

DISTRICT COURT, BOULDER COUNTY, COLORADO Court Address: Boulder County Combined Court 1777 6th St., Boulder, CO 80302 Tel: 303-441-3750	DATE FILED: December 27, 2018 9:59 AM FILING ID: DB41324E4EF5E CASE NUMBER: 2018CV31172
Plaintiff: GAIA, INC. v. Defendants: PATTY GREER ROCHE A/K/A PATTY GREER, AN INDIVIDUAL, AND GREER FILMS LLC D/B/A PATTY GREER FILMS	ΔCOURT USE ONLYΔ Case No. Div. Ctrm.
<i>Attorneys for Plaintiff Gaia, Inc.</i> Lester C. Houtz (Atty. Reg. No. 20165) Bartlit Beck LLP 1801 Wewatta Street, Suite 1200 Denver, Colorado 80202 Phone: 303-592-3100 FAX: 303-592-3140 Email: les.houtz@bartlit-beck.com	
COMPLAINT AND JURY DEMAND	

Plaintiff GAIA, INC., by and through its attorneys, Bartlit Beck LLP, for its Complaint against Defendants PATTY GREER ROCHE a/k/a PATTY GREER and GREER FILMS LLC d/b/a PATTY GREER FILMS, alleges as follows:

NATURE OF THE ACTION

1. This is an action to recover damages from Defendants for malicious tortious acts of defamation and to enjoin Defendants from further causing harm to Plaintiff through publication of defamatory statements.

PARTIES

2. Plaintiff Gaia, Inc. ("Gaia") is a Colorado corporation with its principal place of business located at 833 W. South Boulder Road, Louisville, Colorado, 80027. Gaia is a global

conscious media and community company that operates a global digital video subscription service that caters to a unique and under-served subscriber base. Gaia is a rapidly growing company with a digital content library of over 8,000 titles available to subscribers.

3. Upon information and belief, Defendant Patty Greer Roche a/k/a Patty Greer (“Greer”) is an individual living in Boulder, Colorado.

4. Defendant Greer Films LLC (“Greer Films”) is a Colorado limited liability company with its principal place of business listed as 350 East St., Nederland, Colorado, 80466. Greer is listed as the registered agent for Greer Films. Upon information and belief, Greer Films is currently doing business as Patty Greer Films and operates the website <https://cropcirclefilms.com> (the “Greer Site”).

5. Gaia filed a previous action against Greer and Greer Films bringing claims arising from the same facts at issue in this case. The previous case was filed in the District Court, County of Boulder, as Case No. 18CV30757. The process server attempted to serve the complaint on Greer and Greer Films, but was not able to find them at any of the addresses where they were purportedly located. Greer’s attorney did not agree to accept service of the complaint on behalf of Greer. In the course of discussions between counsel, Gaia’s counsel informed Greer’s counsel that Gaia would be filing a new complaint if the original complaint was dismissed for lack of service.

6. On December 14, 2018, the Court dismissed Gaia’s initial complaint for lack of service, without prejudice to Gaia’s right to refile the complaint at a later date if necessary. Gaia now is refiling its claims and intends to vigorously pursue those claims in litigation.

JURISDICTION AND VENUE

7. Jurisdiction is proper in this Court because Plaintiff Gaia has suffered injury as a result of Defendants' commission in Colorado of tortious acts of publishing defamatory statements about Gaia.

8. Venue is proper in Boulder County pursuant to Colorado Rules of Civil Procedure, Rule 98(c)(1) because Defendants reside in Boulder County.

FACTUAL ALLEGATIONS

Overview

9. Starting at least as early as September 2017, and recently intensifying in nature and degree, Defendants embarked on a calculated and malicious course of conduct designed to attack Gaia's business and its professional reputation. Defendants' actions were intended to publicly humiliate, harass, threaten, and harm Gaia and its employees.

10. Defendants conducted their attacks on Gaia by fabricating accusations of illegal and immoral conduct and posting those fabrications on the internet in numerous videos, both on the Greer Site, and various other sites (sometimes with the assistance of others not named as defendants in this action).

11. The Greer Site and the other sites on which Defendants disseminated their fabricated accusations are publicly available and have been viewed by an unknown number of third-parties, including Gaia's business partners and potential customers.

12. Defendants have continued their attacks despite Gaia requesting that Greer take down the defamatory statements and cease and desist making any further defamatory statements.

Background Between the Parties

13. Gaia entered into a contract with Greer to distribute certain of her films through its global digital video subscription service (the "Distribution Contract").

