

**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*

---

THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

---

<p>RUSSELL GREER,</p> <p>Plaintiff,</p> <p>v.</p> <p>JOSHUA MOON, <i>et al.</i></p> <p>Defendants.</p>	<p><b>DEFENDANTS’ NOTICE OF SUPPLEMENTAL AUTHORITY</b></p> <p>Case No. 2:24-cv-00421-DBB</p> <p>District Judge David Barlow Magistrate Judge Jared C. Bennett</p>
--	---

NOW COME Defendants Joshua Moon and Lolcow, LLC, by and through their undersigned counsel, and file this Notice of Supplemental Authority regarding Defendants’ Motion to Review Mr. Greer’s *In Forma Pauperis* Status, ECF No. 253,<sup>1</sup> Defendants’ Opposition to Mr. Greer’s “Emergency” Request for a Continuance, ECF No. 277, and Defendants Motion for Sanctions. ECF No. 234.

On May 12, 2025, undersigned counsel submitted a public records request to the Humboldt County, Nevada official Mr. Greer identified as relevant to his business dealings in state court litigation, *Greer v. Gilman Development LLC et al.*, Case No.

---

<sup>1</sup> Defendants recognize that this underlying motion was granted by this Court at ECF No. 283. The purpose of this filing is to ensure that the record is complete should Mr. Greer seek review or reconsideration of that order or otherwise prove unable or unwilling to comply with it.

CV0023235 (Humboldt Co. Nev. Dist. Ct.).<sup>2</sup> The relevant Humboldt County official responded immediately as set forth in Exhibit A, and provided undersigned counsel with the documents identified in Exhibit B related to Mr. Greer's recent business dealings in Humboldt County. These documents reveal that Mr. Greer has had substantial financial resources since at least 2022. Specifically:

1. On August 25, 2022, Mr. Greer told Humboldt County officials that he was "with a real estate development company" named "Intimate Dealings, LLC." Exhibit B, p. 11-14. Intimate Dealings LLC appears to have had only one member according to Nevada public records: Russell Greer. Nevada Secretary of State, Entity No. E22627342022-2, <https://esos.nv.gov/EntitySearch/BusinessInformation> (last visited May 12, 2025). That LLC also had a commercial registered agent, although Mr. Greer listed "3651 South Arville Street, Apt 711, Las Vegas, NV, 89103" as the location from which he "managed" the business. *Id.*

2. On August 30, 2022, Mr. Greer explained to Humboldt County officials that he wanted to acquire real estate upon which he could "build[] better facilities" than the existing brothels located in Winnemucca. Exhibit B, p. 8. Mr. Greer also announced that he had attempted to acquire those existing brothels, but had been rebuffed. *Id.* at

---

<sup>2</sup> Defendants filed this records request because they have reason to believe that Mr. Greer's factual representations that there was an "emergency" in rural northern Nevada on May 6, 2025, ECF No. 276, are incorrect or fraudulent in nature. On information and belief, and while awaiting further records which will demonstrate whether Defendants' allegations on information and belief are documented and supported in other public records, Defendants assert that Mr. Greer was attending a regularly-scheduled meeting of the Winnemucca, NV City Council on May 6, 2025, for the purpose of requesting rezoning of a hotel he intends or intended to purchase. See Exhibit C at p. 2. *Cf.* Exhibit D. A separate open records request undersigned counsel has filed with the Winnemucca City Manager is expected to shed further light on whether Mr. Greer's representations at ECF No. 276 were false or fraudulent in nature. Exhibit E.

pp.9-10. Not only was Mr. Greer sufficiently well-heeled to build a brothel, but the brothel he was prepared to build would be superior to those already in existence in northern Nevada. Undoubtedly, this would cost Mr. Greer no small sum of money. See, e.g., Michelle Rindells, *The Nevada Independent*, “Indy Explains: How legal prostitution works in Nevada,” May 27, 2018, <https://thenevadaindependent.com/article/the-indy-explains-how-legal-prostitution-works-in-nevada> (explaining that brothels may tens of thousands of dollars in county licensing costs alone, plus numerous other business expenses).

3. On September 2, 2022, Mr. Greer indicated to Humboldt County officials that he had retained an attorney to represent him in a lawsuit against Gilman Development LLC to force them to sell Mr. Greer property upon which to build his “better” brothel. Exhibit B, p. 6. Although this unnamed attorney never thereafter materialized in any verifiable way and Mr. Greer represented himself *pro se* (but not *in forma pauperis*) in subsequent Nevada state court litigation against Gilman Development LLC, *Greer v. Gilman Development LLC et al.*, Case No. CV0023235 (Humboldt Co. Nev. Dist. Ct.), Mr. Greer never indicated that the unidentified attorney was representing him *pro bono* or at reduced cost. Insofar as Mr. Greer appears to have paid state court filing fees in Nevada in 2022, it is not readily apparent why Mr. Greer did not pay his filing fees in this Court or in the Tenth Circuit during that relevant time period. And insofar as Mr. Greer planned not only to buy property and open a brothel in Winnemucca in 2022, but also to engage in litigation to force unwilling property owners to sell him the property upon which to operate a more expensive, “better” brothel than the competition, Mr. Greer’s 2022 emails further indicate that he

had substantial financial ability and could have paid his filing fees in this Court and in the Tenth Circuit.

4. In the 11<sup>th</sup> Circuit – where this case would be pending but for Mr. Greer’s factually inaccurate Motion to Retransfer at ECF No. 123 (which is already the subject to a Motion for Sanctions at ECF No. 234) – it is well-established that a district court is empowered to dismiss a complaint with prejudice upon determining that an *in forma pauperis* plaintiff’s allegations of poverty are untrue. *Daker v. Owens*, No. 21-13169, 2023 U.S. App. LEXIS 31534, at \*9 (11th Cir. Nov. 29, 2023), citing *Dawson v. Lennon*, 797 F.2d 934, 935-36 (11th Cir. 1986). Similarly, other courts have held that although a complaint may be permitted to proceed upon a Court’s grant of *in forma pauperis* status, the filing fee remains due and payable regardless of a plaintiff’s ostensible poverty. *Ankh El v. Indiana*, No. 1:23-cv-01094-JMS-KMB, 2023 U.S. Dist. LEXIS 119506, at \*2 (S.D. Ind. July 12, 2023), citing *Robbins v. Switzer*, 104 F.3d 895, 898 (7th Cir. 1997).

