

Annex 18

From: [Alan McKee](#)
To: [Alisa C. Simmons](#)
Cc: [Elizabeth Serrano](#); [John Naber](#)
Subject: Re: Unauthorized Use of Your Brain On Porn
Date: Thursday, May 2, 2019 1:16:13 AM

Hi Alisa,

I have instructed Nicole Prause to remove my name from this website.

Alan

From: "Alisa C. Simmons" <ASimmons@fitcheven.com>
Date: Thursday, 2 May 2019 at 3:53 pm
To: Alan McKee <Alan.McKee@uts.edu.au>
Cc: Elizabeth Serrano <ESerrano@fitcheven.com>, John Naber <JNaber@fitcheven.com>
Subject: Unauthorized Use of Your Brain On Porn

Dear Dr. McKee,

Please see the attached letter.

We look forward to hearing from you.

Kind regards,
Alisa

Alisa C. Simmons | Partner

FITCH EVEN

Fitch, Even, Tabin & Flannery LLP

120 South LaSalle Street, Suite 2100 | Chicago, Illinois 60603

P 312.629.7947 | F 312.577.7007

asimmons@fitcheven.com | www.fitcheven.com

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**DEPARTMENT OF
PSYCHOLOGICAL AND
BRAIN SCIENCES**

INDIANA UNIVERSITY
Bloomington

May 7, 2019

Via Email (Alisa C. Simmons - ASimmons@fitcheven.com)
Confirmation sent by United States Postal Service

Alisa C. Simmons
Partner
Fitch Even Tabin & Flannery
120 South LaSalle Street
Suite 2100
Chicago, Illinois 60603

Re: Unauthorized use of YOUR BRAIN ON PORN
Ref. Np. 8956-145727

Dear Alisa Simmons,

I do not own, or have any part in the operation of, the website RealYourBrianOnPorn.com. I am simply listed as an expert on this website. I was asked by Dr Nicole Prause in early April 2019 if I minded being listed on this site as an expert in addictions as it relates to pornography. I do not own, operate, or have any contributions to any social media website, account, or platform that is related to RealYourBrianOnPorn.com or that discusses RealYourBrianOnPorn.com or YOUR BRAIN ON PORN.

Since Dr Nicole Prause asked me if I didn't mind being listed as an expert on the website the RealYourBrianOnPorn.com, I have asked her to remove me from the list of expert on that site. I have no interest in being associated with the RealYourBrianOnPorn.com website or Mr Gary Wilson and his websites that involve YOUR BRAIN ON PORN.

Sincerely

Peter R Finn, PhD
Professor
Psychological and Brain Sciences
Indiana University
finnp@indiana.edu

FITCH EVEN



Fitch, Even, Tabin & Flannery LLP
120 South LaSalle Street
Suite 2100
Chicago, Illinois 60603
312.577.7000
312.577.7007 fax
info@fitcheven.com
www.fitcheven.com

Alisa C. Simmons
312-577-7000
Asimmons@fitcheven.com

May 1, 2019

*Via Email (finnp@indiana.edu)
Confirmation by U.S. Mail and Courier*

Dr. Peter Finn
Department of Psychological and Brain Sciences
Psychology Building 156
1101 E. 10th St.
Bloomington, IN 47405-7007

Re: Unauthorized Use of YOUR BRAIN ON PORN
Our Ref. No. 8956-145727

Dear Dr. Finn:

We represent Mr. Gary Wilson (doing business as Your Brain On Porn) in connection with his intellectual property rights. As you know, our client owns and uses the trademarks YOUR BRAIN ON PORN; the YOUR BRAIN ON PORN Logo, ; and YBOP in connection with providing educational services and providing information about pornography and its effects on viewers and has done so since 2010. Your Brain On Porn owns and uses the web address www.YourBrainOnPorn.com and uses it to provide the Your Brain On Porn brand services.

