

Exhibit 10

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION

ALEXANDER RHODES)	Case No.
)	
<i>Plaintiff,</i>)	
v.)	Civil Action No. 2:19-cv-01366
)	
NICOLE PRAUSE)	
)	<i>Electronically Filed</i>
and)	
)	
LIBEROS LLC)	
)	
<i>Defendants</i>)	

DECLARATION OF STACI SPROUT

My name is Staci Sprout. 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 am a licensed psychotherapist (Licensed Independent Clinical Social Worker, or LICSW), a Certified Sex Addiction Therapist, and am the author of the book, *Naked in Public: A Memoir of Recovery From Sex Addiction and Other Temporary Insanities*. My book and much of my work is intended to provide hope and help to people who suffer from sexual addiction. As detailed more fully below, I have been attacked online and have been falsely accused by Nicole Prause, I believe because I disagree with her on the issue of whether pornography is addictive.

I. Harassing Complaints to Regulatory Bodies

Dr. Prause made three formal complaints against me to regulatory bodies: two to the Washington State Department of Health, and one to the National Association of Social Workers. In each case, the complaints contained false accusations against me.

A. Complaints by Dr. Prause against me to the Washington State Department of Health

Dr. Prause made an unfounded complaint to the Washington State Department of Health on January 24, 2018, which was dismissed without investigation. Among other things, she falsely claimed that I engaged in “false advertising to patients” “intentional misinformation” and that I violated “numerous standards of care”. From the terms of her communication to the Department of Health, her real concern was that I teach people that sex addiction is a genuine problem that can be overcome with proper therapy and help. Dr. Prause disagrees and made false complaints to the

Washington State Department of Health because of such disagreement. A true and accurate copy of the complaint is attached and incorporated herein as Exhibit "A".

Dr. Prause made a second unfounded complaint to the Washington State Department of Health on June 13, 2018. Again, her complaint was closed without investigation. I have never before or since been accused of wrongdoing or ethical misconduct since I began my professional social work career in 1994.

B. Complaint to the National Association of Social Workers

In the summer of 2018, Dr. Prause filed a formal complaint to the National Association of Social Workers about me for ethical violations. Again, the gist of the complaint was that I was spreading false information and taking advantage of my clients because my therapy practice is dedicated to helping adults heal from sex/relationship addiction, intimacy avoidance, and betrayal trauma. This complaint was also dismissed because it lacked merit. I note that Dr. Prause included a wide volume of screen shots in her complaint, which indicated to me that she was cyberstalking my work with malicious intent.

II. Public Bullying, Harassment, and Libel

I have had several uncomfortable exchanges with Nicole Prause online. For example, my second contact with her was discovering a comment on a post (about the International Classification of Diseases-11 consideration of the Compulsive Sexual Behavior Disorder diagnosis) that Dr. Prause had made on my Facebook author page, defaming me by accusing me of lying, fraud, other unethical behavior, and practicing without a license. I am not "friends" with her on Facebook; it is a public page, and she sought me out to comment there. A true and accurate copy of a screen shot of her comments is attached and incorporated herein as Exhibit "B" to this declaration.

It is a core value for me to find compassion for all people who feel oppressed. I believe Ms. Prause is casting herself in this role as part of her ongoing campaign to intimidate those who disagree with her. In actuality, she is the offender. This is a chronic pattern for which Ms. Prause is already under legal pursuit.

Lastly, I have recently been served with a copy of a lawsuit filed by Ms. Prause against me in the Los Angeles County Small Claims Court in California. Ms. Prause makes several unsubstantiated claims that I am *defaming her* and misrepresented to the Court that I do business in California, in order to try and gain jurisdiction over me.

As preparation for my defense to this and any further legal or other attacks by Ms. Prause, I have prepared the following statement:

**This is a true and accurate account of the bullying, harassment, defamation and blame-shifting
perpetrated by Nicole Prause to me, Staci Sprout**

1-21-2020

My name is Staci Sprout. I own two businesses, a private psychotherapy practice and Recontext Media, a publisher and platform for online education.

