

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 STEFANIE CARNES

My name is Stefanie Carnes. 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 currently serve as the President of the International Institute for Trauma and Addiction Professionals (IITAP), a training institute and professional organization for addiction professionals. I also work as a senior fellow for Meadows Behavioral Healthcare, where I work with sexually addicted clients and their families. I hold a Ph.D. from The University of Georgia, I am a licensed marriage and family therapist, and I am an AAMFT approved supervisor. My area of expertise includes working with patients and families struggling with multiple addictions such as sexual addiction, eating disorders and chemical dependency. I am also a certified sex addiction therapist and clinical sexologist, specializing in therapy for couples and families struggling with sexual addiction. I present regularly at conferences at both the state and national levels. I am also the author of numerous publications including three books entitled: *Mending a Shattered Heart: A Guide for Partners of Sex Addicts*, *Facing Heartbreak: Steps to Recovery for Partners of Sex Addicts*, and *Facing Addiction: Starting Recovery from Alcohol and Drugs*.

As explained more fully below, Dr. Nicole Prause has repeatedly made false and defamatory accusations against me and IITAP. For example, in January 2017, Dr. Prause tweeted about me and IITAP regarding an article I helped author, stating that I lied in the article. She also created a fake logo for IITAP. True and accurate copies of the screen shots of Dr. Prause's comments are attached hereto as Exhibit "A". The logo Dr. Prause created/included in her tweet depicts a sock and states "IFAP before IITAP". "Fapping" is a slang word for masturbation, and the sock is also a reference to masturbation. In these tweets, Dr. Prause also states: "Therapists ignoring science since 1990". Dr. Prause has never attended an IITAP training and would not be familiar with the extensive amount of scientific literature used in the creation of our clinical materials. Her suggestion that our training ignores science is false. Indeed, our trainings meet continuing education requirements for the vast majority of the licensing boards and professional organizations in the United States, including the APA, NASW, and CAMFT. Dr. Prause's tweet and logo were clearly an effort to damage our reputation and interfere with our business.

Another example occurred in 2016, when Dr. Prause contacted a journal in which we published a paper on the psychometric properties of one of our assessment instruments. The day after a contentious interaction with me, and in an effort to retaliate, Dr. Prause contacted the publisher of the journal in which our paper was published, The Journal of Sexual Addiction and Compulsivity.



Without any evidence or basis, Dr. Prause stated that she believed that we had falsified our data, and she requested permission to replicate the data. We told the publisher that we would be happy to release the data to an independent statistician (which we did), but we would not release the data to Dr. Prause, as we knew her intent was solely malicious. The publisher, Taylor and Francis, did conduct a thorough statistical analysis of our data using an independent reviewer and determined that the data was not falsified. During the time when this analysis was conducted, Dr. Prause began to tweet false and negative statements about our instrument and organization. For example, she wrote: "Fraud discovered", stated that IITAP was "unable to produce data" and that the authors were "to face ethics charges". None of this was true. Additionally, she suggested that patients who were "paying for faux 'sex addiction' test" should consider filing a "complaint with the state board". Finally, she falsely maligned our sexual dependency inventory, by stating: "Have you paid to take this poor Sexual Dependency Inventory? Clinicians try to hide \$\$\$ scam". True and accurate copies of screen shots showing Dr. Prause's tweets are attached hereto and incorporated herein as Exhibit "B".

In fact, our testing instrument is a respected measure with numerous publications in the peer reviewed scientific literature supporting its use. Dr. Prause's statements were completely false and damaging to the reputation of our instrument. There is no effort by our clinicians to hide a money scam. We were able to produce our data, and there were no ethics charges against us or the publisher.

Dr. Prause has engaged in this type of behavior for years, and she has posted negative statements about our organization on various Internet forums. For example, in response to an article published in Psychology Today, she wrote that IITAP is "openly sexist and assaultive to scientists". Moreover, she compared our treatments to "snake oil" and stated that IITAP is "promoting profit, not treatments". Finally, she said that "IITAP/CSAT has been lying to you about this for years. It's time you asked them why they encourage sexism, stalking, and physically threatening scientists for profit". True and accurate screen shots of these and similar statements are attached and fully incorporated herein as Exhibit "C".

