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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JANE DOE,

Plaintiff

v.

LOMBARDO ET AL,

Defendants

PROPOSED INTERVENOR'S REPLY TO
DOC 142

Case No.: 3:24-cv-00065-MMD-CSD

Proposed Intervenor Russell Greer comes now and replies:

PLAINTIFF’S COUNSEL CONTINUES TO SPREAD FALSITIES.

BOLSTERING THE NEED FOR A HEARING

After this Court entered its 10-18-24 Order, in which the Court ruled the Jane Doe didn’t have a private cause of action under the 13th Amendment, Plaintiff’s Counsel, the National Center on Sexual Exploitation, wrote on their X (formerly Twitter) account: “*The NCOSE law center is fighting against **state-enabled** sex trafficking through Nevada brothels. This is the SECOND lawsuit the NCOSE law center has filed against the state of Nevada for its **exploitative practices**. How many more Jane Does must suffer sexual exploitation before the system is reformed to prioritize their safety?*” It was posted on 10-23-24. One of the hashtags used was “**#13thamendment**”. **EXHIBIT A.**

The posting was then liked by 17 people and shared 7 times, spreading the falsity further.

Proposed intervenor couldn’t have asked for a better example to use in rebuttal to Plaintiff’s response because it illustrates the need for a hearing. If the Court didn’t catch the details in the X post, Plaintiff’s Counsel is spreading fear by repeating claims that this Court ruled against:

1. This Court ruled that the government defendants aren’t enabling any alleged trafficking.
2. This Court ruled that Nevada’s practices aren’t exploitative and did not contribute to alleged trafficking by private brothels.
3. The Court ruled Jane Doe has no private right to pursue damages under the 13th Amendment.

Although the motion for a hearing was filed in regards to Mr. Guinasso’s actions, it appears the NCOSE is now doing the same thing of creating hysteria among gullible people.

It needs to STOP, hence why a hearing is warranted. It crosses into contempt of court territory for these lawyers (it's their organization's law center social media account) to publish claims that this very Court ruled against.

There's no other way for those fires to have started than by gullible members of the public who read these Twitter postings and these op-eds and who get whipped into a panic that brothel owners are slave owners.

Mr. Guinasso Clearly Violated FRCP Rule 11

Protest as Plaintiff might, the fact remains: Mr. Guinasso signed his signature on this third, identical complaint, alleging Nevada's brothel laws are enabling trafficking and then chose to try doing a media campaign (which fell flat on its face). Only gullible people shared the Guinasso/NCOSE PR stunt.

Mr. Guinasso could have just used this third lawsuit to sue the four private brothels, but he didn't. He insisted on repeating twice dismissed claims of state-sanctioned trafficking.

Mr. Guinasso's Actions Fall Under FRCP 11 Conduct

FRCP Rule 11(b) reads::

“By presenting to the court a pleading, written motion, or other paper—whether by signing, filing, submitting, or later advocating it—an attorney or unrepresented party certifies that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- (1) it is not being presented for any improper purpose, such as to harass;
- (2) the claims, defenses, and other legal contentions are warranted by existing law
- (3) the factual contentions have evidentiary support.”

Clearly, Guinasso, an attorney, violated 1,2, and 3 by filing this Complaint.

Improper purposes

As shown in the Motion for Hearing, Guinasso has an odd obsession with trying to outlaw brothels and so clearly this Complaint was used to harass the State and County officials, to try making the elected officials look bad by showing that they are condoning “trafficking”. He added the private parties as a bonus to squeeze money out of them.

Claims Not Warranted by Law

As explained, Guinasso’s previous case of *Williams v. Sisolak* (D. Of Nevada 2022) was found that the 13th Amendment doesn’t allow private causes of action and that the State wasn’t enabling the trafficking. So there was no existing law that allowed Guinasso to reasonably sue the government defendants for a third time.

No Factual Support

The factual support Guinasso relied on, was previously called “tentative” by this District and the 9th Circuit also dismissed Guinasso’s appeal from that District Court’s ruling.

The Reasonable Lawyer Standard

As stated in the motion for a hearing, no other Nevada attorney is suing the brothels or the state of Nevada for trafficking in the brothels, thus setting up the reasonable lawyer standard, which is: “whether a reasonable attorney admitted to practice before the district court would file such a document.” *Predator Int’l, Inc. v. Gamo Outdoor USA, Inc.*, 793 F.3d 1177, 1182 (10th Cir. 2015).

