# UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

DONALD L. HILTON JR	§	
VS.	§	NO: SA: 19-CV-00755-OLG
NICOLE PRAUSE and LIBEROS LLC	§	

#### **AFFIDAVIT OF STACI SPROUT**

My name is Staci Sprout. I am older than 18 years of age, I am of sound mind, I have never been convicted of a felony, I am personally familiar with the facts stated herein, and I am fully capable of making this affidavit. I swear under penalty of perjury that the statements contained herein are based on my personal knowledge and are true and accurate.

I am a licensed psychotherapist, a certified sex addiction therapist, and am the author of the book, *Naked in Public: A Memoir of Recovery From Sex Addiction and Other Temporary Insanities.* My book and much of my work is intended to provide hope and help to people who suffer from sexual addiction. As detailed more fully below, I have been attacked online and have been falsely accused by Nicole Prause because I disagree with her on the issue of whether pornography is addictive.

### I. <u>Harassing Complaints to Regulatory Bodies</u>

Dr. Prause made three formal complaints against me to regulatory bodies: two to the Washington State Department of Health, and one to the National Association of Social Workers. In each case, the complaints contained false accusations against me.

# A. Complaints by Dr. Prause against me to the Washington State Department of Health

Dr. Prause made an unfounded complaint to the Washington State Department of Health on January 24, 2018, which was dismissed without investigation. Among other things, she falsely claimed that I engaged in "false advertising to patients" "intentional misinformation" and that I violated "numerous standards of care". From the terms of her communication to the Department of Health, her real concern was that I teach people that sex addiction is a genuine problem that can be overcome with proper therapy and help. Dr. Prause disagrees and made false complaints to the Washington State Department of Health because of such disagreement. A true and accurate copy of the complaint is attached and incorporated herein as Exhibit "A".

Dr. Prause made a second unfounded complaint to the Washington State Department of Health on June 13, 2018. Again, her complaint was closed without investigation. I have never before or since been accused of wrongdoing or ethical misconduct since I began my professional social work career in 1994.



#### **B.** Complaint to the National Association of Social Workers

In the summer of 2018, Dr. Prause filed a formal complaint to the National Association of Social Workers about me for ethical violations. Again, the gist of the complaint was that I was spreading false information and taking advantage of my clients because my therapy practice is dedicated to helping adults heal from sex/relationship addiction, intimacy avoidance, and betrayal trauma. This complaint was also dismissed because it lacked merit. I note that Dr. Prause included a wide volume of screen shots in her complaint, which indicated to me that she was cyberstalking my work with malicious intent.

#### II. Public Bullying, Harassment, and Libel

I have had several uncomfortable exchanges with Nicole Prause online. For example, my second contact with her was discovering a comment on a post (about the International Classification of Diseases-11 consideration of the Compulsive Sexual Behavior Disorder diagnosis) that Dr. Prause had made on my Facebook author page, defaming me by accusing me of lying, fraud, other unethical behavior, and practicing without a license. I am not "friends" with her on Facebook; it is a public page, and she sought me out to comment there. A true and accurate copy of a screen shot of her comments is attached and incorporated herein as Exhibit "B" to this declaration.

Further Affiant sayeth not.

#### VERIFICATION

COUNTY OF King

Before me, the undersigned authority, on this day personally appeared Staci Sprout the affiant, whose identity is known to me. After I administered an oath, affiant testified as follows:

"My name is Staci Sprout. I am capable of making this verification. I have read the affidavit, and the facts stated in it are within my personal knowledge and are true and correct."

