



Alisa Simmons, Esq.
asimmons@fitcheven.com

October 4, 2019

*Via Email (wgiampietro@giampietrolaw.com)
Confirmation by U.S. Mail*

Mr. Wayne B. Giampietro
Poltrock & Giampietro
123 W. Madison Street, Suite 1300
Chicago, IL 60602

Re: Response to August 27, 2019 Letter on behalf of Mr. Burgess and Dr. Prause

Dear Mr. Giampietro:

We acknowledge that we received your August 27, 2019 letter sent on behalf of your clients, Mr. Burgess and Dr. Prause and provide the following in response on behalf of Mr. Wilson (doing business as Your Brain On Porn). We respond first to the false and libelous statements that you made in your August 27, 2019, letter. We then address the actions recently taken by a website and social media that appears to be under the control of your clients, which impugns Mr. Wilson's reputation.

August 27, 2019 letter

The false statements that you made about our client in your August 27, 2019 letter include the second and third sentences of that letter. You falsely stated:

1. That Mr. Wilson illegally interfered with your client's [Mr. Burgess'] website;
2. That Mr. Wilson illegally altered the archives of your client's [Mr. Burgess'] website, www.realyourbrainonporn.com;
3. That Mr. Wilson provided public instructions for others to alter illegally the archives of your client's [Mr. Burgess'] website.

You and your client also published these false statements via Twitter within a half hour of your firm emailing us your August 27, 2019, letter. Your and your client's statements listed above are false and actionable. Mr. Wilson assures us that he has never "interfered with" the content of the website www.realyourbrainonporn.com or the archives for that website. Nor has he claimed that Mr. Burgess or Dr. Prause inserted pornographic material "on his website." You do not offer evidence to support either claim.

In his August online communications, Mr. Wilson demonstrated how false archive entries can be attributed to an existing archive. This was done to counteract the false archive listings someone created for Mr. Wilson's website. These false, nonexistent URL addresses (with no underlying

content) could be inserted into the list of archived URL addresses captured in the Wayback archive. This can apparently be accomplished for any website's page in the archive, and can thus be employed maliciously to smear anyone whose website pages have been archived.

The fake archives were designed to fraudulently make it appear that Mr. Wilson had engaged with Mormon porn subject matter. In response to your clients' vocal, public campaign falsely insisting that Mr. Wilson inadvertently created hundreds of URL addresses on his site by viewing porn, Mr. Wilson demonstrated the following:

- He tweeted a screenshot showing that it is easy to create and insert false URL addresses on the archive for his YourBrainOnPorn.com site on the Wayback archive.
- He tweeted a screenshot showing that someone else had subsequently created at least two false URL addresses on the RealYourBrainOnPorn.com Wayback archive page.
- He revealed the "//" coding ruse in the false "porn" URL addresses, which ensured that the offensive, fake URL addresses all rose to the top of the 100,000-page collection of URL addresses in the Wayback archive related to YourBrainOnPorn.com.

None of his actions could possibly constitute interference in *your client's* website. They were done only to demonstrate the malice of whoever inserted the false URL addresses into the Wayback archive page for www.yourbrainonporn.com, which false materials were promoted solely and extensively via your clients' social media. Nor was Mr. Wilson responsible for the sample fake URL-address insertions on the RealYourBrainOnPorn archive page, which he shared on Twitter. He merely publicized their existence after learning of them, in order to undermine your client's ongoing campaign to impugn his reputation on your client's social media account by insisting that fake URLs couldn't be posted to the Wayback archive.

Email and "Brain On Porn" Twitter campaign

As you know, when Mr. Wilson filed his UDRP complaint, WIPO revealed that Mr. Burgess has been holding the domain name registration for and the URL www.realyourbrainonporn.com since at least April, 2019. Mr. Burgess apparently controls the existing website with Dr. Prause, as you mentioned this fact in your August 27, 2019 letter, despite previously misrepresenting to us that she was not involved in the site.