Your Brain On Porn has widely used these trademarks to identify the source of its educational materials, information, and resources relating to risks associated with pornography use, including addiction. Your Brain On Porn also features the YOUR BRAIN ON PORN trademark and logo on the series of publications and educational materials authored by Mr. Wilson providing information about pornography and its effects on viewers. Your Brain On Porn has invested significant resources in building and promoting its trademarks as reliable source identifiers for its services.

It has recently come to our attention that you, along with other colleagues, have adopted and started using the brand name Real Your Brain On Porn and the web address RealYourBrainOnPorn.com to provide information and resources about pornography and its effects on viewers. Your group uses the web address RealYourBrainOnPorn.com to redirect Internet users to the "Science of Arousal" website identifying you and your colleagues as experts, where you provide information and resources about pornography. A banner at the top of the pages of the website at the RealYourBrainOnPorn.com web

address features the wording “Welcome to The Real Your Brain On Porn” (copy attached). This website



features the stylized logo, , for your services. Your group also features Real Your Brain On Porn on social media (Twitter, Facebook, YouTube, Tumblr) to promote its services and website. The April 18, 2019, press release announcing and promoting the RealYourBrainOnPorn.com website (copy attached) advertises and identifies the listed experts as “Scientists and therapists specially trained in sexuality have merged their knowledge to support media, students, and consumers previously misled by inaccurate health information about pornography.” While you and your colleagues have the right to offer competing views on pornography and the effects of viewing pornography, you do not have the right to use our client’s trademark to do so.

Copying our client’s YOUR BRAIN ON PORN trademark as part of the alleged Real Your Brain On Porn brand name and logo and in the web address RealYourBrainOnPorn.com for your services and website unfairly and inaccurately suggests to consumers that you and your website are the authentic resource for the Your Brain On Porn brand goods and services, when in fact that is not the case. Holding your group of experts and website out as “Real Your Brain On Porn” will cause consumers and the public to mistake you and your services, website and resources as those of Your Brain On Porn. Under the present circumstances, we believe that consumer confusion is likely. Under U.S. trademark law, trademark infringement claims may be based on these underlying facts. Liability for infringement can include treble damages and attorney’s fees.

To protect Your Brain On Porn’s rights and to prevent consumer confusion, we request your immediate cooperation and demand that you immediately stop promoting your group as the “Real Your Brain On Porn” and stop use of “Real Your Brain On Porn” in all forms of advertising and media. To assure our client of your cooperation, we need you to undertake these actions and confirm in writing that you have done so:

- (1) Stop using YOUR BRAIN ON PORN wording as part of the brand name for your business and services and stop offering, promoting, and providing any services in connection with marks, names, or logos that include the wording YOUR BRAIN ON PORN or REAL YOUR BRAIN ON PORN or any confusingly similar wording;
- (2) Stop using the web address RealYourBrainOnPorn.com (and any similar web addresses) to offer services relating to pornography and its effects or relating to the fields of psychology, sociology, pathology, sexology, neuroscience and addiction and transition to a new web address that does not include the wording YOUR BRAIN ON PORN or any confusingly similar wording;
- (3) Remove from advertising and promotional materials, including but not limited to websites and social media sites (including social media user names) any marks, logos, or slogans featuring YOUR BRAIN ON PORN, REAL YOUR BRAIN ON PORN , “The Real Your Brain On Porn,” YBOP, RYBOP, Brain On Porn, and any other confusingly similar marks;
- (4) (4) Remove from social media sites, including, but not limited to, Twitter (<https://twitter.com/BrainOnPorn>), Reddit (<https://www.reddit.com/user/sciencearousal>), Facebook (<https://www.facebook.com/realyourbrainonporn/>), Tumblr, and YouTube

Dr. Peter Finn

May 1, 2019

Page 3 of 3

(<https://www.youtube.com/channel/UCncvrqWoXG1TyGkQ02O2OMg>), any existing tweets, communications, comments or videos promoting Real Your Brain On Porn and the website RealYourBrainOnPorn.com;

- (5) Refrain going forward from using YOUR BRAIN ON PORN or REAL YOUR BRAIN ON PORN and any confusingly similar wording as source identifiers for your products and services;
- (6) Refrain from search engine optimization on the wording YOUR BRAIN ON PORN and REAL YOUR BRAIN ON PORN; and
- (7) Refrain from disparagement and defamation of YOUR BRAIN ON PORN and its principal and associates.