I am writing to state that I have not defamed nor am I guilty of the wrongful allegations of libel or slander made against me by Nicole Prause. I created this statement to document her pattern of online harassment and defamation of *me*, starting in 2017. Her latest demand that I pay her \$10,000 or she will take legal action against me felt like extortion. In this letter I am summarizing my history of her attacks, false reports, and defamation. Far more evidence of her pattern of attacking and making false claims against *not just me but many other professionals* who disagree with her has also been carefully documented here, [starting at least in 2013](#).

I have never met Ms. Prause in person, nor has she been a psychotherapy client of my private practice. After enduring her online attacks and false reports against me, I eventually began to stand up for myself. I published facts online about her harassment of me, disagreed with her opinions, and made true public statements as an online educator and activist. I also stood up for colleagues she has attacked. That is not defamation.

Her recent demand letter and filing a small claims suit three days later appears to be more attempts to intimidate me, this time adding financial threats. She continually uses nuisance claims and deceptive complaints in systems and organizations, forcing me to defend myself. It is exhausting.

OUR FIRST ENCOUNTER: HER ONLINE BULLYING - 2017

My first experience with Ms. Prause was when she posted a critical tweet in response to one of mine in November 2017. She used the account "Liberos@NicoleRPrause" to publicly name me and disagree with something I had posted on my public twitter account. I responded to her as a comment on her twitter post to debate the issue. Within a few exchanges it was

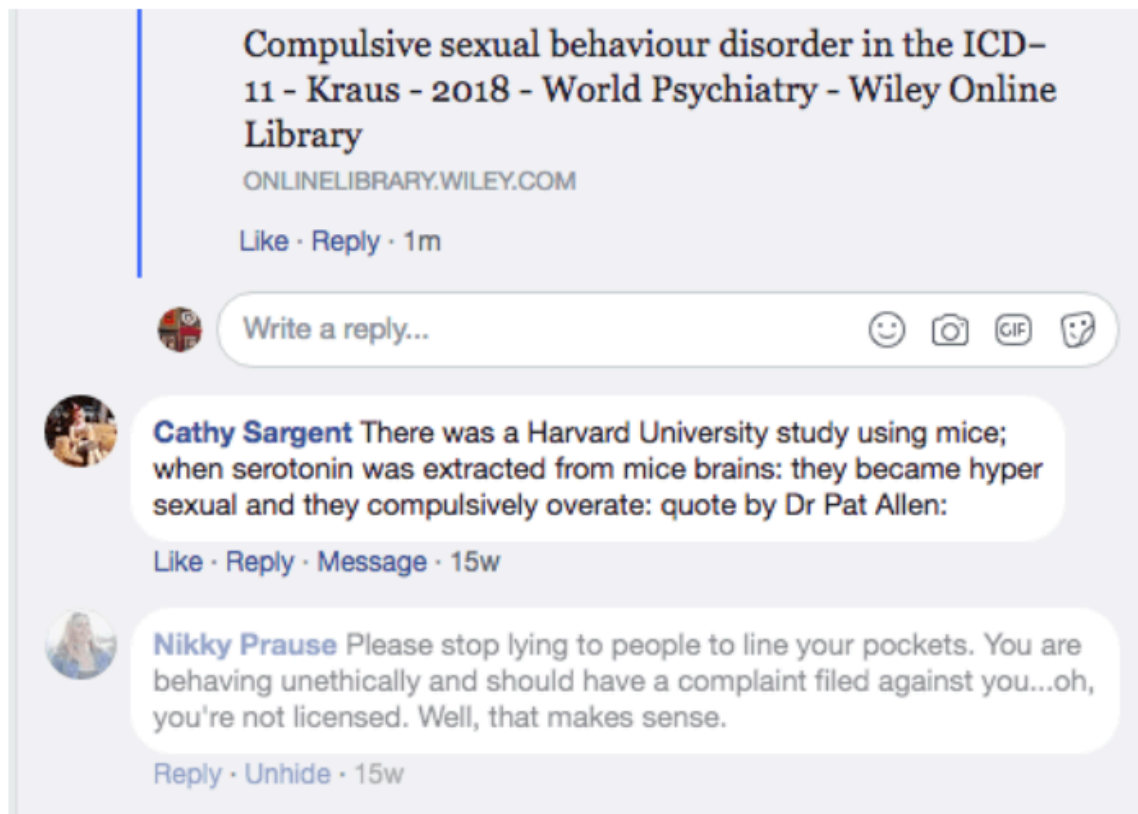
clear to me she was not interested in genuine dialogue. In fact, I experienced her as

an intellectual bully, and I responded by immediately blocking her on twitter. I have a personal policy to block people who are abusive in any way, or attempt to be.