These statements and tweets written by Dr. Prause are false, malicious and designed to destroy my reputation as well as the reputations of the people who work with me. We are not "openly sexist" and we have never participated in "sexism, stalking, and physically threatening scientists for profit". We do not put "profits over patients" and do not engage in "snake oil" practices. All of these statements are designed to dismantle IITAP's reputation and discredit the work that we do.

Further Affiant sayeth not.

VERIFICATION

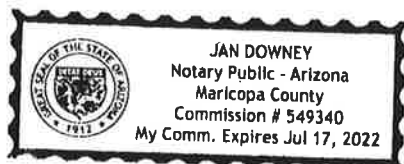
STATE OF Arizona §
COUNTY OF Maricopa §

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

"My name is Stefanie Carnes. 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."

Stefanie Carnes
Stefanie Carnes

Sworn to and subscribed before me on this the 17 day of July, 2019.



Jan Downey
Notary Public in and for
the State of Arizona

My commission expires: 7-17-22



Liberos

@NicoleRPrause

 Follow

@iitaplhc Made you a present! Happy New Year! #pornkillslove #FAP #pornaddiction #therapy #science #clinicaltrials #sock #RCT #sexaddiction



RETWEET

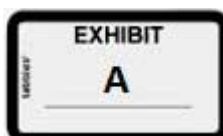
1

LIKES

2



8:37 AM - 4 Jan 2017



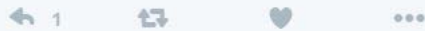


Meryl Moss @MerylMossMedia · 18h

Dr. Stefanie Carnes is doing great work with sex addiction.

BookTrib @BookTrib

The Great Sex #Addiction Wars - There Is More To The Story:
prn.to/2idMeM0 #sexualaddiction @iitapllc



