

CAUSE NO. 2019CI09367

DONALD L. HILTON JR
Plaintiff

VS.

NICOLE PRAUSE and LIBEROS LLC
Defendants

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IN THE DISTRICT COURT OF

BEXAR COUNTY, TEXAS

408th JUDICIAL DISTRICT

HADDAD Lt

AFFIDAVIT OF LAILA MICKELWAIT WITH EXODUS CRY

HADDAD Lt

My name is Laila Mickelwait. I am over the age of 18 years of age, and am of sound mind, am personally familiar with the facts stated herein, and am fully capable of making this affidavit. I swear under penalty of perjury that the statements contained herein are based on my person knowledge and are true and accurate.

I am the Director of Abolition for an organization called Exodus Cry, which is dedicated to the education about and eradication of commercial sexual exploitation and sex trafficking. In February 2019, I had begun ramping up twitter posts regarding the researched based harms of pornography. Nicole Prause apparently disliked our message because she used her own Twitter account to encourage her followers to file fraud complaints against Exodus Cry with the Missouri Attorney General’s office. She further wrote that she had already filed such a complaint with the Missouri Attorney General’s office. A true and accurate screen shot of these statements is attached hereto as Exhibit “A”.

On Feb 26, 2019 we were notified by several of our business partner donors that Nicole Prause had been personally emailing them with completely fabricated claims. For example, she falsely wrote:

“Exodus Cry members were sending ‘rape’ and ‘stalking’ threats to scientists online who study sex films. In particular author Laila Mickelworth [sic] was personally claiming that I fake my studies and am in pornography myself.”

Nicole Prause continued her email by stating: “Obviously neither is true and it shows a willingness to promote stalking and libel to promote a cause you never agreed to assist.” A true and accurate copy of the email Ms. Prause she sent to April Kolanchick is attached hereto and incorporated into this affidavit as Exhibit “B”. April Kolanchick is one of Exodus Cry’s partner/donors.

Of course, the allegations Nicole Prause made against me in this email and on twitter are completely false. I have never made any kind of rape or stalking threats to Nicole Prause or anyone else. In fact, I have never had any direct contact or conversation with Prause at any time either in person, online, by phone or via e-mail.

In her email, Nicole Prause also claimed without any factual basis that Exodus Cry’s CEO salary is “far in excess of acceptable compensation rates for non-profits” and that Exodus Cry is “now under investigation for fraud by the Missouri Attorney General.” Both claims are demonstrably false. Exodus Cry’s statement regarding executive pay is attached and incorporated herein as Exhibit “C”.



I have personal knowledge that the factual representations made in this statement are true. I also know of no evidence to suggest that Exodus Cry or anyone affiliated with the organization is under any kind of investigation by any law enforcement agency including the Attorney General of Missouri.

I have read some of the literature authored by Nicole Prause, and know from such literature that she does not support the notion that pornography can be addicting. Based on her well-publicized views, the timing of our efforts to educate the public about the harms of pornography, and the timing of Nicole Prause's false statements, the media she used and her target audience (Exodus Cry's financial donors and the public at large), I believe that the only reasonable explanation for her conduct is that she disagreed with the substance of what we were doing and that she made the false statements in an effort to silence us. I am unaware of any personal motive or any other reason Nicole Prause would make such false statements other than her desire to silence/harm our organization.

VERIFICATION

STATE OF COLORADO §
COUNTY OF Summit §

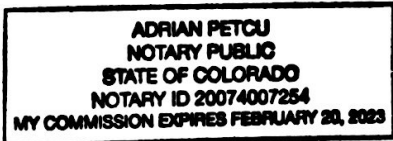
Before me, the undersigned Notary, Adrian Petcu, on this day personally appeared Laila Mikelwait, known to me to be a credible person and of lawful age, who being by me first duly sworn, on her oath, deposes and says:

AKA HADAD LH

"My name is Laila Mikelwait. 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]
Laila Mikelwait HADAD LH

Subscribed and sworn to before me on this the 12th day of JUNE, 2019.



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

My commission expires: 02/20/2023



Liberos
@NicoleRPrasse

Follow

You can file complaint here:
ago.mo.gov/app/Complaints...
it just takes a few minutes. Their
fraudulent mission statement for their
5013c that is actually anti-pornography
is attached.



6:31 PM - 25 Feb 2019

1 Retweet



----- Forwarded message -----

From: April Kolanichick <nico@sweetandsaucywife.com>
Date: Tue, Feb 26, 2019 at 8:11 AM
Subject: Fwd: New Message From April Kolanichick
To: Jennifer Guthrie <jennifer.guthrie@exoduscry.com>

Good morning Jennifer,

I wanted to bring it to your attention that I received this email this morning. I thought you may want to know that your partners are being contacted. As always, there are two sides to every story and very often these days information is fabricated. I'm only forwarding you this email so that you know we are all being contacted directly and the accusations that are being made.

Thank you for all that you do.
April

Begin forwarded message:

From: "Dr. Nicole Prause" <nico@sweetandsaucywife.com>
Subject: New Message From April Kolanichick
Date: February 25, 2019 at 10:54:47 PM CST
To: nico@sweetandsaucywife.com
Reply-To: "Dr. Nicole Prause" <nicole.prause@gmail.com>

You are listed as a partner with Exodus Cry:
<https://exoduscry.com/about/partner-businesses/>

This organization has \$2.3 million and pays its CEO \$96,000/year (IRS 2017). This is far in excess of acceptable compensation rates for non-profits. They are now under investigation for fraud by the Missouri Attorney General.

We became aware of this fraud because the Exodus Cry members were sending "rape" and "stalking" threats to scientists online who study sex films. In particular, author Lella Mische worth was personally claiming I take my studies and am in pornography myself. Obviously, neither is true, and it shows a willingness to promote stalking and libel to promote a cause you never agreed to assist.

I doubt you want to support a group defrauding its donors. I will send any documentation you have difficulty finding to support each claim, if you would like to review it.

Dr. Nicole Prause





Liberos

@NicoleRPrause

Follow

Curious about the anti-pornography Exodus Cry? \$2.2 million, mostly in donations, covering a 6-figure CEO salary. They are enriching themselves and pretending to be fighting #pornography and #trafficking

Time to contact the attorney general for fraud.

apps.irs.gov/app/eos/

(A) Name and Title	(B) Average Salary per Year (or other basis for compensation) (see Section 1361)	(C) Director, officer, or key employee (or other person in control or substantial influence) (see Section 1361)				(D) Significant compensation from the organization (see Section 1361)	(E) Significant compensation from related organizations (see Section 1361)	(F) Estimated amount of other compensation from the organization and related organizations
		(1) Director	(2) Officer	(3) Key employee	(4) Other person in control or substantial influence			
(1) JAMES L. LAMBERT DIRECTOR AND CHAIRMAN	0.00	0	0	0	0	0	0	
(2) JAMES LAMBERT DIRECTOR	0.00	0	0	0	0	0	0	
(3) JAMES LAMBERT DIRECTOR	0.00	0	0	0	0	0	0	
(4) JAMES LAMBERT DIRECTOR	0.00	0	0	0	0	0	0	
(5) JAMES LAMBERT DIRECTOR	0.00	0	0	0	0	0	0	

6:21 PM - 25 Feb 2019

Retweets 14 Likes



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