14. Gaia paid Greer an advance of \$10,000 on future royalties for distribution and display of the subject films (the "Advance Payment").

15. Due to a low level of interest by Gaia's subscribers in Greer's films, Gaia never recouped the Advance Payment. Accordingly, pursuant to the terms of the Distribution Contract, Gaia never owed Greer any further royalty payments.

16. Upon information and belief, as a result of the lack of interest in Greer's films and lack of corresponding royalty payments, Greer sought to re-acquire the rights to the films that were subject to the Distribution Contract.

17. In response, Gaia requested that Greer return a portion of the Advance Payment as a condition of terminating the Distribution Contract and returning to Greer the rights in her films.

18. Thereafter, Gaia and Greer entered into negotiations for an agreement by which Greer would be able to buy back the rights to her films. The deal was never finalized, and Greer did not make any payments to Gaia. Accordingly, pursuant to the Distribution Contract, Gaia continues to have rights to certain of Greer's films.

The Defamatory Statements

19. Upon information and belief, Greer developed a vendetta against Gaia in response to the public's lack of interest in her films, the absence of royalties she earned, and her inability to come to an agreement with Gaia to terminate the Distribution Contract.

20. Upon information and belief, Greer pursued her malicious vendetta by knowingly spreading false statements about Gaia through a barrage of video interviews and "vlog" (video blog) posts.

21. Initially, Greer's statements primarily concerned the films that were the subject of the Distribution Contract and disparaged Gaia's business.

22. But over time, Greer's statements became increasingly bizarre, offensive, hostile, and defamatory.

Video A – July 12, 2018

23. Upon information and belief, Greer is one of the speakers in a video titled "GAIA TV IMPLODING, What's Next? Part 1 – Sarah Westall, Patty Greer, Laura Eisenhower" ("Video A").

24. Upon information and belief, Video A was recorded on or about July 12, 2018.

25. Upon information and belief, Greer published Video A on the Greer Site on July 20, 2018, in a post titled "GAIA TV IMPLODING, What's Next? Part 1 - Sarah Westall, Patty Greer, Laura Eisenhower" ("Posting A"; a printout of the post is attached as Exhibit A).

Video A – Satanists and Luciferians Statements

26. At approximately 1:47-2:25 of Video A, Sarah Westall states that **"[w]e're going to talk about Gaia Television . . . There is the notion that the CEO and other leadership in the company are Luciferians, that they are Satanists. They have lately been promoting the Luciferian agenda and Satanism in their shows over the last year."** ("Defamatory Statement A1").

27. At approximately 16:25-16:37 of Video A, Sarah Westall states that **"the CEO of Gaia is a Luciferian. And he's becoming very bold at integrating it into the latest shows, to the point where it's becoming obvious that's his agenda."** ("Defamatory Statement A2").

28. At approximately 18:29-18:33 of Video A, Sarah Westall states that **"[s]o there's a group with inside of Gaia who are Satanists or Luciferians."** ("Defamatory Statement A3").

29. At approximately 28:18-28:50 of Video A, Greer repeats an allegation from a letter or email written by a purportedly anonymous person in stating about Gaia that **"Denver**

Luciferian coven equals CIA front CEO equals reptile worshiper. Reptile energy.”
 (“Defamatory Statement A4”).

30. Defamatory Statement A1, Defamatory Statement A2, Defamatory Statement A3, and Defamatory Statement A4 (collectively, the “Video A Satanist Statements”) are false statements of fact.

31. Defendants intentionally published the Video A Satanist Statements to the Greer Site.

32. Defendants knew that the Video A Satanist Statements were false or recklessly disregarded the falsity of the statements, and published them with malice and with the intent to cause harm to Gaia.

33. The Video A Satanist Statements are injurious and defamatory *per se*, in that they are specifically directed at Gaia and the defamatory meaning is apparent from the face of the statements without the aid of extrinsic proof. The Video A Satanist Statements accuse Gaia and its CEO of promoting a Luciferian agenda and Satanism, and they directly injure Gaia’s business and professional reputation.

Video A – Hacking Statements

34. At approximately 18:53-18:59 of Video A, Sarah Westall states that Gaia **“just really did a number on [Greer’s] films, on your body, on your physical nature.”** (“Defamatory Statement A5”).

35. At approximately 24:36-24:38 of Video A, Greer states that Gaia was **“going to continue hacking me.”** (“Defamatory Statement A6”).

