

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 GEOFF GOODMAN, PH.D.**

My name is Geoff Goodman. 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.

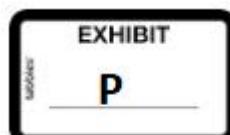
I hold a PhD, and am an associate professor of clinical psychology working with the doctoral program at Long Island University in Brookville, New York. I belong to the American Association of Sexuality Educators, Counselors, and Therapists (AASECT). AASECT hosts a listserv for members, and on this listserv I am a vocal proponent of sex addiction and the treatment of sex addiction. Occasionally, this viewpoint puts me at odds with some of my colleagues on this listserv. Roger Libby is a person on the listserv, and he mentioned Nicole Prause's research as proof that sex addiction does not exist. Here was my response:

"Roger, Nicole Prause's one EEG study does not refute many, many fMRI studies. Besides, EEG is very weak compared to fMRI, and to imply that her one exceptionally flawed study refutes so many others is ludicrous. For someone who emphasizes the importance of the science – that's not a very empirically based response. It's a deflection – fake news. Let's discuss the merits and flaws of the actual research, rather than hide behind Prause's apron strings."

Because Nicole Prause is not an AASECT member and therefore does not have access to this listserv, someone on the listserv must have forwarded my comment to her. She decided to file a Title IX complaint against me with the head of my Human Resources Department at Long Island University, my place of employment:

Dear Dr. Edwards,

I was recently made aware that your faculty member Geoff Goodman <http://www.liu.edu/CWPost/Academics/Faculty/Faculty/G/Geoffrey-D-Goodman> has been posting misogynist messages about my research on a professional Listserv for the American Association of Sexuality Educators, Counselors, and Therapists. Specifically, he stated to these hundreds of professionals: "Let's discuss the merits and flaws of the actual research, rather than hide behind Prause's apron strings."



I have run an independent neuroscience laboratory since 2007, mostly at universities, publishing in high-impact, peer-reviewed journals. As I study the effects of sex films on the brain, I am a constant target for misogyny from anti-porn activists like Dr. Goodman. I receive rape threats, stalking treats, and have had to make FBI and police reports in the course of conducting my research due to these threats to my safety.

My colleagues on the AASECT ListServ reported his misogyny to the moderators and shared his misogynist message with me. I am reporting it to Long Island University so that his sexist language does not affect other female scientists with whom he disagrees.

I am open to share any documentation you need to address this issue with Dr. Goodman.

Nicole Prause, Ph.D.  
Liberos <http://www.liberoscenter.com>  
323.919.0783

She then followed up with an e-mail message to my Psychology Department chair, Nancy Frye:

Dear Dr. Frye,

I hope you will follow up with your Title IX office regarding your faculty member Geoffrey Goodman (see below). I will be.

Nicole Prause, Ph.D.  
Liberos <http://www.liberoscenter.com>  
323.919.0783

A Title IX complaint is a serious matter and could potentially destroy a person's reputation and career. In my case, Dr. Prause's false complaint went to my department chair and ultimately, to the Dean. Thus, I had to defend myself by demonstrating that the allegations against me were false and that the real reason behind Dr. Prause's complaint was that I disagreed with her on the issue of sex addiction. Fortunately, the school took no action against me, but the entire ordeal caused me considerable stress, inconvenience and anxiety.

Further affiant sayeth not.

## VERIFICATION

STATE OF New York  
COUNTY OF *Nassau*

Before me, the undersigned Notary, Trevor Guillecote, on this day personally appeared Geoff Goodman, 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 Geoff Goodman. 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."

Ron Hora

Geoff Goodman, Ph.D.  
Associate Professor  
Clinical Psychology  
Doctoral Program  
Long Island University  
720 Northern Blvd.  
Brookville, NY 11548

Subscribed and sworn to before me on this the 11 day of June, 2019.

**Notary Public in and for  
the State of New York**

My commission expires: 6/15/2021

**TREVA Y GUILLAUME**  
Notary Public, State of New York  
No. 01GU6359690  
Qualified in Queens County  
Commission Expires 08/05/2024