We look forward to receiving your cooperation and your providing your assurances in writing to the undersigned by no later than May 10, 2019. Failure to cooperate and any continued use of trademarks confusingly similar to Your Brain On Porn's trademarks in connection with promoting and providing the your services will cause greater harm to our client and will be considered as an intentional, willful infringement of Your Brain On Porn's trademark rights. Willful trademark infringement can result in heightened damages awards and awards of attorney fees in trademark infringement litigation. This letter is not intended as a complete statement of the facts or of Your Brain On Porn's rights, remedies, and causes of action, all of which are expressly reserved.

We look forward to hearing from you or your representative and receiving your cooperation and written assurances.

Sincerely,

Fitch Even Tabin & Flannery LLP



Alisa C. Simmons

Enclosures

DATA ANEC

Sexuality often is a source of panic in the United States. When the vibrator appeared, the panic was that women would no longer get married or have children.

Today, the panic is over pornography or, more neutral, sex films. Getting good information about sex films is very difficult. Many people claim expertise without possessing any. Groups make millions of dollars claiming to "fight" sex films based on "science", yet work with no scientists. While there are dozens of anti-pornography organizations, there is no advocacy group for sex film's positive health effects.

We are a group of experts trained in and/or researching the effects of sex films. We do not advocate for (or against) viewing sex films as any blanket recommendation. We are willing to connect with media and colleagues, to provide accurate, balanced, science-based information.

Avoid the Damian Sandler error, talk to experts in sexuality!





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Document title: Your Brain on Porn | YBOP Relapse - Science of Arousal and Relationships

Capture URL: <https://www.realyourbrainonporn.com/>

Captured site IP: 198.185.159.145

Page loaded at (UTC): Thu, 18 Apr 2019 16:54:13 GMT

Capture timestamp (UTC): Thu, 18 Apr 2019 16:54:42 GMT

Capture tool: v6.9.2

Collection server IP: 54.174.78.137

Browser engine: Chrome/62.0.3202.9

Operating system: Microsoft Windows NT 10.0.14393.0 (10.0.14393.0)

PDF length: 3

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April 2019

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New website "RealYourBrainOnPorn.com" launches for scientifically accurate information about pornography

Scientists and therapists specially trained in sexuality have merged their knowledge to support media, students, and consumers previously misled by inaccurate health information about pornography.

ASHLAND, Ore. - April 18, 2019 - *PRLog* -- Have you ever read science claiming that pornography is addictive because it "burns out your dopamine", then been confused because you cannot find a diagnosis for "porn addiction" in either the World Health Organization or American Psychiatric Association? You are not alone. Pornography addiction actually has been rejected as a codified diagnosis by every major diagnostic body and rejected by scientists, but misinformation online is rampant.

In the last five years, anti-pornography groups have spent millions of dollars marketing fake science to consumers, then profit by selling untested therapies, anti-pornography apps, and books. This stops now.

Scientists and therapists who are experts in human sexuality have come together to provide accurate information to the public in www.realyourbrainonporn.com. The website introduces the [basic principles of science](#), links to [studies summarized by the professors who wrote them](#), then links you to dozens of scientists and therapists ready to connect (<http://www.realyourbrainonporn.com/> experts). These experts include the principle investigator for the first research-based porn literacy curriculum for youth, the first person to coin the expression "sex positive", the first neuroscience lab to test the addiction model of pornography, and the lab that demonstrated porn did not impact partner satisfaction in the largest pre-registered, failure-to-replicate in the field of human sexuality. Experts' background includes terminal degrees in addictions, communications and media, sociology, psychology, neuroscience, and physiology, among others.

