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Joshua Moon and Lolcow, LLC

THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

<p>RUSSELL GREER, Plaintiff, v. JOSHUA MOON, <i>et al.</i> Defendants.</p>	<p>DEFENDANTS' MOTION FOR NATALIE BANKS TO PROCEED UNDER A PSEUDONYM</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 Defendants, Joshua Moon and Lolcow, LLC, by and through their undersigned counsel, and file this Motion for Natalie Banks to Proceed Under a Pseudonym.

I. Introduction

As Russell Greer has now disclosed in his own filings, ECF No. 394, Defendants have recently disclosed the existence of a witness who uses a pseudonym. That pseudonym is Natalie Banks. Defendants do not know Ms. Banks' legal name or physical address, and they do not want to know, because it would very likely expose Ms. Banks to danger if her real name and address were published.¹ Thus, Defendants file this

¹ This Motion therefore does not seek to place Defendants in any position of informational advantage over Mr. Greer. Defendants do not have any information they seek to withhold regarding the true identity or contact information for Ms. Banks.

Motion seeking leave to proceed in this case by using Ms. Banks' pseudonym in all instances, including disclosures to Mr. Greer and in any future instance where Ms. Banks' testimony may be needed (to include declarations, depositions, and at trial).

Ms. Banks is presently in Ohio, but is or recently was a sex worker at legal brothels in Nevada. She uses her pseudonym on her Nevada business license due to the inherent risks of that profession, and has been careful to ensure her legal name and address does not become public. She is publicly known as Natalie Banks, including on at least some legal documents filed with the State of Nevada and its subdivisions. Ms. Banks is personally familiar with Mr. Greer, due to extensive contacts with him beginning in approximately late 2022 through 2024. On counsel's request, she has now provided undersigned counsel with her communications with Mr. Greer. This followed an extensive discussion with undersigned counsel via phone and email. Ms. Banks' story and supporting documentary evidence is both highly relevant to this case² and truly frightening: Ms. Banks personally knows one Nevada sex worker who is the beneficiary of a protective order against Mr. Greer, and is aware of Mr. Greer's financial resources in a manner that indicates Defendants and this court have consistently been defrauded over the course of many years by false claims of poverty.

Mr. Greer emailed Ms. Banks and contacted her via social media over a period of years, demanding a relationship with her. When Ms. Banks blocked Mr. Greer from her

² Beyond merely establishing the character and reputation of the Plaintiff, Ms. Banks is expected to shed light on numerous misrepresentations Ms. Greer made in filings with this Court from approximately 2022 through 2024. Additionally, Ms. Banks is expected to testify on topics bearing upon whether Defendants' alleged republication of copyright material constituted fair use, including but not limited to establishing that republication was a necessary component of criticism of Mr. Greer and part of a vital effort to protect women (including but not limited to Ms. Banks) from Mr. Greer's violent tendencies.

social media accounts, he messaged her anyway. He sent her lewd messages on numerous occasions and even sent her a voice memo to indicate – in his own, inimitable voice – that he was coming to see her and she should “get ready.”

Ms. Banks is not alone in having serious concerns about Mr. Greer and his propensities. On information and belief and based on public records, there are several other protective orders that have been issued to protect women in Utah and Nevada against Mr. Greer’s violent tendencies. Allowing a witness to proceed in a civil case under a pseudonym is not ordinary, but this is not an ordinary case or an ordinary Plaintiff. Defendants have spoken with Ms. Banks and confirmed she is happy to assist in providing information in this matter, but Ms. Banks is understandably very reluctant to divulge her full legal name and address to an individual with a documented history of violent and/or threatening behavior towards women, including herself. This Court should therefore permit Ms. Banks to proceed under a pseudonym.

II. Standard of Review

Pseudonymity is appropriate if disclosure of a true identity or address would result in “exposure of the witness to danger.” *United States v. Smaldone*, 484 F.2d 311, 318 (10th Cir. 1973). In seeking to keep a witness’s identity secret, a party must show that the danger is real rather than speculative. *United States v. Gutierrez de Lopez*, 761 F.3d 1123, 1140 (10th Cir. 2014). But the threat need not come from a party opponent or any particular individual, it simply must be genuine. *Id.* at 1141. Evidence that a threat is genuine may include the witness’s decision to relocate for safety reasons, the witness’s request for anonymity, and any behavior by a litigant that the Court finds might cause a witness apprehension. *Id.*, citing *Smaldone*. “Significant privacy interests, such as... interest in keeping... sexual habits from public scrutiny, sometimes suffice” to show that

proceeding under a pseudonym is appropriate.” *W.N.J. v. Yocom*, 257 F.3d 1171, 1172 (10th Cir. 2001) (internal quotations omitted).

III. Argument

Ms. Banks easily satisfies the relevant tests to proceed under a pseudonym. Mr. Greer has a documented history of harassment towards women that has resulted in at least three restraining orders. Ms. Banks is personally acquainted with one woman (another sex worker) who has received such a restraining order against Mr. Greer, and Ms. Banks herself has been the recipient of persistent communications from Mr. Greer that are lewd and have threatening undertones. Mr. Greer himself has repeatedly cited harassment as a reason to keep witness names secret,³ and his behavior in this matter has made Ms. Banks’ testimony more important than ever while simultaneously establishing a basis for Ms. Banks to be apprehensive about offering that testimony in a way that exposes her legal name. Alternatively, this Court should hold that Natalie Banks is Ms. Banks name under the common law due to her extensive use of that name, and hold that she need not disclose any alternative or prior names to Mr. Greer.

a) Mr. Greer has a documented history of threats towards women, that has resulted in at least three personal restraining orders in two states.

Mr. Greer targets women with harassment or threatening behavior, as at least three courts in two states have already found. *Greer v. Freemantle Productions*, Case No. 2:22-cv-01905 (D. Nev.) at ECF Nos. 32-14 (Extended Order of Personal Protection for the benefit of Murphy Walters), 32-15 (Extended Order of Personal Protection for the benefit of Tara Adkins), and 32-16 (Sentencing Protective Order for the benefit of a

³ See, e.g., ECF No. 185-1, 193, 194, 196, 218.

redacted party). For the Court's convenience, each of these protective orders are attached hereto as collective Exhibit A.

Based on Mr. Greer's documented history of threatening behavior towards women, including three separate protective orders and one criminal charge, there is ample reason to believe that Mr. Greer will threaten, stalk, or harass Ms. Banks if her true identity is disclosed to him.

b) Mr. Greer has a documented history of intimidation towards Ms. Banks and one of the sex workers with whom she is acquainted.

Based on a conversation with Ms. Banks, Defendants state that Ms. Banks is personally acquainted with one of Mr. Greer's victims who obtained a protective order against him, and that victim is a fellow sex worker who was initially targeted by Mr. Greer in that context. Ms. Banks naturally is apprehensive that disclosure of her true name and address will put her in a similar situation to what her colleague has already faced.