Sworn to and subscribed before me on this the 18th day of John My commission expires:

Notary Public in and for the State of washington

### **Assessment Worksheet**

Respondent: ate: 2/1/2018	Case Num Board/Commission	ber: 2018-144 /Profession:		
resented by:			Staff present:	
taff/Panel present:			•	on/CMT meeting
] Brown				
Kellington				
Slater				
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■ BT- No Jurisdiction	☐ BT- No viola		■ BT- Communication and	☐ BT- Risk minimal, not
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BT- Billing and fee disputes except as	■ BT- Time pra expired credentia		□ BT- Incident reported by facility	true, no violation of law
designated by disciplining	disciplining author		raciity	occurred
authority	discipining addition	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		Jocomed
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<ul><li>d) Isolated incidents</li><li>e) Advertising that is a</li></ul>	practitioner is alre			1
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C. <u>SEXUAL MIS</u>	CONDUCT CAS	<u>ES</u>		
not involve clinic	cal expertise or stand	dard of care iss		o the Secretary when the case de ation referral should still includ
	on for investigation.) Panel finds there are		EXHIBIT	

A

AGE 1

No clinical issues, refer case to 5

SPROUT, STAC.

#### COMPLAINT INTAKE SUMMARY WORKSHEET

### RESPONDENT INFORMATION

Name &				STACI LEANNE SPROUT		E SPROUT			2018-1442	! LW
Address				1818 WESTLAKE AVE N STE 118 Allegation					Allegation	Pending
	SEATT	LE, WA	98109-2707			License #	SWI.LW.0	0006544		
					Issued	7/22/01				
						Expires	4/21/18			
Phone #						Status	Active in R	enewal		
Legal Action	Yes	No	Compliance	Yes	No	Cases	Open:	Closed:		
							0	0		

### COMPLAINANT INFORMATION

Name & Address	NICOLE PRAUSE WA	,	
Phone #	1 - DOH Licensee Health P	E-Mail	nicole.prause@gmail.com

#### SUMMARY OF COMPLAINT

Respondent is alleged to have stated that the counseling colleagues have "lobbyists" and that "pornography sites who are paid for advertising, and drug manufacturers of ED drugs". Complainant states that neither she or her colleagues who publish peer-reviewed science have any "lobbyist" efforts. These are conspiracy theories appear promoted to support her own books and profit her therapy services.

### Case 5:19-cv-00755-OLG Document 5-14 Filed 07/24/19 Page 6 of 21

#### Palmateer, Kyle M (DOH)

From: Nicole Prause <nicole.prause@gmail.com>

Sent: Wednesday, January 24, 2018 3:06 PM

To: DOH HSQA Complaint Intake
Subject: Complaint against Staci Sprout

Attachments: Sprout\_LCSW\_ComplaintToWashingtonBoard.pdf

Dear Washington State Department of Health,

Please find my complaint against Staci Sprout (LW00006544) attached. I can be reached with any questions using this email or the phone below.

While Ms. Sprout may be able to identify me from the content of the complaint alone, I would prefer not to be named to her, if possible.

Nicole Prause, Ph.D.

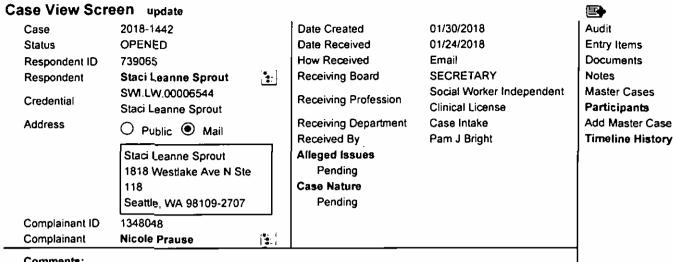
Liberos LLC: www.liberoscenter.com

1 - DOH Licensee Healt...