WHEREFORE, Defendants Joshua Moon and Lolcow, LLC respectfully submit that it is apparent that Mr. Greer has been ineligible to proceed in this case *in forma pauperis* since at least August of 2022. This is so because Mr. Greer professed since that time, on behalf of his LLC, to have sufficient funds not only to purchase real estate, but also to build a “better” brothel than those already existing in Winnemucca, Nevada. Mr. Greer has apparently concealed that financial ability to spend thousands of dollars from both this Court and from the Tenth Circuit while his case was pending there and prior to that Court’s entry of judgment in 2023. Additionally, based upon the information contained in the attached Exhibit C regarding Mr. Greer’s whereabouts on the day of his ostensible “emergency,” there is reason to believe that Mr. Greer has

continued to play fast and loose with his Rule 11 obligations to make accurate representations to this Court.

DATED May 12, 2025


**HARDIN LAW OFFICE**

*/s/ Matthew D. Hardin*

**Matthew D. Hardin**

Attorney for Defendants Joshua Moon  
and Lolcow, LLC



**From:** Betty Lawrence Betty.Lawrence@humboldtcountynv.gov   
**Subject:** RE: Public Records Request  
**Date:** May 12, 2025 at 12:01 PM  
**To:** Matthew Hardin hardinlawpllc@icloud.com  
**Cc:** Russell Greer russmark@gmail.com, Anthony Gordon Anthony.Gordon@humboldtcountynv.gov

Good morning – Per your request, I have attached the e-mails between myself and Mr. Greer beginning August 25, 2022 to August 10, 2023. I have included one from Jessica Smith with the GIS department only because I reference this e-mail in my e-mail of 8/10/2023 to Mr. Greer.

Betty Lawrence  
Senior Planning Technician

---

**From:** Matthew Hardin <hardinlawpllc@icloud.com>  
**Sent:** Monday, May 12, 2025 8:10 AM  
**To:** Betty Lawrence <Betty.Lawrence@humboldtcountynv.gov>  
**Cc:** Russell Greer <russmark@gmail.com>  
**Subject:** Public Records Request

Good morning, Ms. Lawrence.

Pursuant to the Nevada Public Records Act, I hereby request copies of any email correspondence in your custody, which email correspondence:

- 1) Is to or from an individual named Russell Greer; and
- 2) Relates to the topic of adult entertainment or prostitution; and
- 3) Is dated at any time within the past four calendar years.

Pursuant to *Las Vegas Review Journal v. Clark County School District*, 134 Nev. Adv. Op. 84 (2018), I wish to inform you that there is extensive public interest in the release of these documents. Specifically, Mr. Greer appears to be a prolific advocate for prostitution in rural communities across Nevada and elsewhere, and also a prolific litigant in the federal and state courts on topics both related and unrelated to prostitution. Mr. Greer is also documented to have a misdemeanor conviction arising from inappropriate behavior towards one woman in Utah, and has been the subject of at least three separate personal protection or restraining orders, all of which arise from further allegations of unlawful behavior towards women. Additionally, Mr. Greer appears to have made representations to the U.S. District Court for the District of Utah on May 2, 2025 that he could not attend a virtual hearing scheduled in that Court on May 6, 2025 because he would be attending an “emergency” meeting of the Winnemucca City Council of which he did not have advance notice, apparently with reference to a topic on which he has communicated with you and perhaps other Humboldt County officials regarding various lots in Winnemucca.

Public records you might release in response to this request will shed light not only on Mr. Greer’s broader advocacy for the expansion of prostitution in Humboldt County and his behavior towards women, but will also shed light on the extent to which Mr. Greer has been honest or dishonest to the federal court in Utah.

Thank you for your prompt attention to this request. Please let me know if you need any

further information from me to facilitate your search for records or to evaluate the extent of the public interest in their release. On information and belief, Mr. Greer may have used [russmark@gmail.com](mailto:russmark@gmail.com) or [russellgreer27@icloud.com](mailto:russellgreer27@icloud.com) to communicate with you.

Thank you,

**Matthew D. Hardin**  
**Hardin Law Office**  
Direct Dial: 202-802-1948  
NYC Office: 212-680-4938  
Email: [MatthewDHardin@protonmail.com](mailto:MatthewDHardin@protonmail.com)

**Records Request-Greer.pdf**  
515 KB





**Betty Lawrence**

---

**From:** Jessica Smith  
**Sent:** Thursday, August 10, 2023 3:53 PM  
**To:** Betty Lawrence  
**Subject:** FW: Zoning map

*Jessica Smith  
GIS Technician  
Humboldt County Assessor's Office  
50 W. 5th St.  
Winnemucca, NV 89445  
(775)623-6315*

**From:** A Safer Nevada Director <contact@asafernevada.org>  
**Sent:** Thursday, August 10, 2023 3:49 PM  
**To:** Jessica Smith <jessica.smith@humboldtcountynv.gov>  
**Subject:** Re: Zoning map

Jessica.

I appreciate the info.

I did want to ask: WMC 17.30.040(J) says that adult entertainment can be in the general commercial zone district with a conditional use permit. Would adult entertainment include brothels?

I ask because yes, I know: the AE zone is Blocks 40 and 41, however, Gilman, the owner of the blocks, is not wanting to play fair and so I actually just recently saw that the GC zone allows adult entertainment with a conditional use permit.

So if a conditional use permit could allow brothels, can I have the appropriate paperwork for a conditional use? WMC 17.68.020 says that as part of the conditional use pre-application process, one is to consult with the Humboldt County planning department.