36. At approximately 33:53-33:56 of Video A, Greer repeats an allegation from a letter or email written by a purportedly anonymous person in stating about Gaia that the **“CEO has non-Gaia spooks to hack you.”** (“Defamatory Statement A7”).

37. At approximately 37:28-37:41 of Video A, Greer states that Gaia has **“an agency of spooks hacking me for all these years . . . and the first hack in 2013 . . . they haven’t stopped.”** (“Defamatory Statement A8”).

38. Defamatory Statement A5, Defamatory Statement A6, Defamatory Statement A7, and Defamatory Statement A8 (collectively, the “Video A Hacking Statements”) are false statements of fact.

39. Defendants intentionally published the Video A Hacking Statements to the Greer Site.

40. Defendants knew that the Video A Hacking Statements were false or recklessly disregarded the falsity of the statements, and published them with malice and with the intent to cause harm to Gaia.

41. The Video A Hacking Statements are injurious and defamatory *per se*, in that they are specifically directed at Gaia and the defamatory meaning is apparent from the face of the statements without the aid of extrinsic proof. The Video A Hacking Statements accuse Gaia of illegally attacking Greer and her property, and they directly injure Gaia’s business and professional reputation.

Video A – SEC Investigation Statement

42. At approximately 29:49-29:13 of Video A, Sarah Westall states that **“[t]he SEC is investigating [Gaia].”** (“Defamatory Statement A9” or the “Video A SEC Statement”).

43. The Video A SEC Statement is a false statement of fact.

44. Defendants intentionally published the Video A SEC Statement to the Greer Site.

45. Defendants knew that the Video A SEC Statement was false or recklessly disregarded the falsity of the statement, and published it with malice and with the intent to cause harm to Gaia.

46. The Video A SEC Statement is injurious and defamatory *per se*, in that it is specifically directed at Gaia and the defamatory meaning is apparent from the face of the statements without the aid of extrinsic proof. The Video A SEC Statement implies that Gaia has violated federal law, and it directly injures Gaia's business and professional reputation.

47. Video A contains numerous other defamatory false statements about Gaia, and upon information and belief, contains other fabricated information.

Video B – July 12, 2018

48. Upon information and belief, Greer is one of the speakers in a video titled "GAIA TV IMPLODING, What's Next? Part 2" ("Video B").

49. Upon information and belief, Video B was recorded on or about July 12, 2018.

50. Upon information and belief, Video B is a continuation of Video A.

51. Upon information and belief, Greer published Video B on the Greer Site on July 20, 2018, in a post titled "GAIA TV IMPLODING, What's Next? Part 2 with Sarah Westall, Laura Eisenhower, Patty Greer" ("Posting B"; a printout of the post is attached as Exhibit B).

Video B – Satanists, Luciferians, and Pedophilia Statements

52. At approximately 7:22-7:33 of Video B, Sarah Westall states about Gaia "[t]hat they started getting so bold at exposing their satanic nature. I mean, they just decided they're just gonna go just start doing it." ("Defamatory Statement B1").

53. At approximately 8:46-8:54 of Video B, Laura Eisenhower states that “[w]hen you use the name Gaia, and you have misogyny, you have patriarchal mindsets, you have Luciferianism, Satanism, that’s part of creating the dark reversals of the mother.” (“Defamatory Statement B2”).

54. At approximately 28:37-28:47 of Video B, Greer states about Gaia that “I don’t imagine that company has a chance in hell of surviving because nobody wants to work with that energy unless you’re also a pedophile Satanist monster.” (“Defamatory Statement B3”).

55. Defamatory Statement B1, Defamatory Statement B2, and Defamatory Statement B3 (collectively, the “Video B Satanist Statements”) are false statements of fact.

56. Defendants intentionally published the Video B Satanist Statements to the Greer Site.

57. Defendants knew that the Video B Satanist Statements were false or recklessly disregarded the falsity of the statements, and published them with malice and with the intent to cause harm to Gaia.

58. The Video B Satanist Statements are injurious and defamatory *per se*, in that they are specifically directed at Gaia and the defamatory meaning is apparent from the face of the statements without the aid of extrinsic proof. The Video B Satanist Statements accuse Gaia and its CEO of promoting Satanism and imply that Gaia employees are engaged in pedophilia, and they directly injure Gaia’s business and professional reputation.

Video B – Hacking Statements

59. At approximately 10:51-10:55 of Video B, Greer states about Gaia “perhaps that’s why they’ve spent so much time and money hacking me.” (“Defamatory Statement B4”).