Liberos

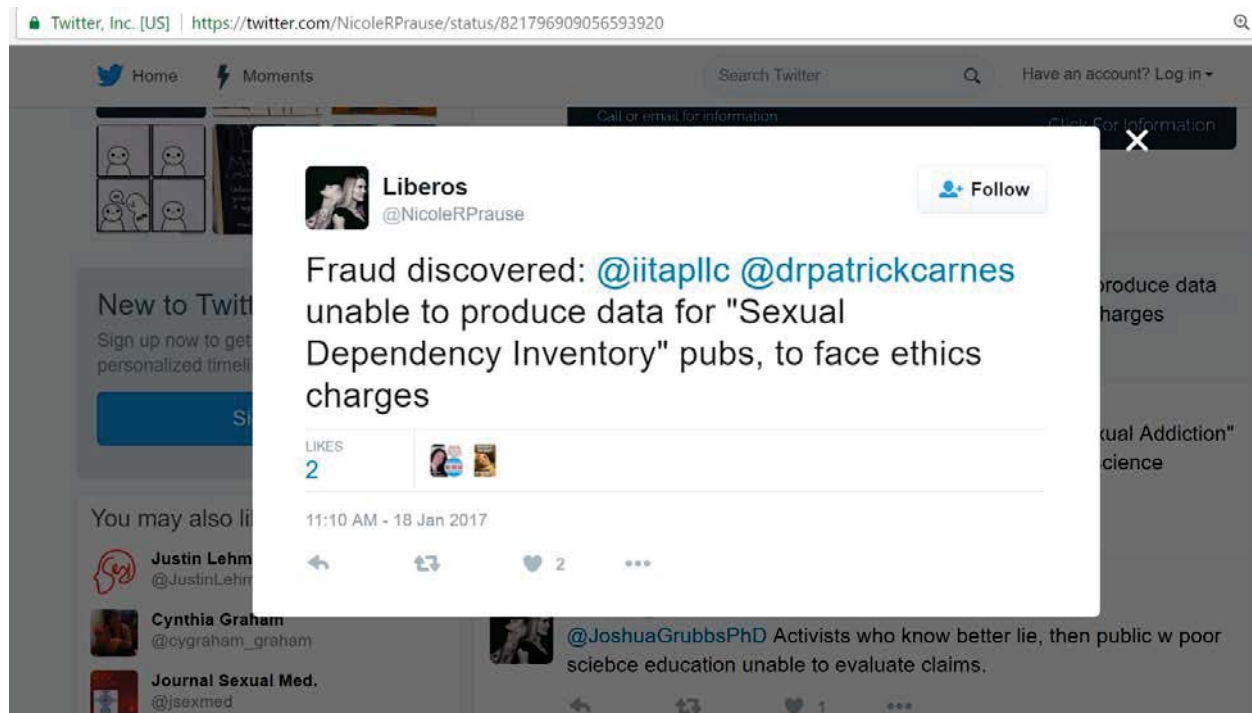
@NicoleRPrause

Follow

@MerylMossMedia #fakenews @DrStefCarnes
lied in release aasect.org/position-sex-a...
Well-known @IITAPllc profiteering tactics
deceiving patients



7:41 AM - 12 Jan 2017 from Los Angeles, CA





Dale Barr @dalejbarr · 21h

Under APA guidelines, the only people not entitled to see the data are the ones we entrust with safeguarding the literature (i.e. reviewers)

8.14 Sharing Research Data for Verification

(a) **After research results are published**, psychologists do not withhold the data on which their conclusions are based from other competent professionals who seek to verify the substantive claims through reanalysis and who intend to use such data only for that purpose, provided that the confidentiality of the participants can be protected and unless legal rights concerning proprietary data preclude their release. This does not preclude psychologists from requiring that such individuals or groups be responsible for costs associated with the provision of such information.

(b) Psychologists who request data from other psychologists to verify the substantive claims through reanalysis may use shared data only for the declared purpose. Requesting psychologists obtain prior written agreement for all other uses of the data.

8.15 Reviewers

Psychologists who review material submitted for presentation, publication, grant or research proposal review respect the confidentiality of and the proprietary rights in such information of those who submitted it.



3



29



47



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@NicoleRPrause



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@dalejbarr @MCSeto I still have @iitapllc APA authors refusing published data share bc they don't like statistician! Problems much deeper.

9:27 PM - 1 Mar 2017



Geoffrey Miller  @primalpoly · 5h

Patrick Carnes is a charlatan who monetizes sexual shame, and nobody takes him seriously in sex research, clinical psychology, or medicine.



1



10



Barbie  @Grama_B Barbie · 5h

Nope. That's not true. I have (sadly) personal experience with him as a clinician.

There are lots of shit therapists. He's not one.



3



Liberos

@NicoleRPrause

Follow

Replying to @Grama_B Barbie @primalpoly and 2 others

He doesn't use empirically supported therapies, gold standard of care. He tells pts they have a diagnosis that doesn't exist. His text grossly mischaracterizes prevalence & fails to offer any controls. They refuse to allow statisticians to review their scales vs. APA requirements.

4:24 PM - 24 Mar 2019

4 Likes



1



4



Tweet your reply



David J. Ley PhD  @DrDavidLey · 3h

Replying to @NicoleRPrause @Grama_B Barbie and 2 others

He also fails to follow informed consent by explaining to patients that his diagnosis and treatment is experimental with no evidence of effectiveness.



6





Liberos

@NicoleRPrause

 Fol

Patients paying for faux "sex addiction" test
consider filing complaint w state board
stopbadtherapy.com/main/boards.sh...

David Ley PhD @DrDavidLey

The Sexual Dependency Inventory - An Invalid Instrument | Psychology Today
psychologytoday.com/blog/women-who...

RETWEET

1

LIKES

2



6:34 PM - 31 Aug 2016



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@NicoleRPrause



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Have you paid to take this poor Sexual
Dependency Inventory? Clinicians try to hide
\$\$\$ scam...