RECEIVED

JAN 24 2018

DOH/HSQA/OCS COMPLAINT INTAKE UNIT

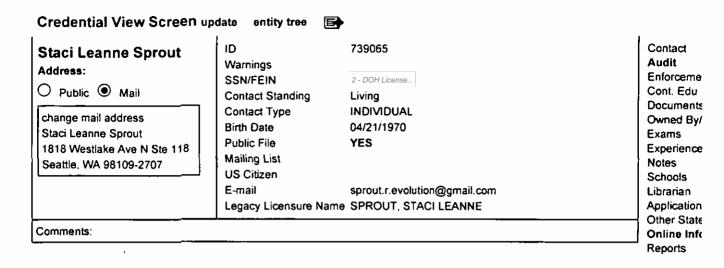


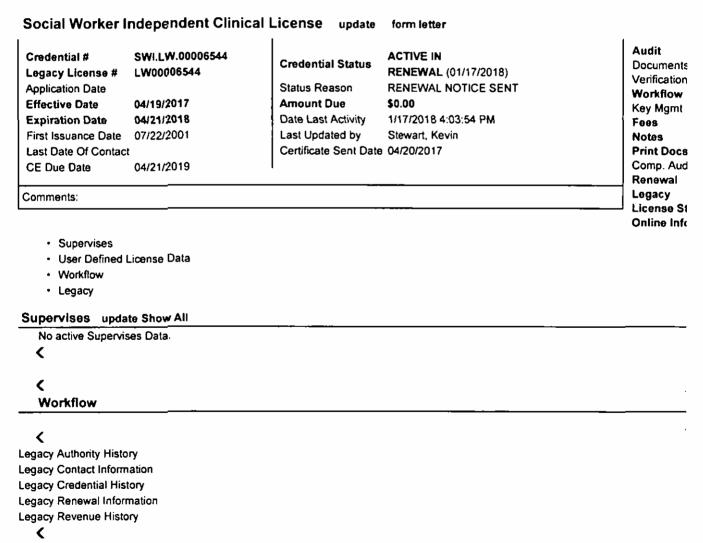
#### Comments:

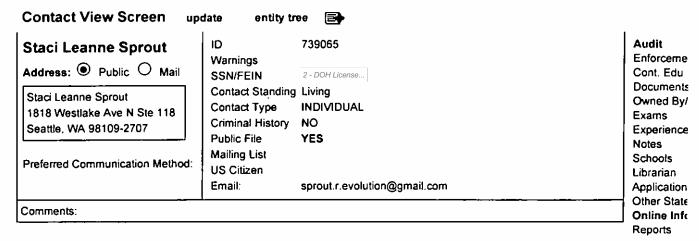
- Action Items
- Resolution
- Participants
- Priority History
- HIPDB Reports

Action Items add add group

**Order Signed** Type Assigned To Activity **Track Time** Due Effective Completed Created ▼ No action items found







- Addresses
- · Individual Information
- · Credential List
- Legacy

**Contact Addresses** add

Address Information	Contact	Information	Update Addresses
Staci Leanne Sprout	Phone	(206) 949-6150	update
1818 Westlake Ave N Ste 118	Fax		MAIN ADDRESS
Seattle, WA 98109-2707	Cell	(206) 949-6150	Contact Public Address
County: King	Email	sprout.r.evolution@gmail.com	Contact Mail Address
Country: United States	Į.		Form Letter
Joined on: 08/30/2017			Public Address for: - SWILW.00006544
Last updated by Diane Dysle (DOH)			Mail Address for: - SWI.LW.00006544
	ı		- 3441.1.44.00000344



Individual Information update

Field	Value	Field	Value
Birth Place		Gender	F
Birth Date	04/21/1970	Online User ID	SPRO739065
Drivers License State	WA		



Credentials add

		Effective	Expiration		
Credential	License Type	Date	Date	Status	Reas
SWI.LW.00006544	Social Worker Independent	04/19/2017	04/21/2018	ACTIVE IN RENEWAL	RENEWA
Staci Leanne Sprout	Clinical License		1		NOTICE 5
1818 Westlake Ave N Ste 118			ļ		
Seattle, WA 98109-2707			1		
SW.SW.40002790	Social Worker Certificate		07/19/2001	EXPIRED	PROFESS
Staci Leanne Sprout					DISCONT
1818 Westlake Ave N Ste 118					
Seattle, WA 98109-2707					
<b>&lt;</b>	·				•



Legacy Contact Information Legacy Credential History



# STATE OF WASHINGTON DEPARTMENT OF HEALTH

February 22, 2018

Nicole Prause nicole.prause@gmail.com

Subject: Report No: 2018-1442 Social Worker Independent Clinical License

Dear Nicole Prause:

The department carefully reviewed your report about Staci Sprout in accordance with the disciplinary process under Washington's Uniform Disciplinary Act (chapter 18.130 RCW). We closed this report without an investigation or disciplinary action. If the allegations are true, no violation of the law occurred.