60. At approximately 27:04-27:10 of Video B, Greer states about Gaia that **“they’re hacking everybody’s computers that work there, especially now that they’re scared of who doesn’t really like them.”** (“Defamatory Statement B5”).

61. Defamatory Statement B4 and Defamatory Statement B5 (collectively, the “Video B Hacking Statements”) are false statements of fact.

62. Defendants intentionally published the Video B Hacking Statements to the Greer Site.

63. Defendants knew that the Video B Hacking Statements were false or recklessly disregarded the falsity of the statements, and published them with malice and with the intent to cause harm to Gaia.

64. The Video B Hacking Statements are injurious and defamatory *per se*, in that they are specifically directed at Gaia and the defamatory meaning is apparent from the face of the statements without the aid of extrinsic proof. The Video B Hacking Statements accuse Gaia of illegally hacking people, and they directly injure Gaia’s business and professional reputation.

65. Video B contains numerous other defamatory and false statements about Gaia, and upon information and belief, contains other fabricated information.

Video C – July 20, 2018

66. Upon information and belief, Greer is one of the speakers in a video titled “Patty Greer-Laura Eisenhower: Gaia.com Pedocriminal-Satanist CEO. Whistleblowers David & Corey” (“Video C”).

67. Upon information and belief, Video C was recorded on or about July 20, 2018.

68. Upon information and belief, Greer published Video C on the Greer Site on July 20, 2018, in a post titled “Patty Greer, Laura Eisenhower, Alfred Lambremont Webre on #gaiatv, #GEM” (“Posting C”; a printout of the post is attached as Exhibit C).

Video C – Additional Satanists and Luciferians Statements

69. At approximately 2:43-2:58 of Video C, Alfred Lambremont Webre states **“we’re going to learn today an amazing program of how the employees at Gaia.com, a corporation headed up by now, by independent witness, a known Satanist.”** (“Defamatory Statement C1”).

70. At approximately 1:01:54-1:01:58 of Video C, Greer repeats an allegation from a letter or email written by a purportedly anonymous person in stating about Gaia that **“Denver Luciferian cover. Coven equals CIA front.”** (“Defamatory Statement C2”).

71. At approximately 1:10:16-1:10:20 of Video C, Alfred Lambremont Webre states about Gaia **“[y]ou can call the U.S. Attorney in, and you can have these Satanists arrested”** (“Defamatory Statement C3”).

72. At approximately 1:24:48-1:25:04 of Video C, Alfred Lambremont Webre states that Gaia is **“[a] 1988 Colorado corporation, 30% plus owned by . . . a, uh, Czechoslovakian operative brought here under CIA, communist, satanic connections.”** (“Defamatory Statement C4”).

73. Defamatory Statement C1, Defamatory Statement C2, Defamatory Statement C3, and Defamatory Statement C4 (collectively, the “Video C Satanist Statements”) are false statements of fact.

74. Defendants intentionally published the Video C Satanist Statements to the Greer Site.

75. Defendants knew that the Video C Satanist Statements were false or recklessly disregarded the falsity of the statements, and published them with malice and with the intent to cause harm to Gaia.

76. The Video C Satanist Statements are injurious and defamatory *per se*, in that they are specifically directed at Gaia and the defamatory meaning is apparent from the face of the statements without the aid of extrinsic proof. The Video C Satanist Statements accuse Gaia and its CEO of promoting Satanism, and they directly injure Gaia's business and professional reputation.

Video C – Energy Weapon Attacks Statements

77. At approximately 2:04-2:22 of Video C, Alfred Lambremont Webre states about Gaia **“its sponsored conferences, which resulted in deaths, disabilities, and severe injuries to person from military-grade directed energy weapons.”** (“Defamatory Statement C5”).

78. At approximately 42:15-42:33 of Video C, Greer states about Gaia that **“it happened in those buildings a number of times, I think, perhaps, are dealing with some of the directed energy weapons right there at home because that's where they're coming from, I think, and the machine that's in their back room is, um, perhaps not a friend of ours.”** (“Defamatory Statement C6”).

79. Defamatory Statement C5 and Defamatory Statement C6 (collectively, the “Video C Energy Weapon Attack Statements”) are false statements of fact.

80. Defendants intentionally published the Video C Energy Weapon Attack Statements to the Greer Site.

81. Defendants knew that the Video C Energy Weapon Attack Statements were false or recklessly disregarded the falsity of the statements, and published them with malice and with the intent to cause harm to Gaia.