If you have ever read news about pornography and thought it sounded a *little* too breathless, a *bit* over the top, or possibly completely fabricated, you are the majority. It is time to correct this public misinformation. Now you have a free resource to share with others!

Connect with us on the website, Twitter (<https://twitter.com/BrainOnPorn>), Facebook, YouTube, or Tumblr, with more resources being added as we expand our library.

Contact

Real Your Brain On Porn
***@gmail.com

Photo:
<https://www.prlog.org/12765427/1>

----- End -----



Source : Real Your Brain On Porn

Email : ***@gmail.com ✓

Tags : Pornography Addiction, Pornography Relapse, Your Brain On Porn

Industry : Education

Location : Ashland - Oregon - United States

Subject : Projects

Account Email Address ✓ Account Phone Number ✓ [Disclaimer](#) [Report Abuse](#)

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Fitch, Even, Tabin & Flannery LLP
120 South LaSalle Street
Suite 2100
Chicago, Illinois 60603
312.577.7000
312.577.7007 fax
info@fitcheven.com
www.fitcheven.com

Alisa C. Simmons
312-577-7000
Asimmons@fitcheven.com


May 1, 2019

Via Email (Alan.McKee@uts.edu.au)

Dr. Alan McKee
ADMIN Faculty Administration
University of Technology Sydney
PO Box 123
Broadway NSW 2007

Re: Unauthorized Use of YOUR BRAIN ON PORN
Our Ref. No. 8956-145727

Dear Dr. McKee:

We represent Mr. Gary Wilson (doing business as Your Brain On Porn) in connection with his intellectual property rights. As you know, our client owns and uses the trademarks YOUR BRAIN ON PORN; the YOUR BRAIN ON PORN Logo, ; and YBOP in connection with providing educational services and providing information about pornography and its effects on viewers and has done so since 2010. Your Brain On Porn owns and uses the web address www.YourBrainOnPorn.com and uses it to provide the Your Brain On Porn brand services.

Your Brain On Porn has widely used these trademarks to identify the source of its educational materials, information, and resources relating to risks associated with pornography use, including addiction. Your Brain On Porn also features the YOUR BRAIN ON PORN trademark and logo on the series of publications and educational materials authored by Mr. Wilson providing information about pornography and its effects on viewers. Your Brain On Porn has invested significant resources in building and promoting its trademarks as reliable source identifiers for its services.

It has recently come to our attention that you, along with other colleagues, have adopted and started using the brand name Real Your Brain On Porn and the web address RealYourBrainOnPorn.com to provide information and resources about pornography and its effects on viewers. Your group uses the web address RealYourBrainOnPorn.com to redirect Internet users to the "Science of Arousal" website identifying you and your colleagues as experts, where you provide information and resources about pornography. A banner at the top of the pages of the website at the RealYourBrainOnPorn.com web

address features the wording “Welcome to The Real Your Brain On Porn” (copy attached). This website



features the stylized logo, , for your services. Your group also features Real Your Brain On Porn on social media (Twitter, Facebook, YouTube, Tumblr) to promote its services and website. The April 18, 2019, press release announcing and promoting the RealYourBrainOnPorn.com website (copy attached) advertises and identifies the listed experts as “Scientists and therapists specially trained in sexuality have merged their knowledge to support media, students, and consumers previously misled by inaccurate health information about pornography.” While you and your colleagues have the right to offer competing views on pornography and the effects of viewing pornography, you do not have the right to use our client’s trademark to do so.

