

CAUSE NO. 2019CI09367

DONALD L. HILTON JR                    §            IN THE DISTRICT COURT OF  
 Plaintiff                                    §  
    §  
 VS.    §            BEXAR COUNTY, TEXAS  
    §  
 NICOLE PRAUSE and LIBEROS LLC            §  
 Defendants                                §            408<sup>th</sup> JUDICIAL DISTRICT

**AFFIDAVIT OF LINDA HATCH, PH.D.**

My name is Linda Hatch. 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.

In 2017, Nicole Prause reported me to my licensing board. My response to my board details her allegations and my response. This case was closed by my board with no action being taken. This complaint caused me considerable anxiety, and is consistent with her tactic of attempting to silence any who do not agree with her perspective.

The section below is a verbatim quotation of the letter I sent to the State Board of Psychology Control. The facts outlined in this letter are based on my personal knowledge and are true and accurate.

May 12, 2017

**RE: Board of Psychology Control No. 600 2016 000405**

Dear Sir or Madam:

I am writing to respond to the complaint against me described in your letter of May 9, 2017 regarding Dr. Nicole Prause.

I will respond to each of the four allegations to the best of my ability.

(1) That I have been telling patients that Dr. Prause's research is/was funded by the pornography industry via my online blog.

I do not think I ever said that. The only thing I remember writing in this regard is from a section in a blog posted on March 23, 2015. It reads:

"The match-up between the size and power of the porn industry and the sex addiction treatment franchise is no contest. If pornography is a whale then sex addiction treatment is a paramecium. This is true even as the demand for sex rehab and counseling continues to grow... *Am I saying that the kind of hype that the pro porn researchers put out is bought and paid for? No. I don't know where the funding comes from.*" (Italics added)

In the same post I reported:

"... the adult industry and related internet platforms and apps aggressively seek out writers and researchers who may be willing to write things favorable to their interests. I know this because I was approached by a high profile online hook-up service about whether I would be willing to highlight findings favorable to infidelity in my writing [in



(2) That I have compared Dr. Prause to Hitler in a blog post.

I cannot imagine what this refers to. I have written a number of articles which attempt to analyze the possible mechanisms which might underlie various kinds of science denial. I have done this in an effort to explain the strong feelings and attitudes that are sometimes involved in the scientific debates around sexuality. Some of my writing has included references to the dynamics at work in other kinds of denial of established facts including the denial of climate change, of the holocaust, etc. This is not the same as comparing Dr. Prause to Hitler.

(3) That I emailed the society for Personality and Social Psychology regarding an upcoming conference in which Dr. Prause was scheduled to speak, expressing that I was "alarmed" that she was a speaker... that she is not a licensed psychologist and that her data had been discredited.

I cannot find a copy of that email in my records but I do remember writing something in that instance. It is possible that I believed that Dr. Prause was not a licensed psychologist because she got her license relatively recently and I may not have been aware of that at the time I wrote the email.

Nevertheless, it is my understanding that Dr. Prause is not trained to be a clinical psychologist. She may have had some exposure to patients as a student but she is clearly outside her area when she gives advice relating to psychotherapy and treatment. This includes online tweets in which she makes clinical recommendations to clients. She has also recommended that anyone in therapy for sex addiction should sue or report their therapist because they are being treated for a non-existent diagnosis.

If I said that her data or her work was discredited, it was probably because the research methodology of her studies have in fact received a great deal of criticism. Her studies have been criticized for being weak in areas such as operationalization of constructs, representativeness and screening of subjects, use of independent variables that do not validly relate to the particular experience being studied, misconstruing what predicted outcomes would be in addictive brain measures, and the drawing of conclusions that are not warranted by the data.

(4) That I have claimed to be a neuroscientist myself.

I don't believe I have ever claimed to be a neuroscientist. I started my career as an experimental social psychologist but after a year of teaching at UCLA and a one year postdoctoral fellowship, I went into clinical psychology working under supervision in a mental hospital. I became licensed in 1970 under the licensing board at the time which was the California Board of Medical Examiners. I have been in private practice, contract teaching, and forensic psychology since then. It is only in the last six years or so that I have worked in the addiction field after receiving training and certification through the International Institute for Trauma and Addiction Professionals (IITAP).

It may be that Dr. Prause is referencing the fact that I was one of the co-authors of a recent review article entitled "Neuroscience of Internet Pornography Addiction: A Review and Update". (*Behav. Sci.* **2015**, 5(3), 388-433; doi:[10.3390/bs5030388](https://doi.org/10.3390/bs5030388))

Although I am not a neuroscientist I believe that I am still capable of understanding a research article.

In sum, I am aware that Dr. Prause has targeted many of my colleagues in the field of sex addiction treatment. Her attacks have often seemed to me erratic and irresponsible. Not the least example of this is her persistent false claim that sex addiction therapists practice conversion/reparative therapy in work with homosexuals.

Dr. Prause has a right to advocate for whatever she believes. However, from what I understand she has focused legal attacks on and made bogus claims about a variety of perceived adversaries including self help websites, other researchers, reputable journals and educational institutions. In my case she has falsely claimed that I am "under investigation" by the APA and has had her lawyers threaten me with litigation.

Please let me know if you require anything further.

Respectfully,

Linda Hatch, PhD

VERIFICATION

STATE OF California §  
COUNTY OF Santa Barbara §

Before me, the undersigned Notary, Penny Spackman,  
on this 13 day of June, 2019, personally appeared Linda Hatch,  
known to me to be a credible person and of lawful age, who being by me first duly sworn,  
on his oath, deposes and says:

“My name is Linda Hatch. 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.”

[Signature]  
Linda Hatch

Subscribed and sworn to before me on this the 13 day of June, 2019.



[Signature]  
Notary Public in and for  
the State of California

My commission expires: 3-15-23