We presume that Mr. Burgess also controls both the website's email function, which uses an alias based on the other name of Mr. Burgess' website www.sciencearousal.com (before he switched to the www.realyourbrainonporn.com address), and all of the social media accounts that use the name "Real Your Brain On Porn" and derivations thereof. That email account and corresponding social media participated in the campaign to impugn Mr. Wilson's character.

Email – Amid the aforementioned social media campaign to persuade people that Mr. Wilson is a reckless porn user with unsavory porn tastes, your clients sent the following email, which they knew was untrue, on August 22, 2019, using Mr. Burgess' domain. The recipient forwarded it to Mr. Wilson:

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

From: **Real Your Brain On Porn** <sciencearousal@gmail.com>

Date: Thu, Aug 22, 2019 at 1:02 PM

Subject: NCOSE speaker posts "mormon" p*rn
To: <PUBLC@ncose.com>

One of you frequent speakers, Gary Wilson, has a public collection of "mormon porn texts" on his website yourbrainonporn.com

You can view the content using this search:

web.archive.org/web/*/yourbrainonporn.com/*

Filter/search for "Mormon" to show the pornography content. He has not provided any reason other than he accidentally uploaded his own porn searches to his anti-porn website.

He may have joined the movement to get access to those girls. He has not denied that the text was on his website; he only claims that it is some conspiracy against him. This is what predators do.

These claims of professional and sexual misconduct are without authentic support (as explained above), and are harmful to our client's reputation particularly in his profession.

Social media

While an alleged "Ron Swanson" was the first to publicize the tale about the false URL addresses (screenshot #1 below), Dr. Prause sent tweets containing false information about the false URL addresses (screenshot #2), which was swiftly followed by a Twitter rampage that lasted for days (involving more than 100 tweets), conducted by a Twitter account that we think is controlled by Mr. Burgess or Dr. Prause, <https://twitter.com/BrainOnPorn>. This Twitter campaign attempted to spread and legitimize the groundless campaign based on false Mormon porn URLs (with no underlying content).

In addition to the character-impugning campaign conducted by the @BrainOnPorn Twitter account, that Twitter account also explicitly accused our client of at least 3 felonies (screenshots attached):

- Stalking women in person
- Making death threats, and
- Hacking into websites.

As your clients know, to falsely, publicly accuse people of sexual/professional misconduct and criminal action in the nature of felonies is actionable in itself. In fact, if a tribunal deems such actions "defamation *per se*," Mr. Wilson need not show any commercial damages in order to recover. Mr. Wilson is separately considering the remedies open to him to seek redress for your clients' actions. Settlement terms as to these facts would need to be addressed separately from the proposed settlement concerning Mr. Wilson's trademark.

This letter is not intended as a complete statement of the facts or of Mr. Wilson's rights, remedies, and causes of action, all of which are expressly reserved.


Sincerely,
Fitch Even Tabin & Flannery LLP







Alisa C. Simmons
Enclosures
cc: John M. Naber, Esq.


Enclosures

<https://twitter.com/BrainOnPorn/status/1165717297157169152>

**LblForWomen** @lblwcricri · 5h

This may surprise you but I went through your entire garbage account and your harassment of Gary earlier. Whichever idiot is behind this account - if you think your targeting of one writer isn't obvious you're either stupid or desperate

 2   1 





**Real Your Brain on Porn** @BrainOnPorn

Replying to @lblwcricri @YourBrainOnPorn and @LailaMickelwait

"one writer" you mean the one who


- 1) lied he's a professor
- 2) lied his account was hacked with porn
- 3) lied he taught a college class
- 4) was told by ACLU to stop harassing us
- 5) has many FBI and police reports for stalking
- 6) promotes antisemitism that sends death threats to us

1:07 PM · Aug 25, 2019 · [Twitter Web App](#)

+++++

<https://twitter.com/BrainOnPorn/status/1165737553531531264>





**Real Your Brain on Porn**
@BrainOnPorn

Replying to @BrainOnPorn @lblwcric and 2 others

Every statement is 100% accurate:
Wilson has no degree, stalks, regularly threatens scientists, promotes anti-semitism resulting in death threats (never renounced), never taught class, lies @ being professor to media & on his website, & has Mormon porn links on his 2016/7 site.