If I had known I would be facing two years of harassment after that, I would have taken a screen shot of this first exchange.


INACCURATELY ACCUSING ME OF PRACTICING WITHOUT A LICENSE - 2018

Ms. Prause also made a false accusation on my public Facebook author page in 2018, after I posted an article from World Psychiatry, saying that I was “lying to line [my] pockets” and that I “should have had a complaint filed against [me]” and stating, “...oh, you’re not licensed. Well, that makes sense.” Her comment is greyed out below because I quickly blocked her on Facebook so she could no longer harass me there. My post was not about her at all, it was an article on the Compulsive Sexual Behavior Disorder diagnosis being considered by the World Health Organization – yet she personalizes so much of what I do as an online educator.



Her statement was untrue that I was practicing without a license.

In fact I am a Licensed Independent Clinical Social Worker in the state of Washington in good standing, first certified on 1/14/1997 and licensed on 7/22/2001.



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The Washington Department of Health presents this information as a service to the public. This site provides disciplinary actions taken and credentials denied for failure to meet qualifications. If the Enforcement Action column is 'No', there has been no disciplinary action. It allows viewing and downloading of related legal documents since July 1998. Contact our Public Records Office at PDRC@doh.wa.gov for information on actions before July 1998. This information comes directly from our database. It is updated daily.

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Credential Information for: Sprout, Staci Leanne

Credential	Credential Type	First Issue Date	Last Issue Date	Expiration Date	Credential Status	Enforcement Action
LW00006544	Social Worker Independent Clinical License	07/22/2001	03/27/2019	04/21/2020	ACTIVE	No



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[NEW SEARCH](#)
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Credential Information for: Sprout, Staci Leanne

Credential	Credential Type	First Issue Date	Last Issue Date	Expiration Date	Credential Status	Enforcement Action
SW40002790	Social Worker Certificate	01/14/1997		07/19/2001	EXPIRED	No

MS. PRAUSE FILES THREE FALSE NUISANCE COMPLAINTS AGAINST ME TO REGULATING BODIES - 2018

In the 25 years of practice since earning my Master's Degree in Social Work, I have never had a complaint filed against me for any reason, until hers. Both of hers – after the first one was dropped without investigation, she quickly filed a second complaint, also dropped.

Though I have never met Ms. Prause nor treated her for therapy, she has made three formal ethics complaints against me to my licensing or professional organizations. All three claims she reported were closed without investigation for having no merit:

- 1) An unfounded complaint to the WA Department of Health dated January 24, 2018, "closed without action."
- 2) A second unfounded complaint to the WA Department of Health later that year, "closed without action."
- 3) Another unfounded complaint to the National Association of Social Workers, where I am a member in good standing – also dropped without formal investigation.

Letter dismissing complaint #1:



STATE OF WASHINGTON
DEPARTMENT OF HEALTH

February 22, 2018

Nicole Prause
nicole.prause@gmail.com

Subject: Report No: 2018-1442 Social Worker Independent Clinical License

Dear Nicole Prause:

The department carefully reviewed your report about Staci Sprout in accordance with the disciplinary process under Washington's Uniform Disciplinary Act (chapter 18.130 RCW). We closed this report without an investigation or disciplinary action. If the allegations are true, no violation of the law occurred.

The law allows you one opportunity to ask that we reconsider our decision. To do so, you must provide new information about your original report within 30 days of receiving this letter. After 30 days, we will treat any new information as a new report. Please send any new information to the Department of Health, Office of Investigation and Inspection, Case Management, P.O. Box 47874, Olympia, WA 98504-7874.