Copying our client’s YOUR BRAIN ON PORN trademark as part of the alleged Real Your Brain On Porn brand name and logo and in the web address RealYourBrainOnPorn.com for your services and website unfairly and inaccurately suggests to consumers that you and your website are the authentic resource for the Your Brain On Porn brand goods and services, when in fact that is not the case. Holding your group of experts and website out as “Real Your Brain On Porn” will cause consumers and the public to mistake you and your services, website and resources as those of Your Brain On Porn. Under the present circumstances, we believe that consumer confusion is likely. Under U.S. trademark law, trademark infringement claims may be based on these underlying facts. Liability for infringement can include treble damages and attorney’s fees.

To protect Your Brain On Porn’s rights and to prevent consumer confusion, we request your immediate cooperation and demand that you immediately stop promoting your group as the “Real Your Brain On Porn” and stop use of “Real Your Brain On Porn” in all forms of advertising and media. To assure our client of your cooperation, we need you to undertake these actions and confirm in writing that you have done so:

- (1) Stop using YOUR BRAIN ON PORN wording as part of the brand name for your business and services and stop offering, promoting, and providing any services in connection with marks, names, or logos that include the wording YOUR BRAIN ON PORN or REAL YOUR BRAIN ON PORN or any confusingly similar wording;
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- (3) Remove from advertising and promotional materials, including but not limited to websites and social media sites (including social media user names) any marks, logos, or slogans featuring YOUR BRAIN ON PORN, REAL YOUR BRAIN ON PORN , “The Real Your Brain On Porn,” YBOP, RYBOP, Brain On Porn, and any other confusingly similar marks;
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Dr. Alan McKee

May 1, 2019

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We look forward to hearing from you or your representative and receiving your cooperation and written assurances.

Sincerely,

Fitch Even Tabin & Flannery LLP



Alisa C. Simmons

Enclosures

DATA ANALYSIS

Sexuality often is a source of panic in the United States. When the vibrator appeared, the panic was that women would no longer get married or have children.

Today, the panic is over pornography or, more neutral, sex films. Getting good information about sex films is very difficult. Many people claim expertise without possessing any. Groups make millions of dollars claiming to "fight" sex films based on "science", yet work with no scientists. While there are dozens of anti-pornography organizations, there is no advocacy group for sex film's positive health effects.

We are a group of experts trained in and/or researching the effects of sex films. We do not advocate for (or against) viewing sex films as any blanket recommendation. We are willing to connect with media and colleagues, to provide accurate, balanced, science-based information.

Avoid the Damian Sandler error, talk to experts in sexuality!



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PDF length: 3

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April 2019

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ready to connect (<http://www.realyourbrainonporn.com/> experts). These experts include the principle investigator

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If you have ever read news about pornography and thought it sounded a *little* too breathless, a *bit* over the top, or possibly completely fabricated, you are the majority. It is time to correct this public misinformation. Now you have a free resource to share with others!

Connect with us on the website, Twitter (<https://twitter.com/BrainOnPorn>), Facebook, YouTube, or Tumblr, with more resources being added as we expand our library.

Contact

Real Your Brain On Porn

***@gmail.com

Photo:

<https://www.prlog.org/12765427/1>

----- End -----



Source : Real Your Brain On Porn

Email : ***@gmail.com ✓

Tags : Pornography Addiction, Pornography Relapse, Your Brain On Porn

Industry : Education

Location : Ashland - Oregon - United States

Subject : Projects

Account Email Address ✓

Account Phone Number ✓

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Captured site IP:	174.129.23.171
Page loaded at (UTC):	Fri, 26 Apr 2019 16:45:55 GMT
Capture timestamp (UTC):	Fri, 26 Apr 2019 16:46:10 GMT
Capture tool:	v6.9.2
Collection server IP:	52.7.109.102
Browser engine:	Chrome/62.0.3202.9
Operating system:	Microsoft Windows NT 10.0.14393.0 (10.0.14393.0)
PDF length:	2
Capture ID:	1d44e179-5992-41f7-b7f0-bc55077ed01b
User:	fitcheven-user4