The law allows you one opportunity to ask that we reconsider our decision. To do so, you must provide new information about your original report within 30 days of receiving this letter. After 30 days, we will treat any new information as a new report. Please send any new information to the Department of Health, Office of Investigation and Inspection, Case Management, P.O. Box 47874, Olympia, WA 98504-7874.

You have the right to request any publicly disclosable information contained in the file. To do so, submit a written request to the Department of Health, Public Disclosure and Records Center, P.O. Box 47865, Olympia, WA 98504-7865; fax 360-586-2171; email pdrc@doh.wa.gov.

If you have questions, please contact Kitty Slater-Einert at (360) 236-4730 or email kitty.slater@doh.wa.gov.

Sincerely,

Health Systems Quality Assurance Complaint Intake Unit

# STATE OF WASHINGTON DEPARTMENT OF HEALTH

February 22, 2018

Staci Leanne Sprout 1818 Westlake Ave N Ste 118 Seattle, WA 98109-2707

Subject: Report No: 2018-1442 Social Worker Independent Clinical License

Dear Staci Sprout:

The department received and reviewed a report alleging you committed unprofessional conduct. We closed this report without an investigation or disciplinary action. If the allegations are true, no violation of the law occurred. This report will not appear on our provider credential search webpage because we took no action against your credential.

We carefully reviewed the report in accordance with the disciplinary process under Washington's Uniform Disciplinary Act (chapter 18.130 RCW). We may reconsider this decision if we receive new information or identify a pattern of similar concerns.

We have notified the person who filed the report of this decision. Because of state law RCW 43.70.075, we may not be able to release information about the person who filed the report. We cannot release details of the report via telephone or email.

You have the right to request any publicly disclosable information contained in the file. To do so, submit a written request to the Department of Health, Public Disclosure and Records Center, P.O. Box 47865, Olympia, WA 98504-7865; fax to 360-586-2171; email pdrc@doh.wa.gov.

You may submit a written statement to include in the file. Your statement may be subject to public disclosure.

If you have questions, please contact Kitty Slater-Einert at (360) 236-4730 or email kitty.slater@doh.wa.gov.

Sincerely,

Health Systems Quality Assurance Complaint Intake Unit

## Department of Health staff need to:

- Place this notice in the case file.
- Keep this notice in the case file when the case is closed.

# **Notice**

A whistleblower is "a consumer, employee, or health care professional who reports quality of care concerns to the department of health." WAC 246-15-010(9). An individual's identity as a complainant is kept confidential except for release "to appropriate department staff or disciplining authority members, in response to a court order, or if the complaint is not made in good faith." WAC 246-15-020 and 246-15-030. However, if a whistleblower plays some other role in the complaint---as a witness for example---his or her identity may be disclosed. A notice that the complaint was made by a whistleblower will be placed and remain in the department's complaint file.

RCW 43.701.075; WAC 246-15-010; WAC 246-15-020(2); and WAC 246-15-030.

# DO NOT REMOVE FROM FILE

#### Complaint against Staci Sprout (LW00006544)

The full name and address of the person you are filing a complaint against LCSW license LW00006544

Staci Sprout c/o Recontext Media 1818 Westlake Avenue North, Suite 118 Seattle, WA 98109

http://www.stacisprout.com/ https://twitter.com/Stacisprout

https://www.facebook.com/staci.sprout

https://stacisprout.tumblr.com/

http://www.huffingtonpost.com/author/stacisprout-371

https://vimeo.com/user47028359

https://www.youtube.com/channel/UC-UnLG5N7R9LWKV8DB1eNLA

https://www.linkedin.com/in/staci-sprout-licsw-csat-4b552b8/

https://plus.google.com/+StaciSprout

• Dates of client-patient relationship: List the date the client-patient relationship began and the date that it ended.