You have the right to request any publicly disclosable information contained in the file. To do so, submit a written request to the Department of Health, Public Disclosure and Records Center, P.O. Box 47865, Olympia, WA 98504-7865; fax 360-586-2171; email pdrc@doh.wa.gov.

If you have questions, please contact Kitty Slater-Einert at (360) 236-4730 or email kitty.slater@doh.wa.gov.

Sincerely,

Health Systems Quality Assurance
Complaint Intake Unit

Letter dismissing complaint #2 was similar to the letter above, dated four months later:



STATE OF WASHINGTON
DEPARTMENT OF HEALTH

June 13, 2018

Staci Leanne Sprout
1818 Westlake Ave N Ste 118
Seattle, WA 98109-2707

Subject: Report No: 2018-8046 Social Worker Independent Clinical License

Dear Staci Sprout:

The department received and reviewed a report alleging you committed unprofessional conduct. We closed this report without an investigation or disciplinary action. If the allegations are true, no violation of the law occurred. This report will not appear on our provider credential search webpage because we took no action against your credential.

We carefully reviewed the report in accordance with the disciplinary process under Washington's Uniform Disciplinary Act (chapter 18.130 RCW). We may reconsider this decision if we receive new information or identify a pattern of similar concerns.

We have notified the person who filed the report of this decision. Because of state law RCW 43.70.075, we may not be able to release information about the person who filed the report. We cannot release details of the report via telephone or email.

You have the right to request any publicly disclosable information contained in the file. To do so, submit a written request to the Department of Health, Public Disclosure and Records Center, P.O. Box 47865, Olympia, WA 98504-7865; fax to 360-586-2171; email pdrc@doh.wa.gov.

You may submit a written statement to include in the file. Your statement may be subject to public disclosure.

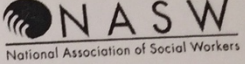
If you have questions, please contact Kitty Slater-Einert at (360) 236-4730 or email kitty.slater@doh.wa.gov.

Sincerely,

Health Systems Quality Assurance
Complaint Intake Unit

Letter dismissing complaint #3:

750 First Street NE Suite 800 Washington, DC 20002-4241
202.408.8600 » SocialWorkers.org

 **NASW**
National Association of Social Workers

**CERTIFIED
CONFIDENTIAL**

Decision of the NEC Intake Subcommittee
November 6, 2018

Re: #18-009
PRAUSE
vs.
SPROUT

The NEC Intake Subcommittee considered the above-referenced Request for Professional Review (RPR) Self-Report and has decided to not accept it for review.

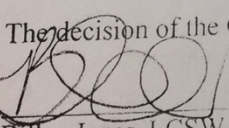
The reason for this decision is that the specific criteria for acceptance (see *NASW Procedures for Professional Review Revised, chapter 4.A.*) was not met (this is the required criterion for acceptance, regardless of whether the matter is referred to mediation or adjudication):

- The Complainant was engaged in a professional social work relationship with the NASW member and was directly affected, personally or professionally, by the alleged violation of the NASW Code – OR – the Complainant has direct knowledge of the alleged violation stated in the RPR
- The complaint rises to the level of an ethical violation requiring consideration by NASW's professional review process

You may wish to pursue other avenues of redress, since the NASW is unable to assist you. Many states have licensure laws that provide a channel for filing a complaint of unethical conduct. You may want to consider filing a complaint with the state regulatory board at the following address:

Health Systems Quality Assurance Complaint Intake
P.O. Box 47857
Olympia, WA 98504-7857
Phone: 360-236-4700 | **Email:** HSQAComplaintIntake@doh.wa.gov

The decision of the Committee is final and cannot be appealed. This matter is now considered closed.


Billye Jones, LCSW
Chair, NEC Intake Subcommittee

11/6/18
Date

MS. PRAUSE IS SUED FOR DEFAMATION BY A COLLEAGUE FOR 10 MILLION DOLLARS, I CONTRIBUTE SWORN AFFIDAVIT - 2019

After being forced to address these false reports, even though they were all dropped without formal investigation, I sought support from other colleagues who had been similarly attacked by her – I know of more than a dozen, and there are far more out there I do not know. I was then asked to share my harassment experiences by a neurosurgeon colleague who had filed suit against her for *defamation per se*, for ten million dollars in damages.