Russell Greer

A Safer Nevada  
[contact@asafernevada.org](mailto:contact@asafernevada.org)  
[www.asafernevada.org](http://www.asafernevada.org)

On Aug 10, 2023, at 2:28 PM, Jessica Smith <[jessica.smith@humboldtcountynv.gov](mailto:jessica.smith@humboldtcountynv.gov)> wrote:

Mr.Greer,  
Please find a general zoning map attached. If you need definitions please refer to this link →

<https://www.codepublishing.com/NV/HumboldtCounty/#!/HumboldtCounty17/HumboldtCounty17.html>

*Jessica Smith*  
*GIS Technician*  
*Humboldt County Assessor's Office*  
*50 W. 5th St.*  
*Winnemucca, NV 89445*  
*(775)623-6315*

---

**From:** Betty Lawrence <[Betty.Lawrence@humboldtcountynv.gov](mailto:Betty.Lawrence@humboldtcountynv.gov)>  
**Sent:** Thursday, August 10, 2023 2:23 PM  
**To:** A Safer Nevada Director <[contact@asafernevada.org](mailto:contact@asafernevada.org)>  
**Cc:** Jessica Smith <[jessica.smith@humboldtcountynv.gov](mailto:jessica.smith@humboldtcountynv.gov)>  
**Subject:** RE: Zoning map

Russell – you will need to contact Jessica in the GIS Department. I have included her in this response.

*Betty Lawrence*  
Senior Planning Technician

---

**From:** A Safer Nevada Director <[contact@asafernevada.org](mailto:contact@asafernevada.org)>  
**Sent:** Thursday, August 10, 2023 2:17 PM  
**To:** Betty Lawrence <[Betty.Lawrence@humboldtcountynv.gov](mailto:Betty.Lawrence@humboldtcountynv.gov)>  
**Subject:** Zoning map

Hi, Betty

Are you able to provide me with a zoning map of Winnemucca that shows different zoning districts on it? Just trying to figure out where the industrial, general commercial, etc areas are.

Russell Greer

A Safer Nevada  
[contact@asafernevada.org](mailto:contact@asafernevada.org)  
[www.asafernevada.org](http://www.asafernevada.org)  
<Winnemucca\_Zoning\_Map\_1\_10,000\_ArchD.pdf>

## Betty Lawrence

---

**From:** A Safer Nevada Director <contact@asafernevada.org>  
**Sent:** Thursday, August 10, 2023 4:42 PM  
**To:** Betty Lawrence  
**Cc:** Alicia Heiser  
**Subject:** Re: Adult entertainment inquiry

Ok, I will contact her.

But Gilman has a history of doing this. He will go into a city or county and ensure no other competition can operate. For instance, he owns a brothel in Storey County. He got elected as a Storey County Commissioner in 2012. In 2015, he helped amend the county code to ensure no other brothels can open. In your city, he bought all of the only zoned land.

So is that not of concern? It should be. I'm not a casino guy, but if MGM owned all of the only casino zoned lots here in Las Vegas, it would be confusing why the city would allow that. So I don't understand why your county/city doesn't care.

Russell Greer

A Safer Nevada  
[contact@asafernevada.org](mailto:contact@asafernevada.org)  
[www.asafernevada.org](http://www.asafernevada.org)

On Aug 10, 2023, at 4:36 PM, Betty Lawrence <Betty.Lawrence@humboldtcountynv.gov> wrote:

Mr. Greer – To be honest I do not believe the City Council will even consider this. You can contact Alicia Heiser, City Manager/Engineer to request to be placed on a City Council agenda.

*Betty Lawrence*  
Senior Planning Technician

---

**From:** A Safer Nevada Director <contact@asafernevada.org>  
**Sent:** Thursday, August 10, 2023 4:34 PM  
**To:** Betty Lawrence <Betty.Lawrence@humboldtcountynv.gov>  
**Subject:** Re: Adult entertainment inquiry

Hi, Betty.

I understand. Who is it, then, that I can contact to get this on a Winnemucca City Meeting to amend the city law to allow other zones to allow brothels within Winnemucca?

Russell Greer

A Safer Nevada

[contact@asafernevada.org](mailto:contact@asafernevada.org)  
[www.asafernevada.org](http://www.asafernevada.org)

On Aug 10, 2023, at 4:24 PM, Betty Lawrence  
<[Betty.Lawrence@humboldtcountynv.gov](mailto:Betty.Lawrence@humboldtcountynv.gov)> wrote:

Mr. Greer – in response to your question to Jessica. I have reviewed Winnemucca Municipal Code Chapter 17.81.040. Adult Entertainment is not reflected as a use allowed with a Special Use Permit. The only use allowed in G-C zoning is adult entertainment in cabarets or bars, which is an allowed use.

Humboldt County Code Chapter 17.30.040 Conditional Uses in the GC zoning does indicate Adult Entertainment Activities, which does not include prostitution. Below is the definition of Adult entertainment activity:

**17.16.050 Adult entertainment activity.**

“Adult entertainment activity” means any activity which is conducted exclusively for the patronage of persons who are eighteen years of age or older and from which persons seventeen years of age or younger are specifically excluded, and includes, but is not limited to, such businesses as adult bookstores, adult motion pictures theaters, adult entertainment and adult entertainment in cabarets. (Ord. 1-5-87A § 8(C))

Please note that there are separate zoning codes for the City of Winnemucca and Humboldt County. Do not hesitate to contact me if you have further questions or require additional information.

*Betty Lawrence*  
Senior Planning Technician

## Betty Lawrence

---

**From:** Intimate Dealings Manager <info@intimatedealings.com>  
**Sent:** Friday, August 4, 2023 4:23 PM  
**To:** Betty Lawrence  
**Subject:** Re: Brothel zoning question

Hi,

I just wanted to let you know that I am putting together a group of voters in Winnemucca to get a question on the ballot amend the Winnemucca City Code to change A-E zoning from Blocks 40 and 41 to a different block. I'm doing this after the ridiculous treatment Gilman has shown me. There is no reason one person should own the entire market in one city.

And as a side note, WCC 5.12.010(E)(5) prevents anyone who has had a privilege license revoked from opening up another privileged business. Gilman had a brothel shut down in 2012 after its license was revoked. So not sure how he expects to even open them in Winnemucca.