Not a patient, but a licensed psychologist colleague January 1, 2018-present

• Dates of incidents: List each date on which the incident occurred.

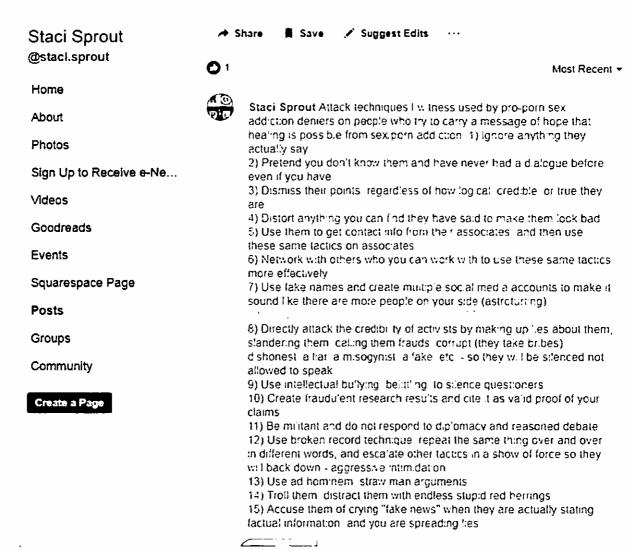
**Date:** January 18, 2018

Place: ICD-11 forum comments

| Id lies 15 | The Control of the co

Violation: Stated that we had "lobbyists" and that "pornography sites who are paid for advertising, and drug manufactures of ED drugs". None of this is true. Neither I nor any of my colleagues who publish peer-reviewed science have any "lobbyist" efforts. These conspiracy theories appear promoted to support her own books and profit her therapy practice.

Date: January 24, 2018
Place: Sprout Facebook page



#### Violation:

Falsely claimed that I faked my research in my publications. Falsely claimed that I create fake online names or accounts to stalk those I disagree with. Falsely claimed that I use "aggressive intimidation" by citing research. Falsely claimed that I "spread lies".

Date: January 18, 2018
Place: Sprout Twitter page



Staci Sprout @Stacisprout · Jan 18

Fantastic news: Sex Addiction-related diagnosis will be included in the newest version of the International... fb.me/9lHyQAIIg

Q tì 0 1

Violation: Stated that "sex addiction-related diagnosis will be included" in the ICD-11. "Sex addiction" was specifically removed from the ICD draft back in 2016, and "porn addiction" was never in it.

Date: January 6, 2018
Place: Sprout Twitter page



Staci Sprout @Stacisprout - Jan 6

Sex addiction gets a medical diagnosis with international authority, the **ICD-11** Beta-Draft:

6D32 Compulsive... fb.me/5XhdvlYiP

Q 172 04

Violation: Stated that "sex addiction gets a medical diagnosis" in the ICD-11. "Sex addiction" was specifically removed from the ICD draft back in 2016, and "porn addiction" was never in it.

#### **Details of complaint:**

Ms. Sprout has engaged in systematic false advertising to patients, intentional misinformation, and libel against licensed psychologist (myself). Making false statements to patients and making false statements about another provider engaged in criminal activity appear to violate numerous standards of care, including false representations in advertisements. The papers that describe the removal of "porn addiction" and "sex addiction" from ICD-11 are provided below. I will provide any of the documents on request, although the relevant sections are pasted below. In addiction, I paste below the removal of the "Sex addiction" term from ICD-11 back in June 2017 by the World Health Organization.