URL	MIME TYPE	FROM	TO	CAPTURES	DUPLICATES	UNIQUES
http://www.yourbrainonporn.com/beautiful-mormon-woman-showing-off/	text/html	Mar 25, 2016	Mar 25, 2016	1	0	1
http://www.yourbrainonporn.com/beautiful-mormon-woman-showing-off/feed/	text/html	Apr 17, 2016	May 29, 2016	3	2	1
http://www.yourbrainonporn.com/beautiful-blonde-mormon-milf/	text/html	Apr 11, 2016	Apr 11, 2016	1	0	1
http://www.yourbrainonporn.com/big-and-perky-mormon-boobs-with-puffy-nipples/	text/html	Jun 11, 2016	Jun 11, 2016	1	0	1
http://www.yourbrainonporn.com/big-and-perky-mormon-boobs-with-puffy-nipples/feed/	text/html	Jun 11, 2016	Jun 11, 2016	1	0	1
http://www.yourbrainonporn.com/big-tit-mormon-wife-with-no-garments/	text/html	May 31, 2016	May 31, 2016	1	0	1
http://www.yourbrainonporn.com/big-tit-mormon-wife-with-no-garments/feed/	text/html	May 31, 2016	May 31, 2016	1	0	1
http://www.yourbrainonporn.com/blonde-married-mormon-on-her-back/	text/html	Mar 3, 2016	Feb 17, 2017	2	1	1
http://www.yourbrainonporn.com/blonde-married-mormon-on-her-back/feed/	text/html	Feb 24, 2017	Feb 24, 2017	1	0	1
http://www.yourbrainonporn.com/closeup-of-tight-mormon-pussy/	text/html	Mar 3, 2016	Feb 24, 2017	2	1	1
http://www.yourbrainonporn.com/closeup-of-tight-mormon-pussy/feed/	text/html	Feb 24, 2017	Feb 24, 2017	1	0	1
http://www.yourbrainonporn.com/creamy-hairy-mormon-teen-pussy/	text/html	Apr 18, 2016	May 29, 2016	3	2	1
http://www.yourbrainonporn.com/creamy-hairy-mormon-teen-pussy/feed/	text/html	Apr 25, 2016	Apr 25, 2016	1	0	1
http://www.yourbrainonporn.com/cute-innocent-mormon-teen/	text/html	Mar 3, 2016	Mar 25, 2016	2	1	1
http://www.yourbrainonporn.com/cute-innocent-mormon-teen/feed/	text/html	Apr 12, 2016	Apr 12, 2016	1	0	1
http://www.yourbrainonporn.com/cute-mormon-flashing-tits/	text/html	Mar 3, 2016	Mar 3, 2016	1	0	1

2:27 PM · Aug 25, 2019 · Twitter Web App




+++++

<https://twitter.com/BrainOnPorn/status/1165652192511983616>

**The Big Guy**  @Ryback22 · 14h


No worries at all and could see that. Would love to have you on sometime. Lots of great insight with the book! Thank you

**Gary Wilson** @YourBrainOnPorn · 15h

Replying to @Ryback22

I just see that you were contacted by my mentally unstable cyberstalker. Its a troll account that is engaged in trademark infringement calling itself "Real" yourbrainonporn.
In the last 24 hours it has tweeted 50 times about me.
Sorry about that.

3 4 24

**Real Your Brain on Porn** @BrainOnPorn

Replying to @Ryback22

Be sure to ask

- 1) his qualifications (none, no degree, never taught own class even)
- 2) how many stalking FBI and police reports (he claims none,yet court records them)
- 3) why he keeps appearing on antisemitic shows while we get antisemitic death threats (he's sending them)

8:48 AM · Aug 25, 2019 · [Twitter Web App](#)

+++++

<https://twitter.com/BrainOnPorn/status/1165384791690113024>



Real Your Brain on Porn
@BrainOnPorn

Replying to @BrainOnPorn @ACLU and 3 others

Gary Wilson is bragging about committing fraud on our website. Screenshots saved for attorneys and law enforcement.

He still cannot back date, "Mormon porn" links on his site from 2016 and 2017 could not have been hacked. Real.