[https://library.municode.com/nv/winnemucca/codes/code\\_of\\_ordinances?nodeId=TITSBULIRE\\_CH5.12PRBULI\\_5.12.01ODEPUOPRBU](https://library.municode.com/nv/winnemucca/codes/code_of_ordinances?nodeId=TITSBULIRE_CH5.12PRBULI_5.12.01ODEPUOPRBU)

## Russell

### Intimate Dealings LLC

**NV Business ID: NV20222429675**

**[info@intimatedealings.com](mailto:info@intimatedealings.com)**

**(623) 335-2646**

**<http://www.intimatedealings.com/>**

**<https://www.crunchbase.com/organization/intimate-dealings-llc>**

**<https://www.linkedin.com/in/russellgreerutah26>**

On Mar 30, 2023, at 12:04 PM, Betty Lawrence <Betty.Lawrence@humboldtcountynv.gov> wrote:

Yes, it is

---

**From:** Intimate Dealings Manager <info@intimatedealings.com>  
**Sent:** Thursday, March 30, 2023 12:03 PM

**To:** Betty Lawrence <Betty.Lawrence@humboldtcountynv.gov>  
**Subject:** Re: Brothel zoning question

Hi, Betty.

I just wanted to confirm that the block we talked about last year is the only place in Humboldt county that allows brothels?

Russell

Intimate Dealings LLC  
**NV Business ID:** NV20222429675  
[info@intimatedealings.com](mailto:info@intimatedealings.com)  
(623) 335-2646  
<http://www.intimatedealings.com/>

On Sep 6, 2022, at 9:15 AM, Betty Lawrence <[Betty.Lawrence@humboldtcountynv.gov](mailto:Betty.Lawrence@humboldtcountynv.gov)> wrote:

Russell – I have attached the assessor’s parcel map reflecting the parcels along with the addresses for each parcel.

*Betty Lawrence*  
Senior Planning Technician

---

**From:** Intimate Dealings Manager <[info@intimatedealings.com](mailto:info@intimatedealings.com)>  
**Sent:** Friday, September 2, 2022 8:59 AM  
**To:** Betty Lawrence <[Betty.Lawrence@humboldtcountynv.gov](mailto:Betty.Lawrence@humboldtcountynv.gov)>  
**Subject:** Re: Brothel zoning question

Good morning,

Is there a street address attached to those blocks? I just am asking so I know what my attorney and I need to call refer to the property as in my lawsuit. Or are they just referred to as block 40 and 41?

Russell

Intimate Dealings LLC  
**NV Business ID:** NV20222429675  
[info@intimatedealings.com](mailto:info@intimatedealings.com)  
(623) 335-2646  
<http://www.intimatedealings.com/>

ZONING AE  
BLOCK 40

APN 15-0151-49, 50, 51, 56, 46

Gilman Development Company LLC  
5 Wild Horse Canyon Dr  
Sparks, NV 89434

01	02	03	04	05	06	07	08	09	10
11	12	13	14	15	16	17	18	19	20
21	22	23	24	25	26	27	28	29	30
31	32	33	34	35	36	37	38	39	40



15-15  
1"=100'  
M.D.B. & M.

HUMBOLDT COUNTY  
SW1/4 SW1/4 SEC. 20, PT SEC. 19 T.36N. R.36E.  
Riverside Add. Winnemucca  
NOTE: This plan is for informational purposes only  
and does not represent a survey of the land on this plan.



15-0151-50 111 Baud St 15-0151-46 139 Baud St  
15-0151-49 117 Baud St 15-0151-51 123 Baud St  
15-0151-56 117 Baud St 15-0151-56 135 Baud St

## Betty Lawrence

---

**From:** Intimate Dealings Manager <info@intimatedealings.com>  
**Sent:** Wednesday, August 31, 2022 6:28 AM  
**To:** Betty Lawrence  
**Subject:** Re: Brothel zoning question

I should clarify: not "unfairly". I misworded that. What he is doing is illegal. NRS 598A forbids monopoly on commerce. I even asked him for a partnership if he didn't want to sell the land and he refused.

So If your city does not want to add more zoning to allow competition and for a company to form a brothel in this state, my LLC is probably pursuing an antitrust lawsuit against Gilman LLC.

Russell

Intimate Dealings LLC  
**NV Business ID:** NV20222429675  
[info@intimatedealings.com](mailto:info@intimatedealings.com)  
[\(623\) 335-2646](tel:(623)335-2646)  
<http://www.intimatedealings.com/>

On Aug 30, 2022, at 4:23 PM, Intimate Dealings Manager <info@intimatedealings.com> wrote:

Hi,

Well, Mr. Gilman is famous for practicing anti-competition laws. For instance, he holds all of the licenses in Storey County.

But yes, one request is a change in the city zoning because Mr. Gilman is unfairly holding the only land that allows brothels and is stifling out other people interested in building better facilities. That's anti-competition. He told me that he will not be selling the property. He always owns a brothel in Storey County. It's unfair for him to have this monopoly.

The other is a request to change the licensing fee costs. For instance, 125 dollars per 100 square feet is excessive.

Russell

Intimate Dealings LLC  
**NV Business ID:** NV20222429675  
[info@intimatedealings.com](mailto:info@intimatedealings.com)  
[\(623\) 335-2646](tel:(623)335-2646)  
<http://www.intimatedealings.com/>

**Betty Lawrence**

---

**From:** Intimate Dealings Manager <info@intimatedealings.com>  
**Sent:** Tuesday, August 30, 2022 4:24 PM  
**To:** Betty Lawrence  
**Subject:** Re: Brothel zoning question

Hi,

Well, Mr. Gilman is famous for practicing anti-competition laws. For instance, he holds all of the licenses in Storey County.

But yes, one request is a change in the city zoning because Mr. Gilman is unfairly holding the only land that allows brothels and is stifling out other people interested in building better facilities. That's anti-competition. He told me that he will not be selling the property. He always owns a brothel in Storey County. It's unfair for him to have this monopoly.

The other is a request to change the licensing fee costs. For instance, 125 dollars per 100 square feet is excessive.

Russell

Intimate Dealings LLC  
NV Business ID: NV20222429675  
[info@intimatedealings.com](mailto:info@intimatedealings.com)  
(623) 335-2646  
<http://www.intimatedealings.com/>

On Aug 30, 2022, at 3:04 PM, Betty Lawrence <Betty.Lawrence@humboldtcountynv.gov> wrote:

What kind of requests? The property owner is the only one who can sell the property. If you are talking about a zone change to another parcel, that will not happen within the City Limits or County.