But that is not all. Mr. Greer has also personally sexually harassed Ms. Banks through electronic means.⁴ Attached hereto as collective Exhibit B are communications Natalie Banks provided to the Defendants upon their request. In his written communications, Mr. Greer repeatedly contacted Ms. Banks after being blocked. Mr. Greer demanded a relationship with her. Exhibit B at 2, 8. Receiving no response, Mr. Greer continued in insisting that he was "Going to have sex with" Ms. Banks as recently as September 2024, Exhibit B at 28, and sent her a voice memo stating that he was

⁴ Mr. Greer's Utah criminal conviction resulting in a sentencing order of protection also involved computer harassment.

going to do it “next week, so be ready.”⁵ Ms. Banks has personally communicated in writing to undersigned counsel her interpretation of Mr. Greer’s repeated contacts after being blocked, and his repeated demands for sexual congress: According to Ms. Banks, Greer’s communication “implies that I have no choice in the matter.”

Ms. Banks has ample reason to fear that her personal safety will be compromised if her real name and address is revealed to Mr. Greer or the public. Ms. Banks is currently working as an adult dancer and content creator. Her sexual proclivities alone are sufficient to proceed under a pseudonym under *Yocom*, 257 F.3d at 1172. Additionally, Ms. Banks is uniquely vulnerable to attacks and exploitation simply by virtue of her career. Defendants need not prove that Ms. Banks will be put in danger by Mr. Greer himself under *Gutierrez de Lopez*, and danger from any source is sufficient for her to proceed anonymously. *Id.* at 1141. But the evidence is abundant that Mr. Greer’s own behavior would give any witness in Ms. Banks’ situation ample reason to be apprehensive about being identified publicly.

c) Based on Mr. Greer’s well-documented behavior, the appropriate remedy is for Ms. Banks to proceed under a pseudonym.

Mr. Greer knows who Ms. Banks is, although he knows her by her public-facing pseudonym rather than by her true legal name. ECF No. 194. Mr. Greer has communicated with Ms. Banks repeatedly by his own admission, *id.*, and Defendants have provided additional color in the communications attached hereto as collective Exhibit B. Under these circumstances, and under controlling precedent, the proper

⁵ The voice memo cannot be uploaded into the Court’s ECF system, but Defendants proffer here that it is identifiable because Mr. Greer’s voice is unique and easily recognized on the recording. In that voice memo, Mr. Greer laughs after he tells Ms. Banks to “be ready.”

remedy is to allow Ms. Banks to proceed under a pseudonym. Under *Smaldone* and *Gutierrez de Lopez*, Mr. Greer will still be permitted to cross-examine or challenge any evidence that eventually comes in on any pertinent grounds. As Defendants themselves do not know, and do not wish to know, Ms. Banks' true identity, Mr. Greer will not be disadvantaged by her pseudonymity, and all parties will remain on an equal footing.

d) Alternatively, Ms. Banks pseudonym is her legal name under the common law.

In Utah, an individual retains the “common law right to adopt another name at will.” *In re Cruchelow*, 926 P.2d 833, 834 (Utah 1996). An individual may use the statutory process to change their legal name, but is under no legal obligation to do so. *Id.*

Ms. Banks may not have a birth certificate or driver's license that says “Natalie Banks,” but she is commonly known by that name in all her dealings. She has worked as a prostitute in Nevada with all appropriate public-facing legal documentation under that name. She operates a YouTube channel under that name.⁶ She emailed both Mr. Greer and undersigned counsel under that name. Exhibit B. If this Court holds that Ms. Banks may not proceed under a pseudonym, it should alternatively hold that a pseudonym is unnecessary because Ms. Banks is known as Natalie Banks under the common law of this state based on her long and public history of using that monicker.

IV. Conclusion

For the reasons set forth above, this Court should permit Natalie Banks to proceed in this matter using her established pseudonym, which is alternatively her legal

⁶ <https://www.youtube.com/channel/UCnjqMmEPnjPiMN9RvDI7qA>

name under the common law, and should not require her to disclose her legal identity or address to Russell Greer.

DATED December 6, 2025

HARDIN LAW OFFICE

/s/ Matthew D. Hardin

Matthew D. Hardin

Attorney for Defendants

Joshua Moon and Lolcow, LLC



EXHIBIT N
Extended Order for Protection Against
Stalking, Aggravated Stalking, or
Harassment, *Walters v. Greer*, Case No.
RSC2016-000053 (Reno Justice Ct.)

Proof of Service

Case No. RCP 2016-000053

Dept. No. 6

FILED

16 MAR -3 AM 11:49

STEVE TUTTLE
RENO JUSTICE COURT
BY: *[Signature]*
DEPUTY

IN THE JUSTICE COURT OF RENO TOWNSHIP COUNTY OF WASHOE, STATE OF NEVADA

MURPHY WALTERS)

Applicant,))

vs.)

RUSSELL GODFREY GREER)

AKA BRETT R. ROSS)

Adverse Party.

**EXTENDED ORDER FOR
PROTECTION AGAINST
STALKING, AGGRAVATED
STALKING, OR HARASSMENT
(NRS 200.591)**

Date Issued: MARCH 3, 2016

Expiration Date: MARCH 2, 2017

YOU, THE ADVERSE PARTY, ARE HEREBY NOTIFIED THAT ANY INTENTIONAL VIOLATION OF THIS ORDER IS A CRIMINAL VIOLATION and can result in your immediate arrest or issuance of an arrest warrant. Unless a more severe penalty is prescribed by law for the act that constitutes the violation of the order, a violation of an Extended Order for Protection Against Stalking, Aggravated Stalking or Harassment is a category C felony which is punishable by imprisonment in the state prison for not more than five (5) years, and a fine of not more than \$10,000.00.

PURSUANT TO NRS 193.166, if the act that constitutes the violation of a protection order is itself a felony, the violator shall, in addition to the term of imprisonment prescribed by statute for the crime, be punished by imprisonment in the state prison for a minimum term of not less than 1 year and a maximum term of not more than 20 years.

YOU ARE FURTHER NOTIFIED that you **CAN BE ARRESTED** even if the person who obtained the order invites or allows you to contact them. You have the *sole responsibility* to avoid or refrain from violating the terms of this order. Only the Court can change the order upon written application.

WARNING: Possession of a firearm or ammunition while this order is in effect may constitute a felony under federal law punishable by a fine of up to \$250,000 and/or a prison sentence of up to ten (10) years.

This order meets the Full Faith and Credit provisions of the Violence Against Women Act and is enforceable in all 50 states, the District of Columbia, U.S. Territories and Indian Nations. All other Courts and law enforcement with jurisdiction within the United States and all Indian Nations shall give full faith and credit to this order pursuant to 18 U.S.C. Sec. 2265.

Violation of the order may subject you to federal charges and punishment pursuant to 18 U.S.C. Sec. 2261(a)(1) and (2) and 2262(a)(1) and (2).