Hysteria Making It Hard to Campaign

As stated in the motion to intervene that Greer filed, his interests in this case are of that of a “sex buyer”, yes, but also because Guinasso’s falsely repeated, duplicated claims are creating an environment hard to campaign in. Just today, a county commissioner strongly opposed Greer’s efforts to try lobbying the commission Board of a certain county to legalize prostitution in their County. **EXHIBIT B.** Before the lies spread in this case, Nevada was seen as the live free and let

live state; a state that embraced its vices. The more Guinasso and co-lawyers continue to Tweet and publish false stories, the more it's harder to improve the industry by expanding territory.

Conclusion

Plaintiff said nothing in her Response to warrant this Court to not have a hearing. In fact, this Reply only shows the need to stop Plaintiff's counsel from continuing to spread false information.

Respectfully

DATED: October 24th, 2024

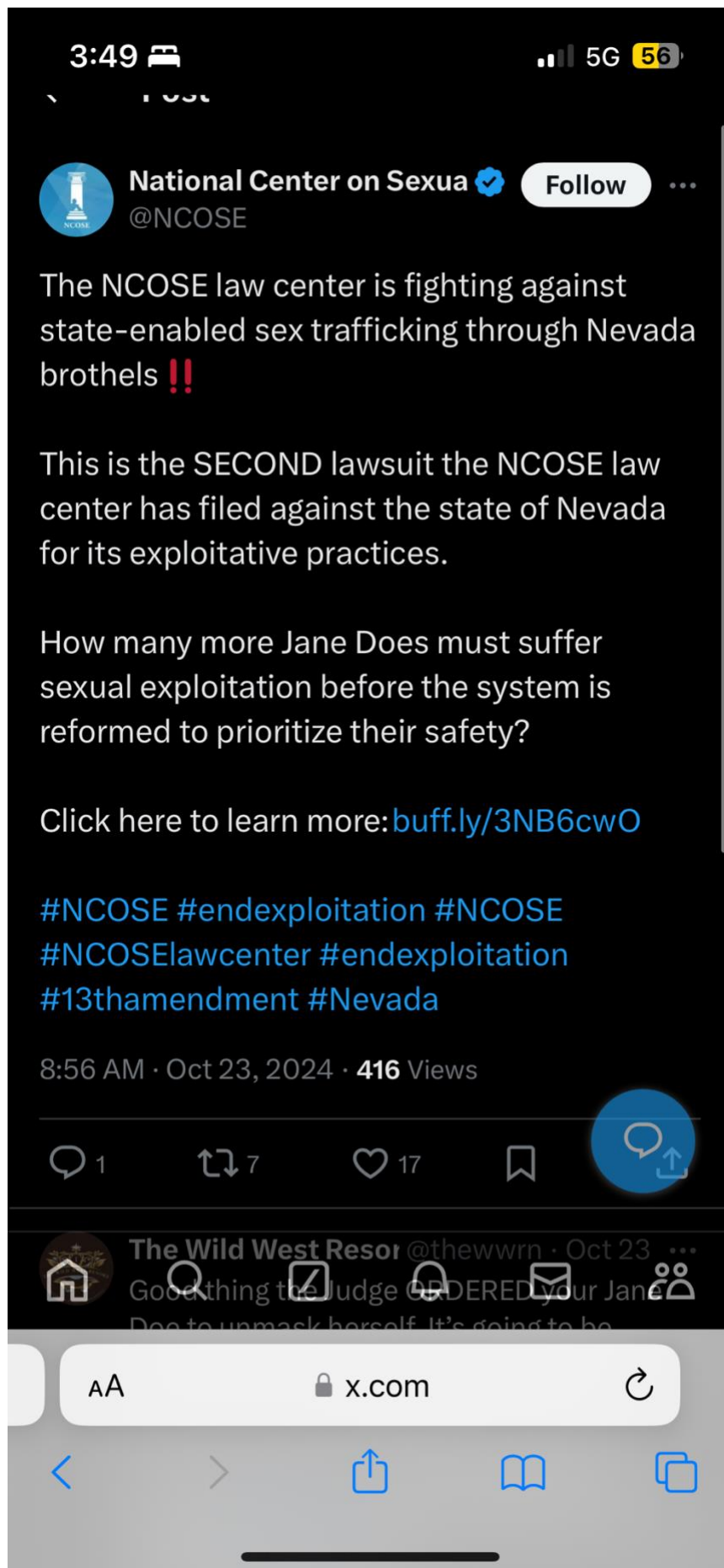
Russell Greer

Pro Se

CERTIFICATE OF SERVICE:

Pursuant to FRCP 5(b), I certify that on September 24th, 2024, I served a true and correct copy of the attached document by Electronic Mail to all attorneys.

EXHIBT A



EXHIBT B