---

**From:** Intimate Dealings Manager <info@intimatedealings.com>  
**Sent:** Tuesday, August 30, 2022 3:02 PM  
**To:** Betty Lawrence <Betty.Lawrence@humboldtcountynv.gov>  
**Subject:** Re: Brothel zoning question

Hi, Betty.

If Mr. Gilman doesn't want to reach a deal, what is the process of bringing requests in front of the city council of Winnemucca?

Russell

Intimate Dealings LLC  
NV Business ID: NV20222429675

## Betty Lawrence

---

**From:** Intimate Dealings Manager <info@intimatedealings.com>  
**Sent:** Tuesday, August 30, 2022 3:02 PM  
**To:** Betty Lawrence  
**Subject:** Re: Brothel zoning question

Hi, Betty.

If Mr. Gilman doesn't want to reach a deal, what is the process of bringing requests in front of the city council of Winnemucca?

Russell

Intimate Dealings LLC  
**NV Business ID:** NV20222429675  
[info@intimatedealings.com](mailto:info@intimatedealings.com)  
[\(623\) 335-2646](tel:(623)335-2646)  
<http://www.intimatedealings.com/>

On Aug 26, 2022, at 9:09 AM, Intimate Dealings Manager <info@intimatedealings.com> wrote:

Hey, Betty.

I understand. One last question, I see the different plots are 0.18 ac, etc. All together, how many square feet are blocks 40 and 41? I can calculate it, I want to make sure my calculations match what the city has.

And supposing my LLC reaches a deal with Gilman LLC, I notice there's a dirt road area behind the blocks, next to the freeway. Is that a city road and would they be willing to make that a road that leads to blocks 40 and 41?

Russell Greer

Intimate Dealings LLC  
**NV Business ID:** NV20222429675  
[info@intimatedealings.com](mailto:info@intimatedealings.com)  
[\(623\) 335-2646](tel:(623)335-2646)  
<http://www.intimatedealings.com/>

On Aug 26, 2022, at 7:46 AM, Betty Lawrence  
<Betty.Lawrence@humboldtcountynv.gov> wrote:

We do not have that information

**From:** Intimate Dealings Manager <info@intimatedealings.com>  
**Sent:** Thursday, August 25, 2022 6:15 PM  
**To:** Betty Lawrence <Betty.Lawrence@humboldtcountynv.gov>  
**Cc:** Alicia Heiser <manager@winnemuccacity.org>  
**Subject:** Re: Brothel zoning question

Betty,

Thank you so much for your reply. Do you by chance have an email or phone on file for Gilman LLC? I only see the mailing address.

Thanks,

Russell Greer

Intimate Dealings LLC  
NV Business ID: NV20222429675  
[info@intimatedealings.com](mailto:info@intimatedealings.com)  
(623) 335-2646  
<http://www.intimatedealings.com/>

On Aug 25, 2022, at 4:25 PM, Betty Lawrence  
<[Betty.Lawrence@humboldtcountynv.gov](mailto:Betty.Lawrence@humboldtcountynv.gov)> wrote:

Mr. Greer – I have attached the assessor’s parcel map reflecting Blocks 40 and 41. I have also included a GIS image showing the area. The lines are a little off but you can compare the image to the map. The property is currently vacant except for a brick/concrete structure. All of the other buildings that were on the property were demolished by the property owner, Gilman Development Co LLC. I have provided the contact information for Mr. Gilman. I do not believe the City would be interested in located a brothel anywhere else, which would require a zone change. No zoning would allow this type of business with a conditional use permit. Brothels have been in this location for over 50 years.

*Betty Lawrence*  
Senior Planning Technician

**From:** Intimate Dealings Manager <[info@intimatedealings.com](mailto:info@intimatedealings.com)>  
**Sent:** Thursday, August 25, 2022 2:43 PM  
**To:** Betty Lawrence <[Betty.Lawrence@humboldtcountynv.gov](mailto:Betty.Lawrence@humboldtcountynv.gov)>  
**Subject:** Brothel zoning question

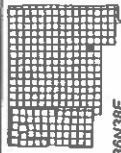
Hi, Betty

ZONING AE  
BLOCK 40

APN 15-0151-49, 50, 51, 56, 46

Gilman Development Company LLC  
5 Wild Horse Canyon Dr  
SPARKS, NV 89434

01	02	03	04	05	06	07	08	09	10
11	12	13	14	15	16	17	18	19	20
21	22	23	24	25	26	27	28	29	30
31	32	33	34	35	36	37	38	39	40



HUMBOLDT COUNTY

SW1/4 SW1/4 SEC. 20, PT. SEC. 19 T.36N. R.38E.