I agreed, and filed [a sworn affidavit in this defamation lawsuit](#) about my experiences up to that time.

MS. PRAUSE IS SUED A SECOND TIME FOR DEFAMATION - 2019

I am now preparing a second affidavit for another defamation lawsuit against Ms. Prause by yet another victim of her relentless bullying. I was introduced to this young man by a mutual colleague, and felt concern for his suffering as a result of her harm to him. I offered to help him raise money for his legal campaign fundraiser, and recorded a video telling the truth about what's been going on. [To date he has received over \\$84,000](#) in donations to support his case, for his legal fees.

I suspect my activism on his behalf led to Ms. Prause escalating her targeting me to not just deceptive statements and false complaints, but now adding financial demands and intimidation.

MS. PRAUSE SENDS DEMAND LETTER FOR \$10,000 - 2019

Ms. Prause then sent me a letter demanding that I owed her \$10,000, for a list of claims that are either clearly false, or simply true things I have said.

She sent a similar demand letter to a news organization that published an unflattering story about her, stating they owed her \$10,000 also. Criticism based on true actions is not defamation, it is the outcome of being a public figure.

December 20, 2019

Staci Sprout
c/o Recontext Media
1818 Westlake Avenue North, Suite 118
Seattle, WA 98109

Dear Ms. Sprout:

Please be advised that you owe me the sum of \$10,000.00 because of defamation and violations of the California Safe at Home provisions. Within the last year, you have made numerous false and defamatory statements, including:

- 1) someone suing Dr. Prause would "be awarded damages from PornHub"
- 2) pitched a national journalist to try to get him to write a story "investigating ties between PornHub and [Dr. Prause]"
- 3) "RYBOP is cozy with Pornhub?! Prause is key connector"
- 4) "There is widespread denial about [Prause's employer] sexual abuse of children, esp in the sex therapy field."
- 5) "Who has already been reported to the CA board of Psychology for ethical misconduct and harassment"
- 6) "It's been painful to be stalked and lied about"
- 7) "Be wary of the porn professors who have ties to the porn industry and are under scrutiny for lack of ethics and harassment" [links to webpage about Prause]
- 8) "Ms. Prause is under investigation for making mean, demeaning, or cruel comments about fellow colleagues"
- 9) "You do not give fair play to the explosion of information, research and awareness about the dark side of human sexuality, sexual addiction, and instead regularly features articles whose primary points are backed by a PhD with discredited research who has been publicly outted for harassment and cyberstalking several key leaders in the sexual recovery movement – Nicole Prause"

I had to hire an attorney to try to get you to stop these defamatory statements. You received a Cease and Desist letter from Wayne Giampetro, JD, October 10, 2019 such that you were aware all of your statements about me were false. From that letter, you knew it was false that:

- 1) Prause falsified or used bogus data in her studies
- 2) Prause was trained at the Kinsey Institute to molest children
- 3) Prause is involved in the pornography industry
- 4) Prause has been, or is currently, funded or receiving material support from pornography organizations

- 5) Prause is "unprofessional and unethical"
- 6) Prause engaged in "stalking" or "cyberstalking"
- 7) Prause made false reports regarding the behavior of licensed professionals

You acknowledged receipt of this cease and desist letter. A copy is attached for your reference. Further, you acknowledged viewing a public Twitter post by me on December 17, 2019, which posted a letter from PornHub verifying that your statements about my supposed connections to PornHub were false. Rather than use this opportunity to rescind your defamation, you posted yet more malicious defamation:

"Anyone who seeks to support their cause with evidence from PornHub just loses more credibility. PornHub - really? We trust PornHub now? I don't think so."

It has become clear that your false statements have caused significant damage, totaling well over \$10,000 in fees, lost work time, documentation, and notifications. This will be your only chance to settle this matter before I file suit against you in Small Claims Court. Should you attempt to defend your malicious defamation, you will be forced to do so in California, at your expense, where all defamed parties (Prause, California Board of Psychology, and PornHub) are located in addition to the cost of my award.

