

# HUESTON HENNIGAN LLP

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October 3, 2017

## **VIA E-MAIL**

Keith Harmon Snow  
keith.harmon.snow@gmail.com

Re: Defamatory Statements Regarding Dr. Guy McPherson

Dear Keith Harmon Snow:

We represent Dr. Guy McPherson in connection with the false and misleading statements contained in your blog post entitled "Climate Chaos, Abuse of Authority and Trust, & Our Deeply Entrenched Rape Culture" published on "Conscious Being Alliance" on September 28, 2017. The malicious, distorted, and sensationalized descriptions of Dr. McPherson in that posting are defamatory and must immediately cease.

**Through this letter we hereby demand that by October 5, 2017** you: (1) remove the offending post; (2) issue a clearly-posted and labeled retraction and apology, as described below, visible on the front page of your site, Conscious Being Alliance; (3) remove any comments or posts under your control (e.g., on the "Comments" section of the site or Facebook) that repeat or embellish the false accusations; and (4) cease and desist repeating and perpetuating these false and misleading statements. **If you fail to comply with this demand**, Dr. McPherson intends to pursue all legal options, including filing a lawsuit seeking, among other things, monetary damages and injunctive relief from a court of law to remove the offending statements.

## **False Statements and Defamatory Innuendo**

Your post falsely accuses Dr. McPherson and implies that he has engaged in abusive and non-consensual sexual misconduct. Based on information and allegations you claim to have personally corroborated, your post claims that among other things:

- "Dr. McPherson did indeed engage in the alleged unethical behavior and that this has involved many women, some of whom have been/are/were very vulnerable."
- Dr. McPherson "fraudulent[ly] use[d] . . . donations received through the Nature Bats Last web site" in order "to lure women to his personal reserve."
- That the women who allegedly interacted with Dr. McPherson are "survivors of sexual assault and/or sexual predation," and that Dr. McPherson has engaged in a "cycle of abuse."
- "Dr. McPherson has further exploited his position and power by engaging in 'healing work' . . . which simultaneous to the relationships alleged to have occurred is unethical and

actually causing harm to women (if not others) allegedly using grooming techniques and other predatory behaviors, many of which perpetuate the (our) western rape culture.”

- Dr. McPherson’s partner, Pauline Schneider “wished lethal harm” on one woman and has otherwise taken actions “in a clear effort to excuse and dismiss Dr. McPherson’s behavior(s).”

Your post also repeatedly incorporates the allegations contained in the “Statement,” posted on the “Wrong Kind of Green” on August 26, 2017. That post claimed, among other things, that Dr. McPherson has a “repeated and lengthy record of attempting and succeeding in taking advantage of women in a vulnerable position emotionally” and “has engaged in fantasies of rape of sexual enslavement.” Moreover, your post substantially develops and enhances those allegations by purporting to independently verify them. For example, you claim that “[a]fter asking many questions, and personally looking into things, [you] have corroborated some of the claims about Dr. McPherson,” and that you “have confirmed that another woman (whom [you] know personally) was the victim of Dr. Guy McPherson’s faux promises and seductive deceptions.”

Your post acknowledges the gravity of your allegations, stating that “this is far more serious than a question of someone’s ‘personal life’ or dirty laundry.” You then state that you “consider it your responsibility to join those who have already spoken out.” You compare Dr. McPherson’s behavior to instances of serious sexual abuse and assault, writing that your post is “in the same spirit of solidarity and truth and support that informed your decision . . . to publicly post about the sexual predation of Colin Garland.” Colin Garland, as you are well aware, stands accused of rape. You also claim that your allegations against Dr. McPherson “remind[]” you of the “extreme sexual abuse and unconsciousness of other gurus, such as Bikram Choudhury.” Bikram Choudhury, who you describe as a “proven sexual predator,” has been accused by multiple women of forcible rape.

This innuendo leaves a clear impression on the reader that Dr. McPherson is guilty of sexual conduct that is non-consensual, violent, and abusive, as well as physically, emotionally, and mentally controlling.

These sweeping false statements and defamatory innuendo are apparently based on nothing more than the following: Dr. McPherson had a nearly year-long online relationship with Serena Marie Raphael McPherson. They never met in person. Dr. McPherson’s partner, Pauline Schneider, was at all times aware and supportive of his relationship with Serena. Serena regularly professed her love for Dr. McPherson, and he expressed the same towards her. The relationship was founded on this emotional connection, and both Serena and Dr. McPherson sent messages of a sexual nature to one other. At no point did Serena express any discomfort regarding the sexual nature of the conversations. Indeed, she sometimes initiated them. After nearly a year of these consensual communications, Serena abruptly told Dr. McPherson she was engaged to another man. She then released via Facebook a limited screenshot of one consensual conversation, strategically selected and cropped to focus on a single message with no context. The full context shows that immediately after the screenshot portion, Dr. McPherson’s tells Serena: “I was kidding, as usual,” and Serena responds by telling Dr. McPherson that she loves him. She then asks if she could join his upcoming tour.

This is apparently not the first time this has happened. Indeed, Dr. McPherson later learned that Serena has previously shared in a misleading way the contents of sexual conversations with other partners.

**Demand**

Once again, by **October 5, 2017**, we demand that you take the following steps:

- Remove the post entitled “Climate Chaos, Abuse of Authority and Trust, & Our Deeply Entrenched Rape Culture” published on “Conscious Being Alliance” on September 28, 2017.
- Issue a retraction of your post. The retraction must contain an apology for the false statements and innuendo created, and must be prominently and conspicuously displayed on the Conscious Being Alliance website (*i.e.*, at or near the top of the web-page) and remain posted for at least 30 days. The apology itself must be phrased in good faith and subject to our review and approval.
- Remove any comments or posts under your control that repeat or embellish the false accusations.
- Cease and desist from further false and misleading statements about Dr. McPherson.

Please let us know immediately if you do not intend to cooperate. While we will not unnecessarily initiate litigation in this matter, Dr. McPherson will not hesitate to pursue his legal rights if you continue your defamatory actions. All rights are reserved.

Regards,



Steven N. Feldman

SF:mt

cc: Eric Hayden, Esq.  
Michael Todisco, Esq.