1 The Court having considered the filings, testimony (if applicable) and evidence
2 presented at hearing, and the Court having found that the Adverse Party received notice of
3 hearing at which such person had an opportunity to participate, and the Adverse Party was
4 present, was not present, was represented by counsel and the above-named
5 Applicant(s) was present, was not present, was represented by counsel, and
6 the Court having proper jurisdiction over the parties and this subject matter, and
7 it appearing to the satisfaction of the Court that the Adverse Party has committed
8 and/or is committing or remains a threat to commit stalking, aggravated stalking, or
9 harassment, and an Extended Order is warranted

8 or

9 based upon the stipulation of the parties,

10 **The Court enters an Extended Order**, and as a result:

11 **YOU ARE PROHIBITED**, either directly or through an agent, from contacting,
12 intimidating, using, attempting to use, or threatening the use of physical force, or otherwise
13 interfering in any way with the Applicant and/or the following persons: ALEXANDRA
14 SMITH
15 including, but not limited to, in person, by telephone, through the mail, through electronic
16 mail (e-mail), facsimile (fax), or through another person;

17 1. **YOU ARE ORDERED** to stay away from the following places:

18 Residence(s):

19 1550 RILEY AVE, RENO, NV. 89502

20 Place(s) of Employment (Name & Address):

21 1011 WILD HORSE CANYON DR., SPARKS, NV. 89434

22 School(s) (Name & Address):

23 CONFIDENTIAL

24 Other Locations Frequented (Name & Address):
25

1 CONFIDENTIAL

2
3 2. **YOU ARE FURTHER ORDERED:**

4 3. On the issue of costs and official fees, the Court orders as follows:

5
6 4. **THIS ORDER WILL REMAIN IN EFFECT UNTIL 11:59 P.M. ON THE**
7 **DATE SET FORTH ON PAGE 1 UNLESS THE COURT ORDERS OTHERWISE.**

8 5. **YOU ARE HEREBY NOTIFIED THAT** if you are arrested for violating this
9 order, you will not be admitted to bail sooner than 12 hours after your arrest if:

10 (a) The arresting officer determines that such a violation is accompanied by a direct or
indirect threat of harm;

11 (b) You have previously violated a temporary or extended order for protection; or

12 (c) At the time of the violation or within 2 hours after the violation, you have:

13 (1) A concentration of alcohol of 0.08 or more in your blood or breath; or

14 (2) An amount of a prohibited substance in your blood or urine that is equal to
or greater than the amount set forth in subsection 3 of NRS 484.379.

15 6. IT IS FURTHER ORDERED that the Clerk of the Court shall transmit a copy
16 of this Order together with the application, to the Washoe County Sheriff's Office and/or the
Reno Constable and/or any other appropriate law enforcement agency.

17 7. IT IS FURTHER ORDERED that said law enforcement agency will promptly
18 attempt to serve this Order upon the Adverse Party, without charge to the Applicant, and upon
19 service file a return of service with the Court by the end of the next business day after service
20 is made.

NOTICE TO LAW ENFORCEMENT

Any law enforcement officer, with or without a warrant, may arrest and take into custody the Adverse Party, when the law enforcement officer has probable cause to believe that (a) an Order has been issued pursuant to NRS 200.591 against the Adverse Party; (b) the Adverse Party has been served with a copy of the Order; and (c) the Adverse Party is acting or has acted in violation of the Order. This arrest may occur regardless of whether the violation occurred in the officer's presence.

Any law enforcement agency in this state may enforce a Court Order issued pursuant to NRS 200.591, without regard to the county in which the Order is issued.

IT IS SO ORDERED this 3RD day of MARCH, 2016.

Senior JUDGE
Ausum Deriso

PROOF OF SERVICE UPON ADVERSE PARTY

I, the undersigned, personally served the Adverse Party above named with a copy of this Extended Order for Protection Against Stalking, Aggravated Stalking or Harassment on the date set forth below.

[Signature] #6485
Signature #
J. Lockhart 6485
Print Name
3-3-16
Date of Service

EXHIBIT O
Decision and Extended Order for
Protection Against Stalking, Aggravated
Stalking, or Harassment, *Adkins v.*
***Greer*, Case No. RSC2016-000036**
(Reno Justice Ct.)

FILED

2016 MAR -3 PM 12: 28

IN THE JUSTICE COURT RENO TOWNSHIP
WASHOE COUNTY, STATE OF NEVADA

STEVE TUTTLE
RENO JUSTICE COURT
BY *Vortisch*
DEPUTY

Extended Protective Order Hearing

Tara Adkins Date: March 03, 2016
Time: 10:00 AM

v. Case Number: RCP2016-000036
Department 6

Russell Godfrey Greer

Decision

- Applicant, Tara Adkins appeared and was represented by Courtney Forster, Esq.
Adverse Party, Russell Godfrey Greer appeared. Additional name of Brett R. Ross added
on the record as an alias.

An Extended Protection Order against Stalking and Harassment is granted to expire on
March 2, 2017 at 11:59 p.m. The Extended Order was served in Court by the Bailiff.

Senior Judge Susan Deriso
Justice of the Peace

Proof of Service

FILED
16 MAR -3 AM 11:43
STEVE TUTTLE
RENO JUSTICE COURT
BY [Signature]
DEPUTY

Case No. RCP 2016-000036
Dept. No. 6

IN THE JUSTICE COURT OF RENO TOWNSHIP
COUNTY OF WASHOE, STATE OF NEVADA

TARA ADKINS)
)
 Applicant,)
)
)
 vs.)
)
 RUSSELL GODFREY GREER)
)
 AKA BRETT R. ROSS)
)
 Adverse Party.

EXTENDED ORDER FOR
PROTECTION AGAINST
STALKING, AGGRAVATED
STALKING, OR HARASSMENT
(NRS 200.591)

Date Issued: MARCH 3, 2016

Expiration Date: MARCH 2, 2017

YOU, THE ADVERSE PARTY, ARE HEREBY NOTIFIED THAT ANY INTENTIONAL VIOLATION OF THIS ORDER IS A CRIMINAL VIOLATION and can result in your immediate arrest or issuance of an arrest warrant. Unless a more severe penalty is prescribed by law for the act that constitutes the violation of the order, a violation of an Extended Order for Protection Against Stalking, Aggravated Stalking or Harassment is a category C felony which is punishable by imprisonment in the state prison for not more than five (5) years, and a fine of not more than \$10,000.00.

PURSUANT TO NRS 193.166, if the act that constitutes the violation of a protection order is itself a felony, the violator shall, in addition to the term of imprisonment prescribed by statute for the crime, be punished by imprisonment in the state prison for a minimum term of not less than 1 year and a maximum term of not more than 20 years.

YOU ARE FURTHER NOTIFIED that you CAN BE ARRESTED even if the person who obtained the order invites or allows you to contact them. You have the *sole responsibility* to avoid or refrain from violating the terms of this order. Only the Court can change the order upon written application.

WARNING: Possession of a firearm or ammunition while this order is in effect may constitute a felony under federal law punishable by a fine of up to \$250,000 and/or a prison sentence of up to ten (10) years.

This order meets the Full Faith and Credit provisions of the Violence Against Women Act and is enforceable in all 50 states, the District of Columbia, U.S. Territories and Indian Nations. All other Courts and law enforcement with jurisdiction within the United States and all Indian Nations shall give full faith and credit to this order pursuant to 18 U.S.C. Sec. 2265.

Violation of the order may subject you to federal charges and punishment pursuant to 18 U.S.C. Sec. 2261(a)(1) and (2) and 2262(a)(1) and (2).