I am agreeable to a lump sum payment, or to a payment plan. Please contact me on or before 10 business days from the date of this letter for purposes of settling this matter. If I do not hear from you on or before 10 business days from the date of this letter, I will file a lawsuit against you without further notice. It is in your best interest to settle this matter before a lawsuit is filed. If a judgment is obtained against you, it will negatively affect your ability to get credit, you will be ordered to pay court costs, and you will incur interest at a rate of 10% per annum.

Based on the foregoing, I expect payment in the amount of \$10,000.00 made payable to me, P.O. Box 1318, Sacramento CA, 95812 no later than 10 business days from the date of this letter. If you decide to ignore this demand for payment, I will further pursue all of its legal remedies without further notice to you. This letter is evidence that I have attempted to resolve this matter informally.

Sincerely,

Nicole Prause #2823

She also sent a copy of this demand letter to the entire board of yet another professional organization I belong to – the Society for the Advancement of Sexual Health. She also sent them a "cease and desist" letter about me (and several others), because this organization had awarded me the "Annual Media Award" last year, implying they should silence me somehow.

Ms. Prause's list of allegations are either untrue or not defamation. She often conflates general statements I have made with personal attacks against her, when I did not name her at all. Where is the evidence of this list of claims? Such allegations can be an attempt to humiliate.

MS. PRAUSE FILES IMPROPER SMALL CLAIMS SUIT AGAINST ME IN CALIFORNIA - 2019

Three days after emailing me her demand for \$10,000, she filed a small claims suit in California, suing me for \$9999. Now I am legally forced to deal with this – a small claims suit in a city I do not live in, work in, nor own property in – for her baseless claims. I believe once again she is trying to use systems with nuisance false complaints to harass others she seeks to silence.

Case information: <http://www.lacourt.org/casesummary2/ui/casesummary.aspx?#ROA>

The trial is scheduled for 2/13/2020 – I am requesting it be dismissed.

HER CONTINUED DEFAMATION – NOW PERPETRATED FROM A WHOLE GROUP OF “EXPERTS” - 2019

After reading her detailed false allegations and contemplating all the attacks that have continued to me personally since 2017, I considered filing a legal restraining order against Ms. Prause for her false claims, and I've consulted with multiple attorneys. However, I feel I need to maintain the clear right speak publicly to defend myself against her ongoing lies. I find myself feeling anxious and vigilant for the next online attack.

For example, an organization where Ms. Prause serves on the “experts” panel just recently posted this defamation about me on social media – *after she'd filed in small claims court against me for making false statements against her!* This statement said “my group” (what group?) recently sued them (I have not sued this organization) and lost (I have not lost a suit with any organization). This group, called “Real Your Brain on Porn,” also said I advertise myself as in recovery from bipolar disorder (I do not, and have never been given that diagnosis).



In summary, dealing with all these attacks and lies has been stress-filled, time-consuming, distressing and exhausting. It has taking away my time from work, relationships, family, and other positive activities. I thank you for your consideration of my testimony about this situation.

Sincerely,

Staci Sprout

Further Affiant sayeth not.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 21 January, 2020.

Staci Sprout
Staci Sprout



Real Your Brain on Porn
@BrainOnPorn

Replying to @heeretocorrect @Stacisprout and @mike_salter

Her group sued us and lost:

wipo.int/amc/en/domains...

As you note, we have zero connection here, but Sprout has continuously promoted bizarre conspiracy theories. She advertises herself as in recovery from bipolar disorder and numerous "addictions", so we hope she gets treatment.

9:24 AM · Dec 30, 2019 · Twitter Web App

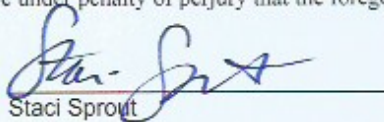
In summary, dealing with all these attacks and lies has been stress-filled, time-consuming, distressing and exhausting. It has taking away my time from work, relationships, family, and other positive activities. I thank you for your consideration of my testimony about this situation.

Sincerely,

Staci Sprout

Further Affiant sayeth not.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 21 January, 2020.


Staci Sprout