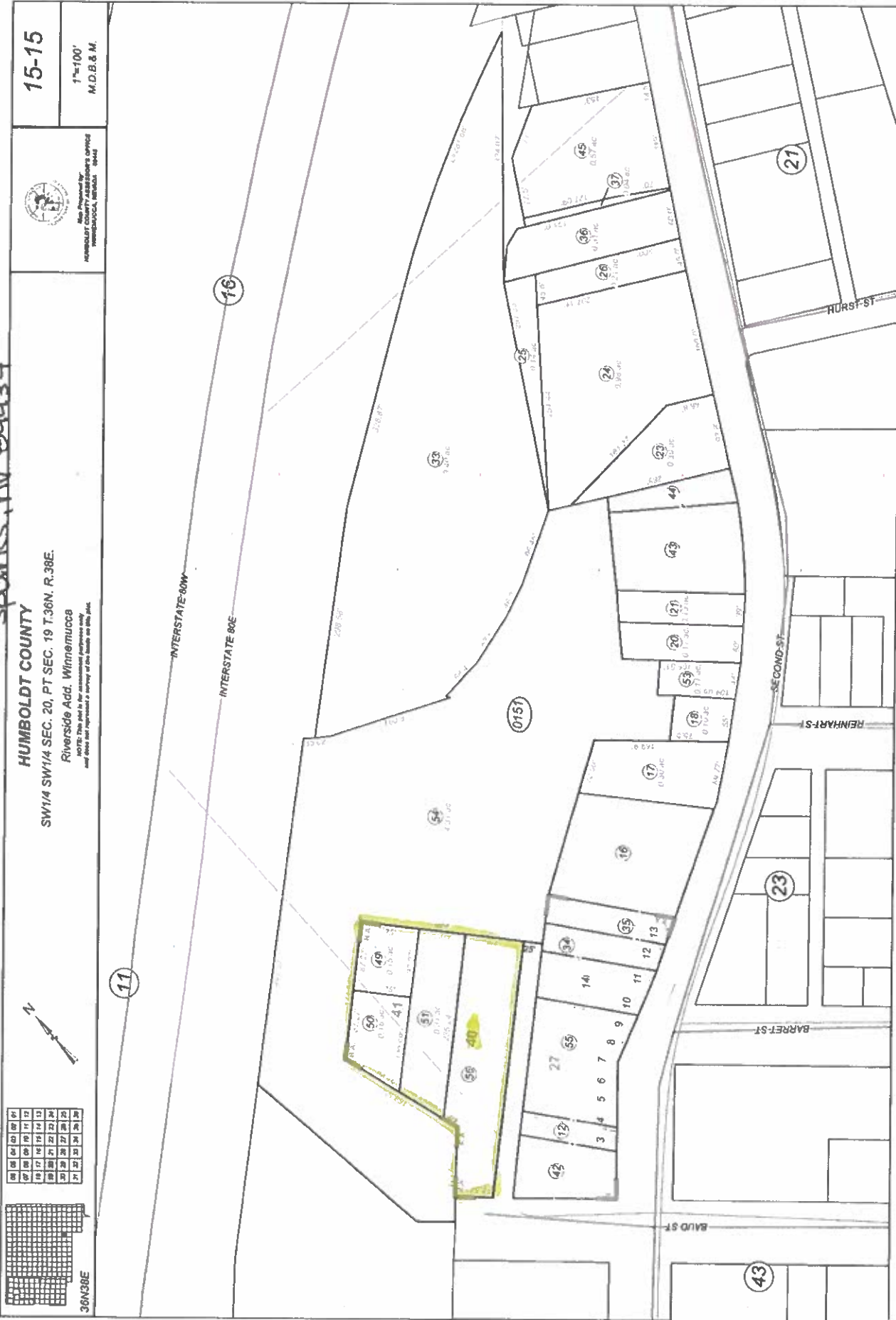
Riverside Add. Winnemucca

NOTE: This plan is for assessment purposes only and does not represent a survey of the lands on this plan.



15-15

1"=100'  
M.D.B.&M.



15-0151-50 111 Baud St  
 15-0151-49 117 Baud St  
 15-0151-51 123 Baud St  
 15-0151-56 135 Baud St  
 15-0151-46 139 Baud St



I emailed an email address belonging to you back in May, but I guess it was the wrong one, so I wanted to try this.

My name is Russell and I am with a real estate development company that is interested in building a brothel in Winnemucca. Upon reading 17.110.010 of the Winnemucca Code, it says brothels can only be in blocks 40 and 41.

Where exactly are those blocks on a map of Winnemucca? Is that where Marks Automatic Transmission, etc is at? If so, it appears that area is occupied with non-sex work businesses. Are all of blocks 40 and 41 taken with private land?

Would the city or the code allow for a conditional use permit for a brothel to be built elsewhere in Winnemucca? After all, that particular ordinance was passed in 1996, so it's a bit dated.

Please let me know what our options are.

Thanks,

Russell Greer

Intimate Dealings LLC  
**NV Business ID:** NV20222429675  
[info@intimatedealings.com](mailto:info@intimatedealings.com)  
[\(623\) 335-2646](tel:6233352646)  
<http://www.intimatedealings.com/>

RICHARD STONE, Mayor  
ANDREW LINDSEY, Council Seat 1  
THERESA L. MAVITY, Council Seat 2  
VINCE MENDIOLA, Council Seat 3  
ASHLEY MADEN, Council Seat 4  
LYNDSEE JIMENEZ, Council Seat 5



Alicia E. Heiser, PhD, PE, Manager/Engineer (775) 623-6333  
Ruth Fitzpatrick, Clerk/Treasurer (775) 623-6333  
Mike Rangel, Police Chief (775) 623-6396  
Fernando Vega, Public Works Supervisor (775) 623-6381  
Tom Heikkila, Parks and Recreation (775) 623-6325  
Levi Carl, Building Inspector (775) 623-6319  
Fax Number (775) 623-6090  
E-Mail winnemucca@winnemuccacity.org



## CITY COUNCIL MEETING AGENDA

**MEETING DATE:** Tuesday, May 6, 2025 – regular meeting  
**MEETING TIME:** 1:00 p.m.  
**MEETING PLACE:** Winnemucca City Hall, 90 W. Fourth Street, Winnemucca, Nevada  
**PLACES POSTED:** Winnemucca City Hall, 90 W. Fourth Street, Winnemucca, Nevada  
Humboldt County Library, 85 E. Fifth Street, Winnemucca, Nevada  
Humboldt County Courthouse, 50 W. Fifth Street, Winnemucca, Nevada  
[www.winnemuccacity.org](http://www.winnemuccacity.org) <https://notice.nv.gov>  
**PERSON POSTING:** Olga Luna

### MEETING VIA TELECONFERENCE OR VIDEOCONFERENCE OR IN-PERSON THE TELECONFERENCE AND VIDEOCONFERENCE ACCESS INSTRUCTIONS APPEAR BELOW

- A. **CALL TO ORDER-QUORUM DETERMINATION**
- B. **PUBLIC COMMENT-PERSONAL COMMUNICATION-CORRESPONDENCE** (This period is for comments by the public and for the Mayor, Council and City Staff to present correspondence, communications or comments. No action may be taken upon a matter presented under this section until it is placed on an agenda for action. Public comment is generally limited to three (3) minutes per person.)
- C. **PROCLAMATIONS-AWARDS-PRESENTATIONS** (The Mayor, Council, City Staff or an invitee may make a proclamation, present a service or other award on behalf of the city or make an informational presentation of interest to the community. No action may be taken upon an item in this section.)
- D. **BUSINESS IMPACT DETERMINATION** (The Council must take action pursuant to NRS Chapter 237 and make a determination if any agenda item proposes the adoption of any rule which would have a direct and significant economic burden upon a business or directly restrict the formation or expansion of a business by imposing, increasing or changing the basis for the calculation of a fee that is paid in whole or in substantial part by a business.)
- E. **CONSENT AGENDA** (The agenda items in this section are for discussion and possible action unless otherwise noted. All items may be acted upon in a single motion; however, upon Council member request, any consent agenda item may be discussed and acted upon separately.)
  - 1. **Meeting Minutes**  
April 22, 2025 City Council regular meeting minutes
  - 2. **Warrants-Expenses**  
Warrants, expenses, claims and payroll items for the period ending prior to this meeting
- F. **BUSINESS ITEMS DISCUSSION-ACTION** (The agenda items in this section are for discussion and possible action unless otherwise noted. The action may consist of approval, disapproval, acceptance, rejection, authorization, adoption, review, recommendation, referral to staff, or any other action as appropriate. The items may be heard in any order and at any time unless a time