@SASH1234 is this how you want to be represented?

File

View

History

Bookmarks

Tools

Help

The Official Team Schedule Home / Twitter

Applied Machine Workday Machine Search Results for "mormon" +

https://web.archive.org/web/20170303000000/http://www.yourbrainonporn.com/

Back

Forward

Home

Stop

Reload

https://web.archive.org/web/20170303000000/http://www.yourbrainonporn.com/

Print

Share

Star

16

17

18

19

20

21

22

23

24

25

26

27

28

29

30

31

32

33

34

35

36

37

38

39

40

41

42

43

44

45

46

47

48

49

50

51

52

53

54

55

56

57

58

59

60

61

62

63

64

65

66

67

68

69

70

71

72

73

74

75

76

77

78

79

80

81

82

83

84

85

86

87

88

89

90

91

92

93

94

95

96

97

98

99

100

http://www.yourbrainonporn.com/advertising/	SearchIndex	Mar 5, 2016	Mar 12, 2016	3	2	1
http://www.yourbrainonporn.com/beautiful-mormon-woman-sho-wing-off/	SearchIndex	Mar 25, 2016	Mar 25, 2016	1	0	1
http://www.yourbrainonporn.com/beautiful-mormon-woman-sho-wing-off/feed/	SearchIndex	Apr 17, 2016	May 29, 2016	3	2	1
http://www.yourbrainonporn.com/beautiful-blonde-mormon-mil/	SearchIndex	Apr 11, 2016	Apr 11, 2016	1	0	1
http://www.yourbrainonporn.com/big-and-perky-mormon-boobs-with-puffy-nipples/	SearchIndex	Jun 11, 2016	Jun 11, 2016	1	0	1
http://www.yourbrainonporn.com/big-and-perky-mormon-boobs-with-puffy-nipples/feed/	SearchIndex	Jun 11, 2016	Jun 11, 2016	1	0	1
http://www.yourbrainonporn.com/big-tt-mormon-wife-with-no-g-aments/	SearchIndex	May 31, 2016	May 31, 2016	1	0	1
http://www.yourbrainonporn.com/big-tt-mormon-wife-with-no-g-aments/feed/	SearchIndex	May 31, 2016	May 31, 2016	1	0	1
http://www.yourbrainonporn.com/blonde-married-mormon-on-h-er-back/	SearchIndex	Mar 3, 2016	Feb 17, 2017	2	1	1
http://www.yourbrainonporn.com/blonde-married-mormon-on-h-er-back/feed/	SearchIndex	Feb 24, 2017	Feb 24, 2017	2	0	1
http://www.yourbrainonporn.com/closeup-of-tight-mormon-puss y/	SearchIndex	Mar 3, 2016	Feb 24, 2017	2	1	1
http://www.yourbrainonporn.com/closeup-of-tight-mormon-puss y/feed/	SearchIndex	Feb 24, 2017	Feb 24, 2017	1	0	1
http://www.yourbrainonporn.com/comments/feed/	SearchIndex	Feb 28, 2016	Aug 1, 2019	11	3	8
http://www.yourbrainonporn.com/creamy-hairy-mormon-teen-p ussy/	SearchIndex	Apr 18, 2016	May 29, 2016	3	2	1
http://www.yourbrainonporn.com/creamy-hairy-mormon-teen-p ussy/feed/	SearchIndex	Apr 25, 2016	Apr 25, 2016	1	0	1
http://www.yourbrainonporn.com/cute-innocent-mormon-teen/	SearchIndex	Mar 3, 2016	Mar 25, 2016	2	1	1
http://www.yourbrainonporn.com/cute-innocent-mormon-teen/f eed/	SearchIndex	Apr 12, 2016	Apr 12, 2016	1	0	1
http://www.yourbrainonporn.com/cute-mormon-flashing-bits/	SearchIndex	Mar 3, 2016	Mar 3, 2016	1	0	1
http://www.yourbrainonporn.com/cute-young-blonde-on-the-fla o/	SearchIndex	Mar 3, 2016	Mar 3, 2016	1	0	1