82. The Video C Energy Weapon Attack Statements are injurious and defamatory *per se*, in that they are specifically directed at Gaia and the defamatory meaning is apparent from the face of the statements without the aid of extrinsic proof. The Video C Energy Weapon Attack Statements accuse Gaia of having illegal technology and using that technology to harm people, and they directly injure Gaia's business and professional reputation.

Video C – Additional Hacking Statements

83. At approximately 31:25-31:27 of Video C, Greer states about Gaia **“this is the company hacking my work all these years.”** (“Defamatory Statement C7”).

84. At approximately 32:42-32:45 of Video C, Greer repeats an allegation from a letter or email written by a purportedly anonymous person in stating about Gaia that **“CEO has non-Gaia spooks hack.”** (“Defamatory Statement C8”).

85. At approximately 1:22:48-1:22:50 of Video C, Greer states about Gaia **“[i]f you wanna know why they’re hacking me”** (“Defamatory Statement C9”).

86. Defamatory Statement C7, Defamatory Statement C8, and Defamatory Statement C9 (collectively, the “Video C Hacking Statements”) are false statements of fact.

87. Defendants intentionally published the Video C Hacking Statements to the Greer Site.

88. Defendants knew that the Video C Hacking Statements were false or recklessly disregarded the falsity of the statements, and published them with malice and with the intent to cause harm to Gaia.

89. The Video C Hacking Statements are injurious and defamatory *per se*, in that they are specifically directed at Gaia and the defamatory meaning is apparent from the face of the statements without the aid of extrinsic proof. The Video C Hacking Statements accuse Gaia of illegally hacking people, and they directly injure Gaia's business and professional reputation.

90. Video C contains numerous other defamatory and false statements about Gaia.

Video D – July 6, 2018

91. The video titled “#GEM: D_vid W_lcock Resigns, G___ TV Abuses Confirmed #LUCIFER” (“Video D”) features an unknown speaker who purports to be affiliated with “You Are Free TV”.

92. The vast majority of Video D is the unknown speaker purportedly reading a letter written by David Wilcock, an independent contractor who has worked with Gaia.

93. Upon information and belief, Video D was recorded on or about July 6, 2018.

94. Upon information and belief, Greer published Video D on the Greer Site on July 20, 2018, in a post titled “#GEM: D_vid W_lcock Resigns, G___ TV Abuses Confirmed #LUCIFER” (“Posting D”; a printout of the post is attached as Exhibit D).

Video D – Further Rants about Luciferians

95. At approximately 8:39-8:50 of Video D, the unknown speaker purportedly quotes from the Wilcock letter in stating about Gaia that “[t]his show is literally saying that **God is evil and Lucifer is God, who . . . also happens to be a reptilian alien.**” (“Defamatory Statement D1”).

96. At approximately 11:05-11:20 of Video D, the unknown speaker purportedly quotes from the Wilcock letter in stating about Gaia that “**the Ancient Civilizations program was**

promoting Lucifer . . . the marketing and the production of this Lucifer propaganda has continued unabated.” (“Defamatory Statement D2”).

97. At approximately 12:29-12:36 of Video D, the unknown speaker purportedly quotes from the Wilcock letter in stating about Gaia that **“none of this Lucifer propaganda has ever been as direct as the religious perspective that was articulated in *Ancient Civilizations*.”** (“Defamatory Statement D3”).

98. At approximately 13:26-13:35 of Video D, the unknown speaker purportedly quotes from the Wilcock letter in stating about Gaia that **“[f]urthermore, I have witnessed multiple cases in which a commercial for Lucifer, I mean *Ancient Civilizations*, is burned into the end of my show *Cosmic Disclosure*.”** (“Defamatory Statement D4”).

99. Defamatory Statement D1, Defamatory Statement D2, Defamatory Statement D3, and Defamatory Statement D4 (collectively, the “Video D Luciferian Statements”) are false statements of fact.

100. Defendants intentionally published the Video D Luciferian Statements to the Greer Site.

101. Defendants knew that the Video D Luciferian Statements were false or recklessly disregarded the falsity of the statements, and published them with malice and with the intent to cause harm to Gaia.

102. The Video D Luciferian Statements are injurious and defamatory *per se*, in that they are specifically directed at Gaia and the defamatory meaning is apparent from the face of the statements without the aid of extrinsic proof. The Video D Luciferian Statements accuse Gaia and its CEO of promoting Lucifer and Luciferianism, and they directly injure Gaia’s business and professional reputation.