*100 Years of Community Service, Pride, and Success*

**CITY COUNCIL MEETING AGENDA**

**May 6, 2025**

**Page 2 of 3**

is specified; if a time is specified, the time may be the approximate time; two or more items may be combined for consideration; an item may be removed from the agenda; or discussion relating to an item may be delayed at any time.)

**1. Administration – Mural Concept Proposal**

Proposal for the mural art concept to be painted on the city-owned old fire house building located at 445 S. Bridge Street / Main Street-Hammond

**2. Administration-Planning – Zoning District Expansion Request**

Request to expand the Adult Entertainment zoning district to include the Scott Shady Court Motel property located at 400 W. First Street, APN 15-0132-18 / Greer

**3. Administration-Airport – Grant Proposal**

Request for authorization to submit a FAA grant application for the phase I construction, engineering, inspection, and administrative costs for the aircraft heavy ramp reconstruction project at the municipal airport / Staff

**4. Administration – Spay-Neuter Program**

Proposals for reforming, administering and controlling costs of the City-County spay neuter program / Staff

**5. Administration – American Rescue Plan Funds**

Report on the American Rescue Plan Act (ARPA) funds expenditures and status of ARPA-funded projects / Staff

**6. Administration – Bode Howard Memorial Pool-New Aquatics Center**

Proposals, studies, and reports for developing a plan for abandoning the existing Bode Howard Memorial Pool and options for funding and developing a new aquatics center / Staff

**G. STAFF-COUNCIL REPORTS** (This period is for receiving reports, information, department updates, board and committee updates and proposals by the Council and City staff. No action may be taken upon a matter raised under this section until it is placed on an agenda for action.)

1. Mayor and Council / City Manager / Administration
2. Police Department / Public Safety / Fire Department
3. City Attorney / Municipal Court / Judicial
4. Public Works / Sewer and Water Departments / Street Department
5. Planning Department / Building Department
6. Recreation Department / Parks / Golf Course
7. Capital Improvement

**H. PUBLIC COMMENT** (This period is for comments by the public. No action may be taken upon a matter raised under this section until it is placed on an agenda for action. Public comment is generally limited to three (3) minutes per person.)

**NOTICE:** Staff reports and supporting material for the meeting are available to the general public at the same time the materials are provided to the City Council by contacting the City Clerk in person at the Winnemucca City Clerk's Office located in the City Hall, 90 W. Fourth Street, Winnemucca, Nevada or by telephone at 775-623-6338 or by electronic mail at rfitzpatrick@winnemuccacity.org. The City Clerk is the designated person from whom a member of the public may request the supporting material for the meeting and contacting the City Clerk's Office is the only means by which the supporting material is available to the public.

**NOTICE:** Members of the public may make a public comment at the meeting without being physically present by emailing the City Manager at: manager@winnemuccacity.org before 5:00 p.m. on the business day prior to the day of the meeting. The emailed messages received will be provided to the City Council for review and, upon request, transcribed for entry into the record. The meeting may be accessed for participation and/or making public comment via: (i) **teleconference (audio only) by dialing 1-650-419-1505 using access code 398659008 and dial-in password 94662489** or (ii) **videoconference connection (audio and video) through RingCentral by entering or pasting the following URL address into a browser with Internet access or by clicking on the following link:**

<https://v.ringcentral.com/join/398659008?pw=11208d9b5de17e052e28c07e8086f9bb>

The meeting ID or access code: 398659008

The meeting password is: WinnCity (94662489 from phones and video systems)

**CITY COUNCIL MEETING AGENDA**  
**May 6, 2025**  
**Page 3 of 3**

**NOTICE:** The City Council may by law receive information from legal counsel regarding potential or existing litigation involving a matter over which the City Council has supervision, control, jurisdiction or advisory power, and such gathering does not constitute a meeting of the City Council.

**NOTICE:** Reasonable efforts will be made for members of the public who require special assistance or accommodation to participate in the meeting. Please contact the City Clerk by telephone at 775-623-6338 or by electronic mail at rfitzpatrick@winnemuccacity.org or the City Manager by telephone at 775-623-6333 or by electronic mail at manager@winnemuccacity.org or TDD 775-623-6439 one (1) business day in advance of the meeting to make arrangements.

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident. Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible Agency or the USDA TARGET Center at (202) 720-2600 (voice and TTY) or USDA through the Federal Relay Service at (800) 877-8339. Program information may be made available in languages other than English. To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, which is available and accessed online at [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html) and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov)

**NOTICE:** This agenda has been physically posted at the locations noted above and electronically posted at [www.winnemuccacity.org](http://www.winnemuccacity.org) and at <https://notice.nv.gov/> prior to 9:00 am three or more working days before the scheduled meeting.

POSTED BY:(PR NT NAME) Olga Luna SIGNATURE: \_\_\_\_\_

TITLE: Administrative Assistant DATE: May 1, 2025 TIME: \_\_\_\_\_



**From:** Russell Greer russmark@gmail.com  
**Subject:** Stop  
**Date:** May 12, 2025 at 1:09 PM  
**To:** hardinlawpllc@icloud.com

---

Sir,

Why do you continue to pursue irrelevant things?

It was indeed a business meeting I was there. Also a city meeting too. The fact that you even found out about this city meeting only proves that your client's site stalks me

I am pursuing sanctions against you for abusing this. This has no relevancy to this case.