Time here to search

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

30

31

32

33

34

35

36

37

38

39

40

41

42

43

44

45

46

47

48

49

50

51

52

53

54

55

56

57

58

59

60

61

62

63

64

65

66

67

68

69

70

71

72

73

74

75

76

77

78

79

80

81

82

83

84

85

86

87

88

89

90

91

92

93

94

95

96

97

98

99

100

11:58 AM

3:06 PM · Aug 24, 2019 · [Twitter Web App](#)

1 Retweet 1 Like

<https://twitter.com/BrainOnPorn/status/1165580492336316416>



Real Your Brain on Porn @BrainOnPorn · 3h

Replying to @Ryback22 and @YourBrainOnPorn

If repetition is the standard, see his "enemies" list, including a young female scholar he attacked just 2 days ago, or neuroscientist he has over 10,000 (!) times on his site. We can find him a psychiatrist, but stalking & threats w law enforcement were what he preferred.




1



Real Your Brain on Porn @BrainOnPorn · 2h

ACLU agrees with us. Wilson is harasser. we are sick of it. Four of us got antisemitic death threats. Wonder where those came from? Wilson refuses to renounce.



AMERICAN CIVIL LIBERTIES UNION
FOUNDER
Southern California
June 21, 2019

Via E-Mail
Ms. Alisa C. Simmons
Fitch, Even, Tabin & Flannerty LLP

Re: Your May 1, 2019 letter

Dear Ms. Simmons:

The demand in your May 1, 2019 letter to a group of academics and practitioners associated with the web site Real Your Brain on Porn that they "[r]efrain from disparagement and defamation of YOUR BRAIN ON PORN and its principal and associates" is misguided for numerous reasons.

To the extent you are using disparagement to mean criticism or belittlement, as it is ordinarily defined, the request is improper. Criticism is protected by the First Amendment to the United States Constitution in the absence of both a provably false statement of fact about the person who claims he was injured, and the requisite level of fault, such as negligence or malice.

But, even if you are using disparagement to refer to a legal tort such as commercial disparagement, there is no basis to suggest that Real Your Brain on Porn has ever disparaged Your Brain on Porn, its principal, Mr. Gary Wilson, or his associates. First, the website does not mention Your Brain on Porn except in a disclaimer on the bottom of page of the website that states, "This web page has no relationship with yourbrainonporn.com." Nor does the website ever mention Mr. Wilson or his associates. To prevail on a claim of disparagement, however, a plaintiff generally needs to show that there is both a false or misleading statement and that it specifically refers to the plaintiff. See, e.g., *Harford Casualty Ins. Co. v. Swift Distribution*, 59 Cal.4th 277, 293-94 (2014). Because Real Your Brain on Porn does not refer to Your Brain on Porn (except in the no relationship disclaimer), Mr. Wilson, or his associates or make any false statements about them, there is no basis for you to demand that the publisher of the website or anyone associated with it refrain from disparagement of Your Brain on Porn, Mr. Wilson, or his



¹Douglas Brian Harvey, MFT, CST, CST-S, James Cantor, PhD, Lynn Cornelis, PhD, Chris Doughan, PhD, Peter Fink, PhD, William Fisher, PhD, Janelle Georgiadis, PhD, Victoria Hartman, PhD, MPH, David Harsh, PhD, Erick Janssen, PhD, Marty Klein, PhD, Taylor Kohut, PhD, Justin Lehoullier, PhD, David J. Ley, PhD, CST, CST-S, Roger Libby, PhD, CST, Alan McKee, PhD, Charles Meuser, PhD, MD, Samuel Perry, PhD, Nicole Prasse, PhD, Anna Randall, DEd, MSW, MPH, Aleksander Seibuller, PhD, Jennifer Vail, PhD, Julia Voth, PhD, Michael A. Vigorito, LMFT, CGP, CST, and Jason Winters, PhD.


<https://dailystormer.name/tag/gary-wilson/>

Tor Home Tor BBS Contributions Contact ES

Tag Archives: Gary Wilson

Gnostic Media Podcast: An Interview with Your Brain on Porn[®]

 Daily Stormer  February 3, 2014



Gnosti
the dan