[drdavidley.wordpress.com/2016/09/03/the](http://drdavidley.wordpress.com/2016/09/03/the-sexual-dependency-inventory-an-invalid-instrument/) ...
[@wordpressdotcom](https://www.wordpress.com)



"The Sexual Dependency Inventory – An Invalid Instrument..."

The below post was originally published on Psychology Today.
However, IITAP, and the sex addiction gurus who profit from the
SDI, threatened Psych Today and forced them to take it down. I...

drdavidley.wordpress.com

RETWEETS

3

LIKES

7



5:01 PM - 3 Sep 2016



Brad Gilbert · Marriage and Family Therapist (MFT) at Heart Healer Treatment Center

So true Barbara. You can even go to an open meeting of one of the 12 step groups and see the pain and the hope. There is little doubt in those rooms the reality for 1000's of people with this addiction.

Like · Reply · 1 · 21 hrs



Nikky Prause · CEO at Liberos

I never said people do not deserve help, but I refuse to allow snake oil to be sold to patients in pain. As you can see (below), IITAP/CSAT is promoting profit, not treatments.

Like · Reply · 11 hrs



Barbara Schoene · Claremont, California

Please just talk to some of the victims of Porn and Sex Addiction. They will share very real evidence that sexual addiction not only exists, it is distroying marriages, relationships and families.

Barbara Schoene LMFT,CCPS

Like · Reply · 2 · 22 hrs



Nikky Prause · CEO at Liberos

I am a licensed psychologist now and I did see some of the patients, as have my colleagues, whose lives were shattered by your treatments, not "porn". Anecdotes are never valuable beyond science. Your board members and practitioners are openly sexist and assaultive to scientists, so the issues are in IITAP/CSAT, not Psychology Today, including:



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SEXISM

<https://s3-us-west-1.amazonaws.com/.../SexismInNeuroscien...>

STEALING AND REPEATEDLY POSTING STOLEN PERSONAL PHOTOGRAPHS TO ENCOURAGE STALKING

<https://s3-us-west-1.amazonaws.com/.../Wilson...>

PHYSICAL THREATS REQUIRING PROTECTION AT PUBLIC TALKS

<https://s3-us-west-1.amazonaws.com/.../AASECT...>

FAKE FUNDING CLAIMS

You were told by your "trainers" that I received porn funding. I have never received such funding, and they knew it:

<https://s3-us-west-1.amazonaws.com/.../Cease...>

<https://s3-us-west-1.amazonaws.com/.../PressRelease...>

IITAP/CSAT has been lying to you about this for years. It's time you asked them why they encourage sexism, stalking, and physically threatening scientists for profit.

Like · Reply · 11 hrs · Edited





Liberos
@NicoleRPrause

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@iitapllc Needs more evidence so it made up something I never answered nor said? "Profits over patients" always, eh?

How can I overcome masturbation and/or porn addiction?

What are the best methods?



Nicole Prause, Ph.D., Neuroscientist and statistician studying human sexual behaviors
Updated just now

Originally Answered: How do I stop masturbating/watching porn? I can't/don't masturbate without watching porn. [Remove Banner](#)

The question I responded to as seen in the banner is "How do I stop masturbating/watching porn? I can't/don't masturbate without watching porn." IITAP today posted a false summary that I "recommended that someone with a porn addiction should go see a sex worker instead of masturbating to porn". Obviously, this is a lie and attempt of IITAP to protect profiting from patients told fake science to promote expensive treatments.

IITAP USES QUORA TO SUPPORT FAKE TREATMENT

4:17 PM - 14 Dec 2016 from [Chicago, IL](#)



Liberos
@NicoleRPrause

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[#SexAddictionIsReal](#) for therapists who value [#ProfitOverPatients](#) like [@iitapllc](#)

RETWEET
1

LIKES
4



10:23 AM - 19 Dec 2016 from [Los Angeles, CA](#)



1

4