The Court having considered the filings, testimony (if applicable) and evidence presented at hearing, and the Court having found that the Adverse Party received notice of hearing at which such person had an opportunity to participate, and the Adverse Party was present, was not present, was represented by counsel and the above-named Applicant(s) was present, was not present, was represented by counsel **COURTNEY FORSTER, ESQ.**, and the Court having proper jurisdiction over the parties and this subject matter, and

it appearing to the satisfaction of the Court that the Adverse Party has committed and/or is committing or remains a threat to commit stalking, aggravated stalking, or harassment, and an Extended Order is warranted

or

based upon the stipulation of the parties,

The Court enters an Extended Order, and as a result:

YOU ARE PROHIBITED, either directly or through an agent, from contacting, intimidating, using, attempting to use, or threatening the use of physical force, or otherwise interfering in any way with the Applicant and/or the following persons: including, but not limited to, in person, by telephone, through the mail, through electronic mail (e-mail), facsimile (fax), or through another person;

1. **YOU ARE ORDERED** to stay away from the following places:

Residence(s):

CONFIDENTIAL

Place(s) of Employment (Name & Address):

WORLD FAMOUS MUSTANG RANCH; 1011 WILD HORSE CANYON DR., SPARKS, NV. 89434

School(s) (Name & Address):

Other Locations Frequented (Name & Address):

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2. **YOU ARE FURTHER ORDERED:**

3. On the issue of costs and official fees, the Court orders as follows:

4. **THIS ORDER WILL REMAIN IN EFFECT UNTIL 11:59 P.M. ON THE DATE SET FORTH ON PAGE 1 UNLESS THE COURT ORDERS OTHERWISE.**

5. **YOU ARE HEREBY NOTIFIED THAT** if you are arrested for violating this order, you will not be admitted to bail sooner than 12 hours after your arrest if:

- (a) The arresting officer determines that such a violation is accompanied by a direct or indirect threat of harm;
- (b) You have previously violated a temporary or extended order for protection; or
- (c) At the time of the violation or within 2 hours after the violation, you have:
 - (1) A concentration of alcohol of 0.08 or more in your blood or breath; or
 - (2) An amount of a prohibited substance in your blood or urine that is equal to or greater than the amount set forth in subsection 3 of NRS 484.379.

6. IT IS FURTHER ORDERED that the Clerk of the Court shall transmit a copy of this Order together with the application, to the Washoe County Sheriff's Office and/or the Reno Constable and/or any other appropriate law enforcement agency.

7. IT IS FURTHER ORDERED that said law enforcement agency will promptly attempt to serve this Order upon the Adverse Party, without charge to the Applicant, and upon service file a return of service with the Court by the end of the next business day after service is made.

NOTICE TO LAW ENFORCEMENT

Any law enforcement officer, with or without a warrant, may arrest and take into custody the Adverse Party, when the law enforcement officer has probable cause to believe that (a) an Order has been issued pursuant to NRS 200.591 against the Adverse Party; (b) the Adverse Party has been served with a copy of the Order; and (c) the Adverse Party is acting or has acted in violation of the Order. This arrest may occur regardless of whether the violation occurred in the officer's presence.

Any law enforcement agency in this state may enforce a Court Order issued pursuant to NRS 200.591, without regard to the county in which the Order is issued.

IT IS SO ORDERED this 3RD day of MARCH, 2016.

Senior JUDGE
Debra DeRiso

PROOF OF SERVICE UPON ADVERSE PARTY

I, the undersigned, personally served the Adverse Party above named with a copy of this Extended Order for Protection Against Stalking, Aggravated Stalking or Harassment on the date set forth below.

[Signature] #6485

Signature

J. Lockhart #6485

Print Name

3/3/2016

Date of Service

EXHIBIT P
Sentencing Protective Order, *Orem City*
***v. Greer*, Case No. 201900105**
(Orem City Justice Ct.)

Sentencing Protective Order



Court: Orem City Justice Court
Case No: 201900105 **District:** FOURTH
County: UTAH **State:** Utah
Judge: REED PARKIN

Name of Plaintiff OREM CITY	Name of Defendant RUSSELL G GREER
Person(s) Protected by this Order:	Defendant Identifying Information:
Name: [REDACTED] Age:	Sex: <i>M</i> Race:
Relationship to Defendant: <i>Other</i>	Height: Weight:
Name: [REDACTED] Age:	Eyes: Hair:
Relationship to Defendant: <i>Other</i>	Date of Birth: [REDACTED] SSN:
	Driver License #: State:
	Expiration:
	Distinguishing Features (Scars, Marks, Tattoos, etc):
	Other Names Used:

The Court orders the Defendant to obey all orders on this form and to not abuse or threaten to abuse anyone protected by this order.

Warnings:

•This is a court order. No one except the court can change it. If you do not obey this order, you can be arrested, fined, and face other charges.

- 1 The Defendant is restrained from attempting, committing, or threatening to commit domestic violence or abuse against the victim, designated family, and household members (protected parties) and shall not stalk, harass, or threaten, or use or attempt to use physical force.

[REDACTED]

- 2 The Defendant is prohibited from directly or indirectly contacting, harassing, telephoning, mailing, e-mailing, or communicating in any way with the victim.
- 3 Defendant is ordered to stay away from any address where victim is known to be.
- 4 The Defendant is ordered to stay away from the alleged victim's vehicle, job, school, home, premises and property (list current addresses below):

[REDACTED]

Home, Premises, and property:
Work:
School:
Other: ANY ADDRESS , , UT
Vehicle:

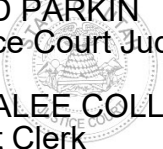
[REDACTED]

Home, Premises, and property:
Work:
School:
Vehicle:

A violation of this order is a Class A misdemeanor.

Dated: September 16,
2020
02:21:36 PM

At the direction of:
/s/ REED PARKIN
Justice Court Judge
by
/s/ CARALEE COLLET
Court Clerk





Nice 😊

JAN 12, 2024



You're looking so beautiful, hun

Thanks!



What's your schedule like babe? I might swing up there to party with you 😘

I work full-time and I'm here 4 PM to 4 AM

I usually take Sunday and Monday off, but I have a project to do in my

trailer on Wednesday of this upcoming week



Ok babe 😘

8:55 📅



1...



just_some_dude_nam...

Business chat



I would also love to explore a relationship of some kind with you. I'm a good guy and im involved in sex work. I'm improving the industry



JAN 26, 2024



Hey sweetie

JAN 29, 2024



Love you xo have a good week

JAN 29, 2024



What's your numero

JAN 31, 2024



Nice ignoring me lol

I also forgive you for calling me creepy looking (for having a paralyzed face) when the dudes commenting on your profile aren't exactly winners. I've only been nice to you. If you still want to meet for valentines , let's set it in stone. If not, I will wish you the best.



Message...



Business Chat



Ok babe 😘

JAN 18, 2024

Replied to your story



Comfy

JAN 18, 2024



I'm thinking valentines to come up there :)



JAN 19, 2024



What's a good number I can text you on? Just since I would be driving 6 hours up there, it'd be nice to stay in touch ❤️



JAN 21, 2024



JAN 5, 2024



I'm gonna come meet you, baby



JAN 5, 2024



Would you be interested in being a madame for a place im opening? Meeting with one of my investors tomorrow.

JAN 10, 2024



JAN 11, 2024



jus [redacted] wasn't notified about this message because they're in quiet mode.
[Turn on quiet mode](#)

JAN 11, 2024

Replied to your story



just_som
Business chat



just_som [redacted]

[Learn about business chats](#)

[View profile](#)

MAY 4, 2023

Hey



I've tried reaching out to you on my pac email

JAN 1, 2024



Have a happy new year, beautiful

JAN 5, 2024



I'm gonna come meet you, baby



JAN 5, 2024

Would you be interested in being a



If you suspect you may not be the intended recipient, please notify the sender and delete all copies.

3:05



just_some_dude_nam...