Advanced Search ]	Browse	Proposa	ls Pro	oposal List	Inf	ю 				<del></del>
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Exclusion						•				<u> </u>
Paraphili	c disorders									
Body System										

Kraus, S. W., Krueger, R. B., Briken, P., First, M. B., Stein, D. J., Kaplan, M. S., . . . Reed, G. M. (2018). Compulsive sexual behaviour disorder in the icd-11. *World Psychiatry*, 17, 108-109. doi:10.1002/wps.20464

Currently, there is an active scientific discussion about whether compulsive sexual behaviour disorder can constitute the manifestation of a behavioural addiction<sup>5</sup>. For ICD-11, a relatively conservative position has been recommended, recognizing that we do not yet have definitive information on whether the processes involved in the development and maintenance of the disorder are equivalent to those observed in substance use disorders, gambling and gaming<sup>8</sup>. For this reason, compulsive sexual behaviour disorder is not included in the ICD-11 grouping of disorders due to substance use and addictive behaviours, but rather in that of impulse control disorders. The understanding of compulsive sexual behaviour disorder will evolve as research elucidates the phenomenology and neurobiological underpinnings of the condition<sup>7</sup>.

Grant, J. E., Atmaca, M., Fineberg, N. A., Fontenelle, L. F., Matsunaga, H., Janardhan Reddy, Y., . . . Veale, D. (2014). Impulse control disorders and "behavioural addictions" in the icd-11. World Psychiatry, 13, 125-127.

A third key controversy in the field is whether problematic Internet use is an independent disorder. The Working Group iGrant et al (2014) teneous condition, and that use of the Internet may in fact constitute a delivery system for various forms of impulse control dysfunction (e.g., pathological game playing or pornography viewing) Importantly, the descriptions of pathological gambling and of compulsive sexual behaviour disorder should note that such behaviours are increasingly seen using Internet forums, either in addition to more traditional settings, or exclusively (22,23). The DSM-5 has included Internet gaming disorder in the section "Conditions for further study". Although potentially an important behaviour to understand, and one certainly with a high profile in some countries (12), it is questionable whether there is enough scientific evidence at

questionable whether there is enough scientific evidence at this time to justify its inclusion as a disorder. Based on the limited current data, it would therefore seem premature to include it in the ICD-11.

Licensed witnesses who can verify that the information she is providing to patients and about myself is false

Roger Libby
David Ley
Jay Blevins
Other and contact information available on request.

#### Your contact information

Nicole Prause, PhD Nicole.prause@gmail.com

#### Palmateer, Kyle M (DOH)

From:

Nicole Prause <nicole.prause@gmail.com>

Sent:

Wednesday, January 24, 2018 4:38 PM

To:

DOH HSQA Complaint Intake

Subject:

Re: Complaint against Staci Sprout

Hi,

Thank you for the acknowledgement. It sounds like I may qualify for whistleblower protections under "another license holder (WAC 246-15-010)." I am a licensed psychologist (#27778) reporting a colleague.

NP

Nicole Prause, Ph.D.

Liberos LLC: www.liberoscenter.com

1 - DOH Licensee Healt...

On Wed, Jan 24, 2018 at 4:35 PM, DOH HSQA Complaint Intake < < HSQAComplaintIntake@doh.wa.gov > wrote:

Thank you for contacting the Washington State Department of Health Complaint Intake Unit. We have received your email. The information you sent will be provided to the appropriate disciplining authority for review.

If you filed this complaint anonymously, you will not receive any further response from the department. Complaints submitted by email, where the complainant only provides their name in the email address line may be treated as an unknown complainant. Anonymous and unknown complainants may not receive follow up from the department. If you provided your full name, in the body of the email or on the complaint form, and your mailing address, you will be notified in writing whether the disciplinary authority authorized an investigation or not.

Complaints that don't include the names of the people involved are difficult to investigate and may limit us from moving forward. People who provide their name or contact information in complaints aren't considered anonymous. Under public records laws, we can't withhold the names of people who complain unless they qualify as "whistleblowers." The identity of a whistleblower who complains, in good faith, about the improper quality of care by a health care provider, or in a health care facility, remains confidential (RCW 43.70.075). Not everyone who files a complaint qualifies as a whistleblower. In order to enjoy whistleblower protection, the person filing the complaint must be a consumer of health care, an employee of the provider, or another license holder (WAC 246-15-010).