Sent from my iPhone

**From:** Russell Greer russmark@gmail.com  
**Subject:** Re: Public Records Request  
**Date:** May 12, 2025 at 1:03 PM  
**To:** Betty Lawrence Betty.Lawrence@humboldtcountynv.gov  
**Cc:** Matthew Hardin hardinlawpllc@icloud.com, Anthony Gordon Anthony.Gordon@humboldtcountynv.gov

RG

Hi, Betty

Just so you aware, Mr. Hardin is an attorney for a stalking site called kiwi farms that has been trying to sabotage my life.

Kiwi farms have been linked to three suicides and I'm currently trying to pursue criminal charges against the owner, Joshua moon, for stalking me

Sent from my iPhone

On May 12, 2025, at 9:00 AM, Betty Lawrence <Betty.Lawrence@humboldtcountynv.gov> wrote:

Good morning – Per your request, I have attached the e-mails between myself and Mr. Greer beginning August 25, 2022 to August 10, 2023. I have included one from Jessica Smith with the GIS department only because I reference this e-mail in my e-mail of 8/10/2023 to Mr. Greer.

Betty Lawrence  
Senior Planning Technician

---

**From:** Matthew Hardin <hardinlawpllc@icloud.com>  
**Sent:** Monday, May 12, 2025 8:10 AM  
**To:** Betty Lawrence <Betty.Lawrence@humboldtcountynv.gov>  
**Cc:** Russell Greer <russmark@gmail.com>  
**Subject:** Public Records Request

Good morning, Ms. Lawrence.

Pursuant to the Nevada Public Records Act, I hereby request copies of any email correspondence in your custody, which email correspondence:

- 1) Is to or from an individual named Russell Greer; and
- 2) Relates to the topic of adult entertainment or prostitution; and
- 3) Is dated at any time within the past four calendar years.

Pursuant to *Las Vegas Review Journal v. Clark County School District*, 134 Nev. Adv. Op. 84 (2018), I wish to inform you that there is extensive public interest in the release of these documents. Specifically, Mr. Greer appears to be a prolific advocate for prostitution in rural communities across Nevada and elsewhere, and also a prolific litigant in the federal and state courts on topics both related and unrelated to prostitution. Mr. Greer is also documented to have a misdemeanor conviction arising from inappropriate behavior towards one woman in Utah, and has been the subject of at least three separate personal protection or restraining orders, all of which arise from further allegations of unlawful behavior towards women. Additionally, Mr. Greer appears to have made representations to the U.S. District Court for the District of Utah on May 2, 2025 that he could not attend a virtual hearing scheduled in that Court on May 6, 2025 because he would be attending an “emergency” meeting of the Winnemucca City Council of which he did not have advance notice, apparently with reference to a topic on which he has communicated with you and perhaps other Humboldt County officials regarding various lots in Winnemucca.

Public records you might release in response to this request will shed light not only on Mr. Greer's broader advocacy for the expansion of prostitution in Humboldt County and his behavior towards women, but will also shed light on the extent to which Mr. Greer has been honest or dishonest to the federal court in Utah.

Thank you for your prompt attention to this request. Please let me know if you need any further information from me to facilitate your search for records or to evaluate the extent of the public interest in their release. On information and belief, Mr. Greer may have used [russmark@gmail.com](mailto:russmark@gmail.com) or [russellgreer27@icloud.com](mailto:russellgreer27@icloud.com) to communicate with you.

Thank you,

**Matthew D. Hardin**  
**Hardin Law Office**  
Direct Dial: 202-802-1948  
NYC Office: 212-680-4938  
Email: [MatthewDHardin@protonmail.com](mailto:MatthewDHardin@protonmail.com)

<Records Request-Greer.pdf>



MH

**From:** Matthew Hardin matthewdhardin@gmail.com  
**Subject:** Public Records Act Request  
**Date:** May 10, 2025 at 11:12 AM  
**To:** kent@winnemuccalaw.com  
**Cc:** manager@winnemuccacity.org  
**Bcc:** Joshua Moon jcmoon@pm.me

Good morning,

Pursuant to the Nevada Public Records Act, I hereby request copies of any email correspondence in the custody of any member of the City Council, or any member of the City Manager's Office, or any member of the City's staff, which email correspondence:

- 1) Is to or from an individual named Russell Greer; and
- 2) Relates to Item # (F)(2) of the May 6, 2025 City Council Meeting, or to the topic of adult entertainment or prostitution; and
- 3) Is dated any time during calendar year 2025.

Pursuant to *Las Vegas Review Journal v. Clark County School District*, 134 Nev. Adv. Op. 84 (2018), I wish to inform the City that there is extensive public interest in the release of these documents. Specifically, Mr. Greer appears to be a prolific advocate for prostitution in rural communities across Nevada and elsewhere, and is also a prolific litigant in the federal and state courts on topics both related and unrelated to prostitution. Mr. Greer is also documented to have a misdemeanor conviction arising from inappropriate behavior towards one woman in Utah, and has been the subject of at least three separate personal protection or restraining orders, all of which arise from further allegations of unlawful behavior towards women. Additionally, Mr. Greer appears to have made representations to the U.S. District Court for the District of Utah on May 2, 2025 that he could not attend a virtual hearing scheduled in that Court on May 6, 2025 because the Winnemucca meeting was an "emergency" of which he did not have advance notice.

Public records you might release in response to this request will shed light not only on Mr. Greer's broader advocacy for the expansion of prostitution and his behavior towards women, but will also shed light on the extent to which Mr. Greer has been honest or dishonest to the federal court in Utah. Specifically, the date on which Mr. Greer was informed that the Winnemucca City Council would hear his request on May 6, 2025 is relevant, because if Mr. Greer had notice at any time prior to May 2, 2025 that he would appear at the Winnemucca City Council meeting, that would indicate Mr. Greer was dishonest in his representations to the court that the Winnemucca meeting was an "emergency."

Thank you for your prompt attention to this request. Please let me know if you need any further information from me to facilitate your search for records or to evaluate the extent of the public interest in their release.

**Matthew D. Hardin**

**Hardin Law Office**

Direct Dial: 202-802-1948

NYC Office: 212-680-4938

Email: MatthewDHardin@protonmail.com