Business chat



I would also love to explore a relationship of some kind with you. I'm a good guy and im involved in sex work. I'm improving the industry



JAN 26, 2024



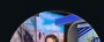
Hey sweetie

JAN 29, 2024



Love you xo have a good week

JAN 29, 2024



What's your numero



What's your number

JAN 31, 2024



Nice ignoring me lol

I also forgive you for calling me creepy looking (for having a paralyzed face) when the dudes commenting on your profile aren't exactly winners. I've only been nice to you. If you still want to meet for valentines , let's set it in stone. If not I will wish you the best



Message...



3:06



just_some_dude_nam...

Business chat



FEB 13, 2024



Babe you tried calling?

FEB 17, 2024



You been a bad girl by not replying.



FEB 17, 2024

Takes your v-card



(Your valentines card haha) 🤪

FEB 18, 2024

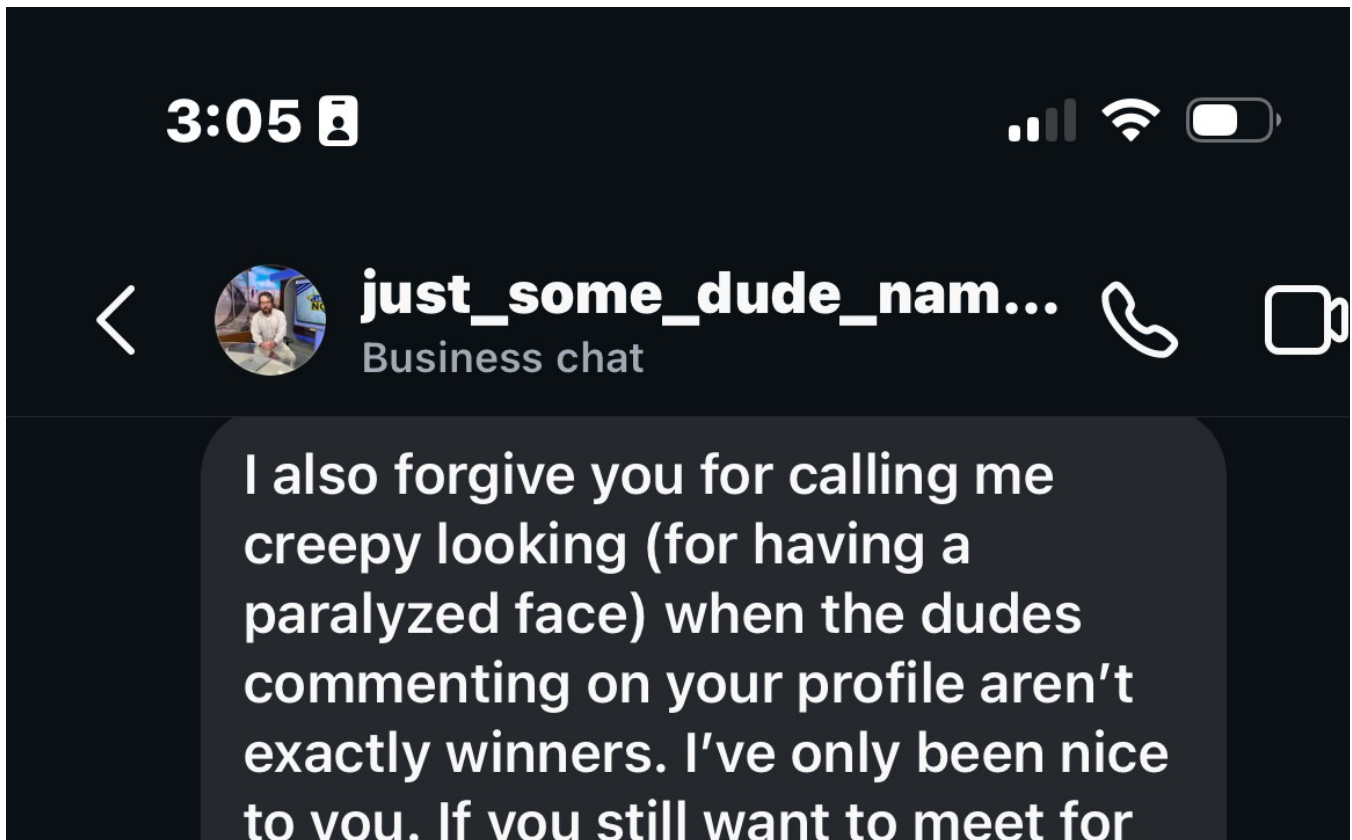
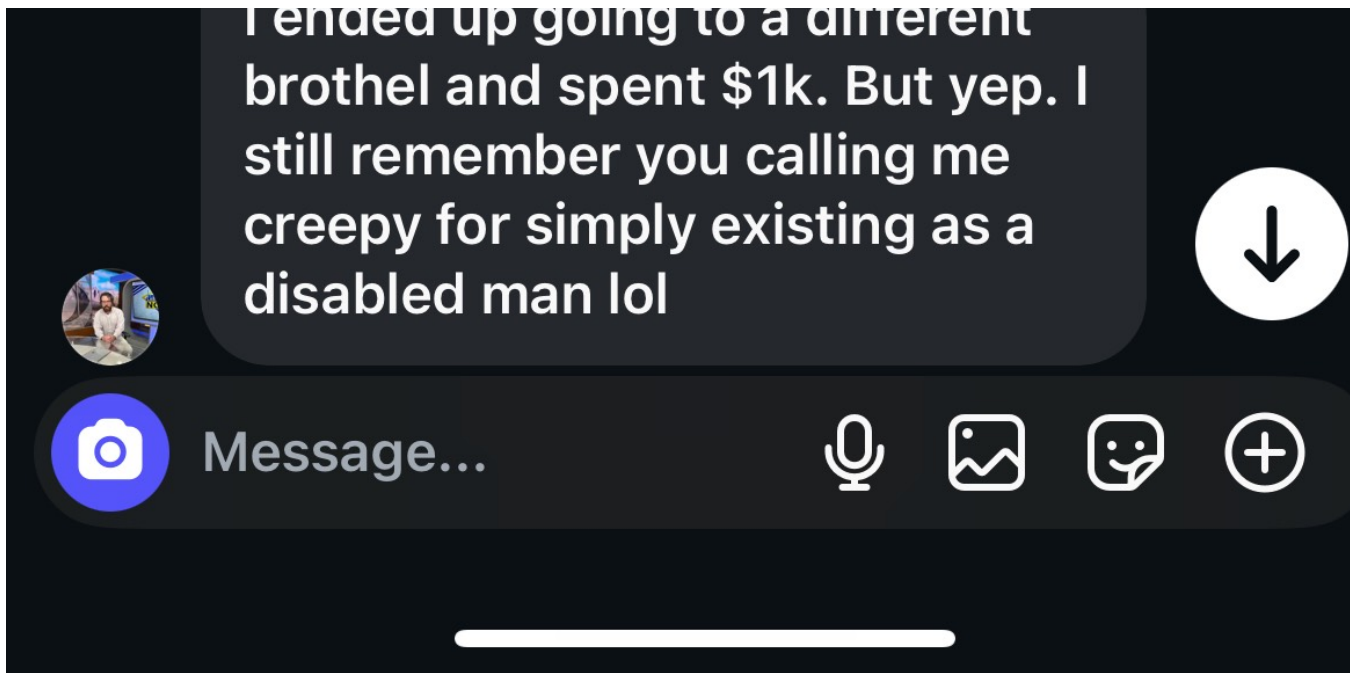


Well I was gonna spend \$1k. My bad

FEB 29, 2024

Lol so you would Dm creepy d.i. But ignore me

Ended up going to a different





valentines , let's set it in stone. If not, I will wish you the best.