103. Video D contains numerous other defamatory and false statements about Gaia.

104. Upon information and belief, Greer authored each of Posting A, Posting B, Posting C, and Posting D (collectively, the "Postings") and caused them to be published on the Greer Site.

105. Upon information and belief, Greer published to the Greer Site each of Video A, Video B, Video C, and Video D (collectively, the "Videos").

Additional Defamatory Statements

106. In addition to the Videos and the Defamatory Statements contained therein, Greer has continued to publish additional Defamatory Statements about Gaia and its employees. Greer has continued to do so despite requests from Gaia to take down her defamatory statements and cease and desist making any further defamatory statements.

107. Defendants knew the additional Defamatory Statements were false or recklessly disregarded the falsity of the statements, and published them with malice and with the intent to cause harm to Gaia.

108. The Videos, in their entirety, including the various Defamatory Statements contained therein, and the additional Defamatory Statements, have been republished or linked to on numerous websites, including YouTube (www.youtube.com), Vimeo (vimeo.com), Twitter (twitter.com) and LinkedIn (www.linkedin.com), and have thus been widely disseminated to the public.

109. Upon information and belief, in addition to publishing the Defamatory Statements on the Greer Site, Greer linked to the Videos and/or the Postings through her social media pages on Twitter (@Ritelight), Facebook (patty.greer.14), and LinkedIn (pagreer) and other sites in order to further disseminate the statements therein across the internet.

110. The entirety of each of the Defamatory Statements and the full audio in the Videos gives a false and defamatory impression of Gaia's business.

Damage to Gaia

111. Gaia has been damaged by the Defamatory Statements in the operation of its business.

112. Gaia has also been forced to take extra security measures due to the numerous threats that Gaia has received, including threats targeting specific individual employees.

113. Gaia has been further damaged in an amount yet to be determined, including without limitation due to the loss of potential new customers and business partners who have been exposed to each of the Defamatory Statements.

CAUSE OF ACTION FOR DEFAMATION

114. Plaintiff hereby realleges and incorporates by reference paragraphs 1 through 113 of the Complaint as if fully set forth herein.

115. Greer made or published each of the Defamatory Statements regarding Gaia, which are false statements of fact.

116. Defendants intentionally published each of the Defamatory Statements to an unknown number of third parties and the public generally by posting them on the Greer Site, and linked to the Postings using other public third-party websites such as YouTube and Vimeo.

117. Defendants knew that each of the Defamatory Statements were false or recklessly disregarded the falsity of these statements, and published them with malice and with the intent to cause harm to Gaia.

118. Each of the Defamatory Statements are injurious and defamatory *per se*, in that they are specifically directed at Gaia and the defamatory meaning is apparent from the face of the

publication without the aid of extrinsic proof. In particular, each of the Defamatory Statements impute to Gaia the commission of one or more crimes or other improprieties, and directly injure Gaia's business and professional reputation.

119. Further, Gaia has suffered injury as set forth above as a result of each of the Defamatory Statements.

120. As a result of publishing each of the Defamatory Statements with reckless disregard for their truth, Defendants are liable to Gaia for presumed and actual damages in an amount to be determined at trial, but not less than \$1,000,000.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order in favor of Plaintiff Gaia, Inc. and against Defendants Patty Greer Roche and Greer Films LLC, as follows:

A. Requiring Greer to remove the Postings and Videos, in their entirety, from <https://cropcirclefilms.com> and any other sites to which Greer has posted the Postings, the Videos, or a link to the Postings or the Videos, including but not limited to twitter.com, facebook.com, youtube.com, and vimeo.com; to withdraw any submissions of the Postings, the Videos, or related information made to other websites and/or applications;

B. Requiring Greer to issue a public apology for defaming Gaia and to issue a retraction in full and to publish such apology and retraction on <https://cropcirclefilms.com> and to all other websites to which the Postings or the Videos were published;

C. Enjoining Greer and Greer Films from publishing any further defamatory statements regarding Plaintiff Gaia, Gaia's employees, and any other related entities;

D. Awarding a judgment against Greer and Greer Films, jointly and severally, in an amount to be determined at trial, but not less than \$1,000,000;

E. Awarding pre-judgment interest and costs and disbursements of this action; and

F. Providing for such other and further relief as this Court deems to be just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands trial by jury on all claims and issues so triable.

Dated: December 27, 2018.

Respectfully submitted,

/s/ Lester C. Houtz
Lester C. Houtz (Atty. Reg. No. 20165)

Attorneys for Plaintiff Gaia, Inc.