Call call=13531

COMMENTS

16:29:44 11/22/2024 - McFarland E L  
A File A Report form has been submitted through the app.  
Type: - Reporting party currently outside the county I have already spoken with a deputy about this incident and they referred me to complete an online report.  
- No If you did, which deputy did you speak with? - empty I verify I am reporting an incident and/or criminal offense that occurred within Nye County, Nevada. - True Choose one: - I am the victim filling this report.  
First name - Russell  
Middle name - G  
Last name - Greer  
Street Address -  
City - Las Vegas  
State - NV  
ZIP Code - 89169  
Is your mailing address different than above? - No Date of Birth -  
2024-11-22T22:58:48.082Z Race - White Gender - Male License Number and State -

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Nye County Sheriffs Office  
CALL DETAIL REPORT

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N/A Phone Number -                      Email Address -                      Date &  
Time of Offense - 2024-11-22T22:58:48.082Z Location of Offense - 100 Appaloosa  
Way, Crystal, NV 89060 Property Information & Value - Former brothel Please  
select one in regard to Suspect Information. - I can provide personal info or  
some info.  
Are there witnesses? - Yes  
If yes, provide witness name and contact information. - News Media was there.  
Please pick one in regard to the narrative of the criminal offense/incident. - I  
can provide personal info or some info.  
Summary - I am seeking to file a police report against Jan Jensen and would ask  
for charges to be brought against her under NRS 205.380 (obtaining money,  
property or labor under false pretenses).

Jan Jensen is the owner of the two brothels she just had demolished in the  
Crystal, NV area.

Jan deceived the previous owners and hid the fact that she is strictly against  
prostitution. Dennis Hof previously owned the properties and there is no way he  
would have let them be bull dozed, even for a one million dollar purchase. When  
Dennis died in 2018, he let the properties shift to his successor Suzette.  
Suzette sold the brothels in 2022 and I dont believe she knew of Jans hatred  
towards sex work.

Therefore, Jan purchased the property under false pretenses. Under the statute,  
false pretenses are a representation of some fact or circumstance which is not  
true and is calculated to mislead; it may consist of any words or actions  
intended to deceive. Buckner v. State, 95 Nev. 117, 590 P.2d 628 (1979).

I am directly harmed by Jans fraudulent purchase of the property and subsequent  
bulldozing them because I run an LLC in Nevada that wanted to purchase the  
Cherry Patch: the rustic building with the female statue in Crystal.

I actually had written Jan directly and her representatives for a year, trying  
to convince her to sell.

Those were historic buildings that nobody can ever operate because some crazy  
woman LIED to obtain them for the sole purpose of demolishing them.

Here is the news article covering the event:  
[https://pvtimes.com/news/crystals-historic-love-ranch-brothel-demolished-137582/  
?utm\\_campaign=widget&utm\\_medium=most\\_read](https://pvtimes.com/news/crystals-historic-love-ranch-brothel-demolished-137582/?utm_campaign=widget&utm_medium=most_read)

I firmly believe under penalty of perjury that Jan lied to obtain the property.  
A trial would have to be held to get all the facts, but prima facie, a crime was  
indeed committed.

The facts are clear that Jan lied to obtain property. I have legal standing to  
file this police report, I am harmed as a person who wanted to run the brothel  
and I am requesting a report be filed so the county attorney can press charges  
against Jan.

Your full legal name - Russell Godfrey Greer Digital Signature: I affirm and  
agree. - True

16:31:06 11/22/2024 - Johnson L

Address change from CRYSTAL; NYE ; PHONECALL to CHERRY PATCH; PHONECALL

16:57:22 11/22/2024 - McFarland E L

Q: What exactly has happened

A: Uncertain

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13:56

Nye County Sheriffs Office  
CALL DETAIL REPORT

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Q: How did you become aware of the theft?

A: Uncertain

17:28:40 11/22/2024 - Finlayson N

CALLING RP, GOOGLE VOICE NUMBER.

17:29:19 11/22/2024 - Finlayson N

LEFT VM

17:30:37 11/22/2024 - Finlayson N

CALLED 3X NO ANS, REOPEN IF RP CALLS BACK

UNIT HISTORY

Unit	Time/Date	Code
NYS12	17:00:36 11/22/24	ASSG
NYS12	17:22:55 11/22/24	ENRT
NYS12	17:31:22 11/22/24	CMPL

RESPONDING OFFICERS

Unit	Officer
NYS12	Finlayson N