JAN 31, 2024

Im busy myself. Setting up a brothel of my own and just navigating through my life.

And I hope you work in my brothel and I will have a play area for your little Kitty



FEB 5, 2024



Hey girlfriend 😘

FEB 6, 2024

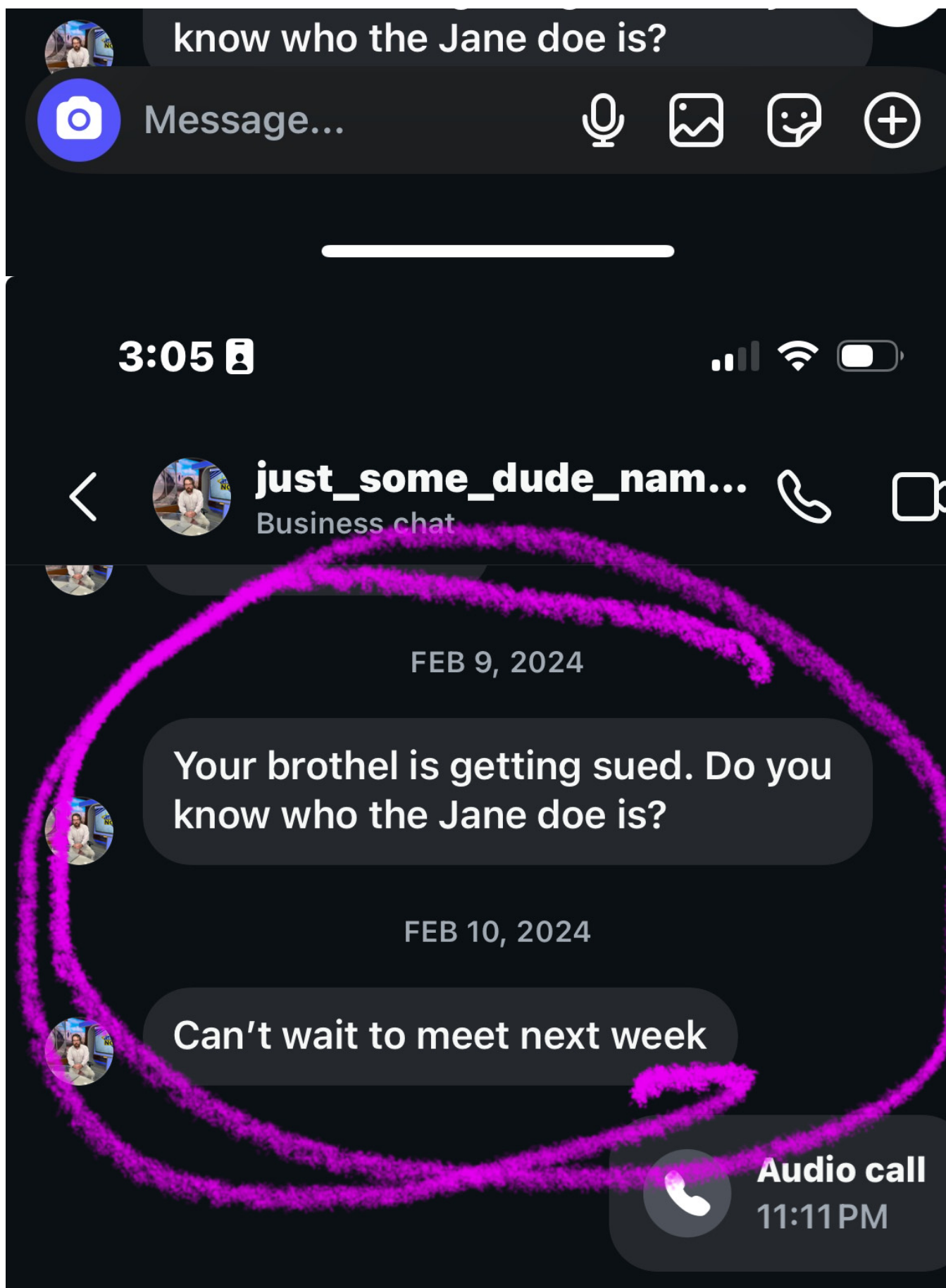


Tickle tickle 👉

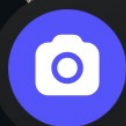
FEB 9, 2024

Your brothel is getting sued. Do you





know who the Jane doe is?



Message...



3:05



just_some_dude_nam...

Business chat



FEB 9, 2024

Your brothel is getting sued. Do you know who the Jane doe is?