Complaints on hotels, motels, temporary worker housing and migrant farmworker housing most likely will not enjoy whistleblower protection. Complaints on these facilities usually do not meet the standard that a complaint be about "improper quality of care" in order to receive whistleblower protection.

You can verify whether a health care provider has any open or closed complaints through the Customer Service Call Center at 360-236-4700 or <a href="https://hsqa.csc@doh.wa.gov">hsqa.csc@doh.wa.gov</a>. You can also submit a request for any available records, pursuant to the Public Disclosure Act RCW 42.56 and the Uniform Disciplinary Act RCW 18.130, through our Public Disclosure Unit at <a href="mailto:pdrc@doh.wa.gov">pdrc@doh.wa.gov</a>.

For more details regarding the complaint process please visit our website

**Kyle Palmateer** 

Complaint Intake Unit

Washington State Department of Health

360-236-2620 Complaint Intake Main Line

360-236-2626 Fax

www.doh.wa.gov/hsqa

Public Health ~ Always working for a Safer and Healthier Washington

From: Nicole Prause [mailto:nicole.prause@gmail.com]

Sent: Wednesday, January 24, 2018 3:06 PM

To: DOH HSQA Complaint Intake < HSQAComplaintIntake@DOH.WA.GOV >

Subject: Complaint against Staci Sprout

Dear Washington State Department of Health,

Please find my complaint against Staci Sprout (LW00006544) attached. I can be reached with any questions using this email or the phone below.

While Ms. Sprout may be able to identify me from the content of the complaint alone, I would prefer not to be named to her, if possible.

Nicole Prause, Ph.D.

Liberos LLC: www.liberoscenter.com

1 - DOH Licensee Healt...

Case File\_1018145\_pdf-r-pdf-redacted on:3/28/2018 14:19 Document 5-14 Filed 07/24/19 Page 20 of 21

Redaction Summary (6 redactions)

#### 2 Privilege / Exemption reasons used:

- 1 -- "DOH Licensee Health Professional Home Address and/or Home Phone Number RCW 42.56.350(2)" (4 instances)
- 2 -- "DOH Licensee Social Security Number RCW 42.56.350(1)" (2 instances)

#### Redacted pages:

- Page 2, DOH Licensee Health Professional Home Address and/or Home Phone Number RCW 42.56.350(2), 1 instance
- Page 3, DOH Licensee Health Professional Home Address and/or Home Phone Number RCW 42.56.350(2), 1 instance
- Page 5, DOH Licensee Social Security Number RCW 42.56.350(1), 1 instance
- Page 6, DOH Licensee Social Security Number RCW 42.56.350(1), 1 instance
- Page 15, DOH Licensee Health Professional Home Address and/or Home Phone Number RCW 42.56.350(2), 1 instance
- Page 16, DOH Licensee Health Professional Home Address and/or Home Phone Number RCW 42.56.350(2), 1 instance

Compulsive sexual behaviour disorder in the ICD-11 - Kraus - 2018 - World Psychiatry - Wiley Online Library ONLINELIBRARY.WILEY.COM Like · Reply · 1m Write a reply... Cathy Sargent There was a Harvard University study using mice; when serotonin was extracted from mice brains: they became hyper sexual and they compulsively overate: quote by Dr Pat Allen: Like · Reply · Message · 15w Nikky Prause Please stop lying to people to line your pockets. You are behaving unethically and should have a complaint filed against you...oh, you're not licensed. Well, that makes sense. Reply · Unhide · 15w Nikky Prause Here is "sex addiction" removed from the ICD-11 beta as inaccurate, we agree http://www.thelancet.com/.../PIIS2215-0366(17.../abstract Reply · Unhide · 15w