FEB 10, 2024

Can't wait to meet next week



Audio call

11:11 PM



Audio call ended
11:11 PM



You tried calling



Audio call
11:20 PM

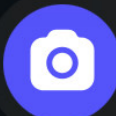


Missed audio call

Call back



0:09

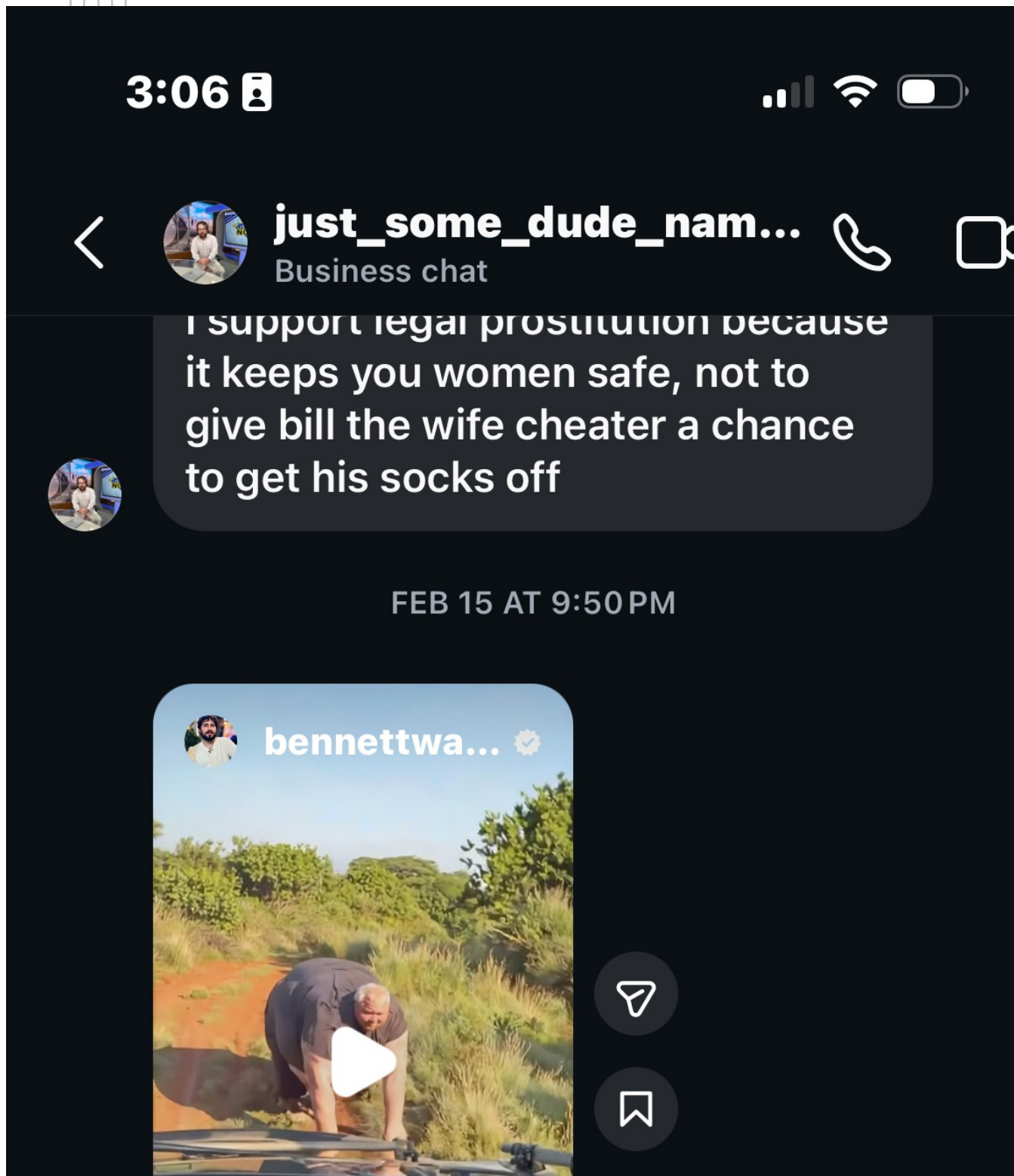


Message...



Matthew D. Hardin
Hardin Law Office
Direct Dial: 202-802-1948
NYC Office: 212-680-4938
Email: MatthewDHardin@protonmail.com

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Your average client ;)

MAR 18 AT 9:07 PM



Hey sexy

3:06 PM

You turned on disappearing messages. New messages and reactions will disappear 24 hours after everyone has seen them. [Change](#)



Disappearing message...



3:06



just_some_dude_nam...



Business chat



Post unavailable
This post is unavailable.

DEC 15 AT 8:49 AM



Hey sexy lady.

DEC 19 AT 1:40 AM



You've seen so many losers at that Elko place that you won't give legit guys like me a chance to even talk



I won't forget how you called me creepy looking FOR HAVING A DISABILITY, when the average guy who sees you probably weighs 400 pounds lol

JAN 26 AT 6:56 AM

Hey baby



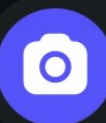
Can we please talk

JAN 26 AT 8:04 AM



I want to be your manager and your pimp at the place I'm opening

FEB 9 AT 10:03 AM



Message...



3:06



just_some_dude_nam...

Business chat



FEB 9 AT 10:03 AM

I still don't get why you hate me lol

Honey, I've seen the overweight guys who go to brothels

You don't need to act like my

You don't need to act like my disability is so bizarre



Edited

I support legal prostitution because it keeps you women safe, not to give bill the wife cheater a chance to get his socks off

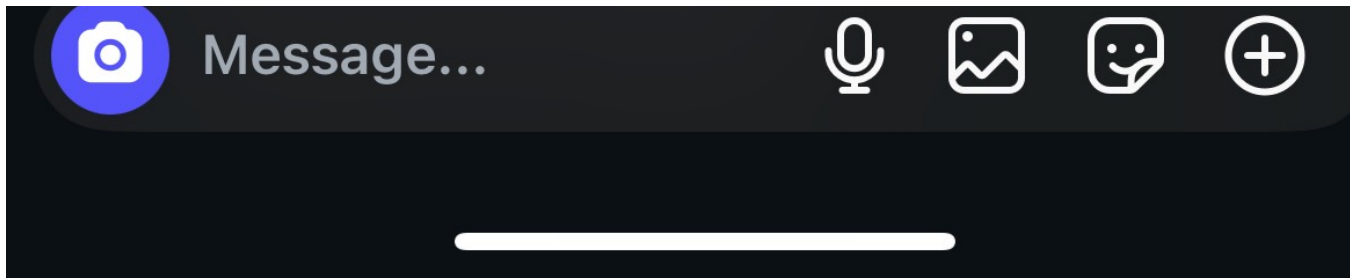


FEB 15 AT 9:50 PM



bennettwa... 





Of course, you are under absolutely no obligation to speak with me, but I think your knowledge of Mr. Greer and his antics in Nevada could be very helpful for a client of mine named Joshua Moon, who is the latest of many people to be sued by Mr. Greer. I would very much appreciate a call if you are willing to discuss further.

Best,

Matthew D. Hardin

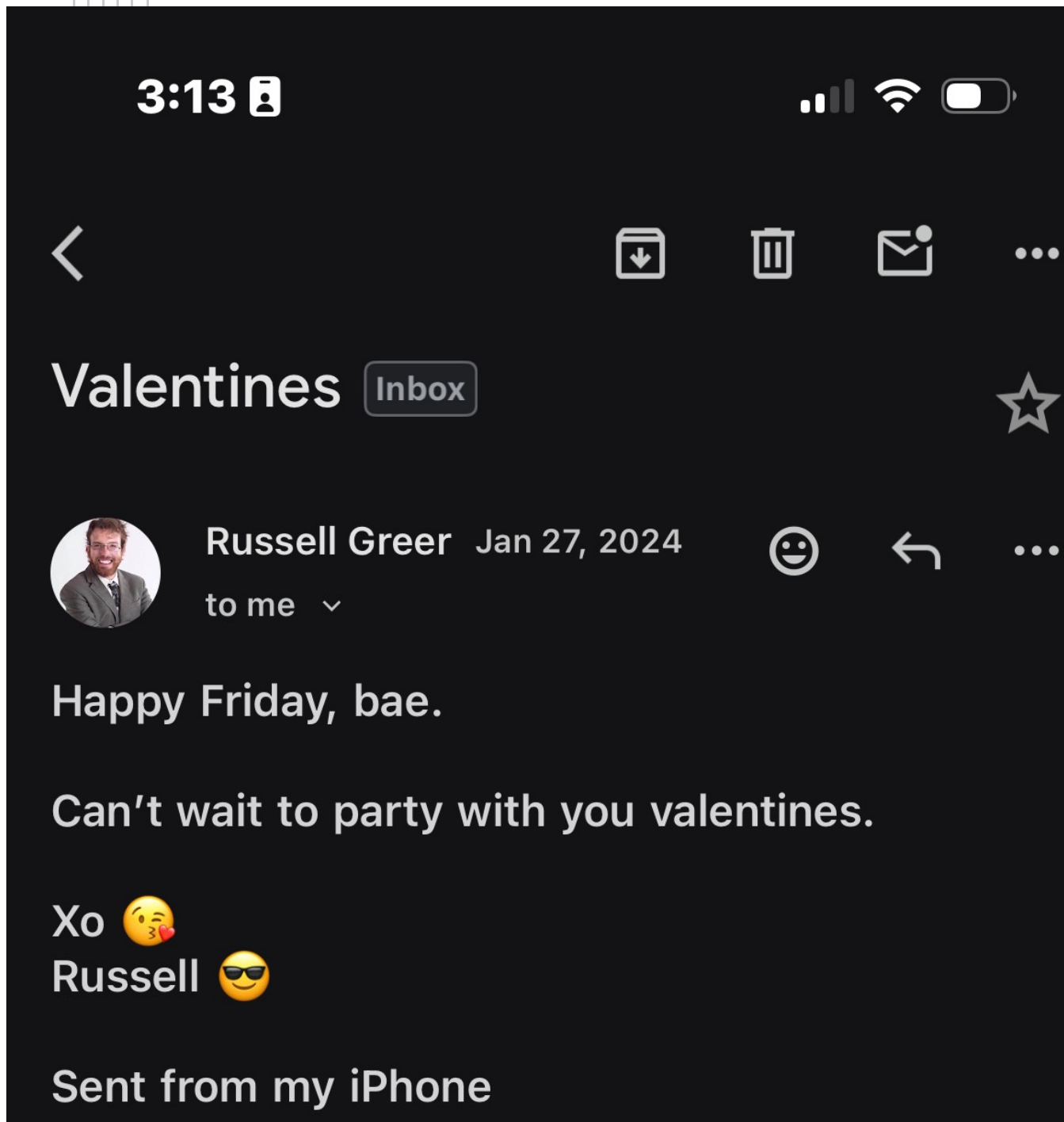
Hardin Law Office

Direct Dial: 202-802-1948

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Email: MatthewDHardin@protonmail.com

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Looking
forward to it
too!

Me too!

Looking
forward to
seeing you, too!

← Reply

→ Forward



3:13 





Creepy guys

Inbox



Russell Greer May 7, 2023



to me ▾

I bet you a bunch of "creepy guys" walk in to see you since you invite them with a wide open invitation.

Don't worry: I've seen the old creepy guys who go in those places.

At least I have an excuse for how I look and at least I'm trying to help SWers not use them, like the others do.

Sorry, but what you said super hurt and you won't even apologize. It says so much about your character



VZW Wi-Fi



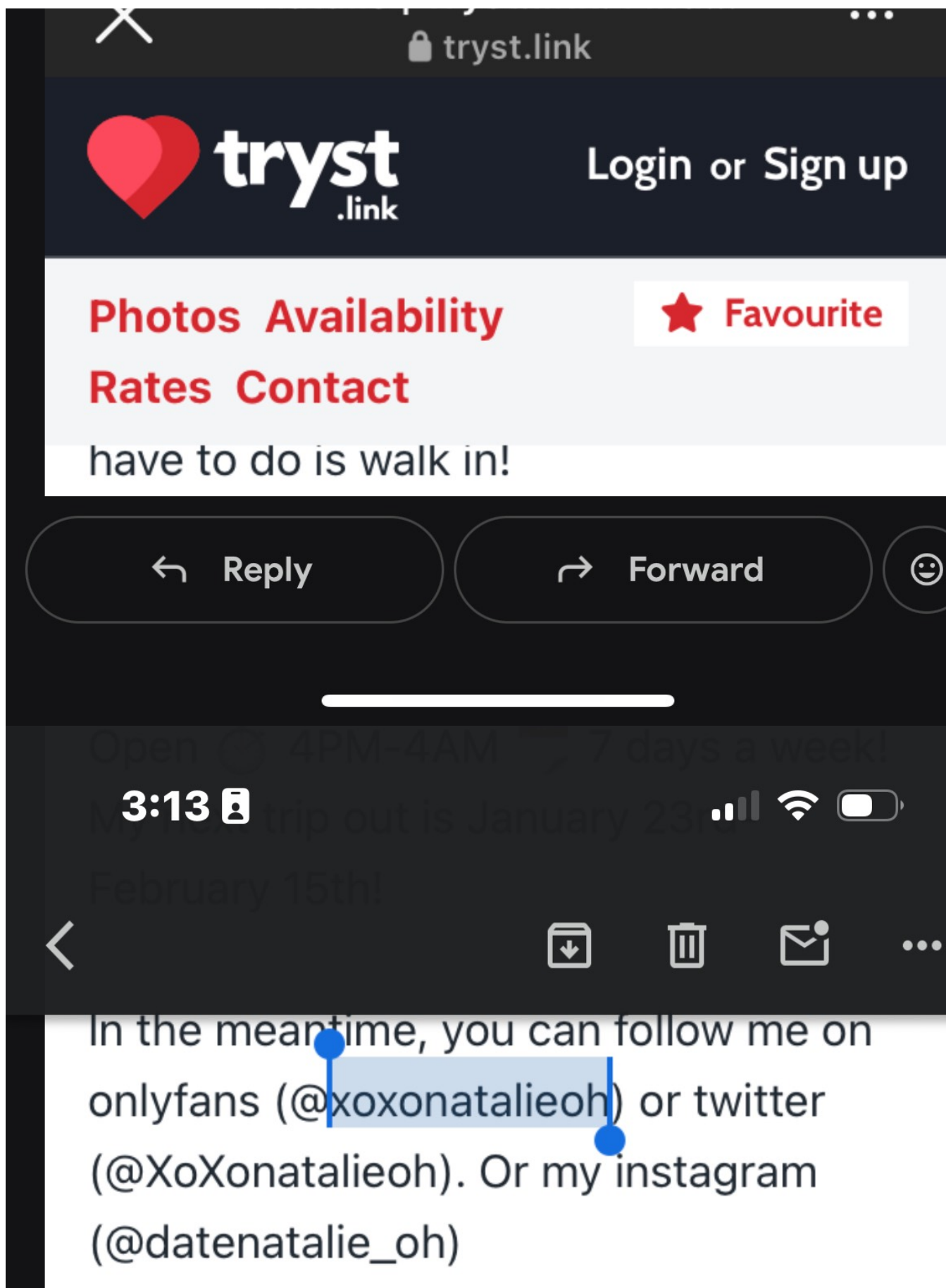
5:54 PM



8%



Natalie | Tryst.link: Find...





SEARCH



LOGIN



SIGN UP



Russell Greer

CEO of ID LLC/Paralyzed Face
Productions/CART U

NV Bus. License #NV20222557279

www.russellgreer.com

Sent from my iPhone

← Reply

→ Forward



3:12 📱



Facial disability Inbox



Russell Greer May 5, 2023



to me ▾

Hi,

Since you think people with facial disabilities "look creepy", I thought I would enlighten you with the disability I have. https://en.m.wikipedia.org/wiki/Moebius_syndrome

My life has been super difficult, but I keep

going. Sex work has helped me out a lot and that's why I'm trying to improve the industry.

I only approached you because mega donors want to see a sex worker visible in the group. We have sex workers who support us, but they don't want to be seen. I was approaching you because you're super cute and thought this might be of interest to you.

I never meant to come off rude or anything and I could have reworded my second email. Just understand how it looks on my end.

Again, I forgive you for attacking me for my immutable traits.

Russell Greer
CEO of ID LLC/Paralyzed Face

← Reply

→ Forward



3:13 





Going to have sex with you

Inbox



Russell Greer Sep 20, 2024



to me ▾

Hey Natalie.

I see you're starting at alien. I can't blame you since Elko is full of ugly red neck truckers. But I'm luckily close by and so when you come to alien, I'm gonna be CUMMING IN YOU. ;) haha. Play on words.

Your admirer and brothel Prince,

Russell Greer

Sent from my iPhone