Exhibit 11

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

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

DECLARATION OF GARY WILSON

My name is Gary Wilson. 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 the author of a book entitled *Your Brain On Porn: Internet Pornography and the Emerging Science of Addiction*. Since 2010, I have also hosted a large informational website (12,000+ pages) featuring relevant research on pornography's effects among other items of interest: www.yourbrainonporn.com.

One apparent result of running this website, cataloging new research, and posting critiques of questionable research, is that for nearly seven years, I have been the target of disturbing attacks by Dr. Nicole Prause, her colleagues and their press sympathizers. It is difficult to put into words, and nearly impossible to catalog, the degree of harassment, fabrication and cyberstalking to which I have been subjected. Incidents include multiple false claims that I have committed crimes. Some years ago, I was forced to begin documenting her behavior as a way to cast sunshine on her activities.

The incidents are too numerous to list in an affidavit, even with extensive exhibits. A limited sample appears below, taken from the obscure pages on my website where I catalog her ongoing harassment of others and myself.

- 1. Dr. Prause has sent me the following series of spurious, threatening cease and desist letters warning me to stop doing things that I have not done:
 - a. October 15, 2015
 - b. May 5, 2019

- c. July 3, 2019
- d. August 27, 2019
- e. October 10, 2019
- f. November 19, 2019

Typically, she then posts her letters online, and links to them as if they establish my wrongdoing. In a striking invasion of my privacy, she had a copy of the July 3, 2019 letter (addressed to my attorneys) hand delivered to my home at around 10pm. A true and accurate copy of that letter is attached and incorporated as Exhibit "A".

- 2. Dr. Prause has been part of an extensive smear campaign endeavoring to paint me and others in the porn-recovery movement as fascists and white supremacists. This campaign ramped up to new heights concurrently with the Pittsburgh synagogue shootings in October, 2018. With Dr. Prause's admitted collaboration, her close colleague David Ley published a defamatory Psychology Today article targeting me (yourbrainonporn.com), Gabe Deem (RebootNation) and Alexander Rhodes (Nofap): "Why Fascists Hate Masturbation: The rise of nationalism coincides with anti-masturbation movements." It appears from another article, a true and accurate copy of which is attached and incorporated as part of Exhibit "B," that Ley is being paid by StripChat, a subsidiary of xHamster (a porn giant). Then, in August, 2019, in the wake of two mass shootings (El Paso and Dayton) Dr. Prause posted tweets and screenshots trying to connect me, my website and Nofap to Nazis and white nationalists. Dr. Prause and her colleagues have also tried to paint me in a false light as being in sympathy with white supremacists because I once appeared on a podcast to discuss internet-porn related problems – not race politics – with a man named Stephen Molyneux. (Molyneux has been a guest on various mainstream programs, but was eventually found to have made some statements with which I and many others strongly disagree.) To this day, Dr. Prause collaborates with various allies to promote and amplify her smear campaign. True and accurate examples of screenshots of tweets by Dr. Prause and her apparent alias @BrainOnPorn are attached and incorporated as part of Exhibit "B".
- 3. I have known of Alexander Rhodes for more than seven years. I regularly monitor a variety of recovery websites, including his, to collect and compile recovery self-reports. I have never witnessed Rhodes threatening or stalking Dr. Prause, or encouraging anyone else to threaten, stalk or rape Dr. Prause.
- 4. I have never witnessed Rhodes encouraging hate groups of any kind. Rather, I have witnessed him doing everything in his power to keep members of such groups off of his platforms.
- 5. I have seen Dr. Prause repeatedly, publicly disparage not only Nofap, but also Rhodes individually. On multiple occasions, she has publicly claimed that she has reported Rhodes to the FBI for misconduct. She has publicly described Rhodes as a physical stalker and cyberstalker, as a misogynist, as a serial harasser, as the subject of a no-contact/restraining order, as a promoter of "Proud Boys," and as a promoter of rape and violence against women. Following Rhodes's filing of his defamation lawsuit, Dr. Prause tweeted that she had contacted the FBI concerning Rhodes. In one tweet Prause stated "The FBI has asked me to make clear that the donations going to Alexander Rhodes of NoFap are fraud"

- (11/12/19). In a second tweet Prause stated that Rhodes would soon be charged with "criminal larceny" (11/14/19). Around this time, Dr. Prause's presumed Twitter alias (@BrainOnPorn) stated that "Rhodes sends violent trolls after female neuroscientist, then sues her for distress." True and accurate screenshots of tweets by Dr. Prause and her apparent alias @BrainOnPorn are attached and incorporated as part of Exhibit "C".
- 6. While publicly, repeatedly claiming I am wrongfully attempting to suppress her First Amendment rights, Dr. Prause has made multiple attempts to censor my website, including at least two serious attempts to have it taken down entirely. She apparently objects to my site factually documenting some of her extensive malicious activity. Her censorship attempts that I know about include (details below list):
 - a. Multiple groundless DMCA takedown requests to have images of her many tweets removed from my site.
 - b. An attempt to trademark my website's long-established URL (www.yourbrainonporn.com), as well as an attempt to trademark the name of my website and book ("Your Brain On Porn").
 - c. A letter threatening to sue my webhost Linode unless it removed my website.

a. DMCA demands

True and accurate copies of Dr. Prause's failed DMCA demands relating to pages on my website that contain screenshots of tweets by her and @ BrainOnPorn (her apparent alias) are attached and incorporated as Exhibit "D".

b. Trademark application to gain control of my site, and infringement

In January, Prause attempted 2019 Dr. to trademark (http://tsdr.uspto.gov/#caseNumber=88281342&caseType=SERIAL NO&searchType=st atusSearch) my website's long established URL ("yourbrainonporn.com") as well as the title of my book (and website), in order to gain control of my website. In addition to her trademark application, in mid-April, 2019 her close colleague Daniel Burgess (or perhaps Dr. Prause herself) set up an "impostor" website (which is believed to be managed by Dr. Prause). It was first called www.sciencearousal.com. Swiftly, however, it changed its name to www.realyourbrainonporn.com, a name that infringes on my trademarks, and which is designed to divert traffic from my website. The site proclaims itself to be the "real" (or genuine) Your Brain On Porn. Among other efforts to confuse visitors, the browser tabs for the new site feature the exact name of my website (not the new site's name). Moreover, the press release about the impostor site claims to be from Ashland, OR where I live (and Burgess and Prause do not). Burgess was ultimately revealed as the nominal owner of the trademark-infringing URL www.realyourbrainonporn.com. However, Dr. Prause's lawyer Wayne Giampietro Esq. represents both Burgess and herself. My attorneys sent Dr. Prause a Cease and Desist letter, and months later she dropped her trademark application. However, the infringing website has not changed its name as requested. True and accurate screenshots of Dr. Prause's trademark application and a copy of my attorneys' letter, and are attached and incorporated as Exhibits "E & F".

The infringing website's associated infringing Twitter account (@BrainOnPorn) also appears to be managed by Dr. Prause and, perhaps, her colleagues (presumably including

Burgess). It is confusingly similar to my account in terms of design, and its header says "Real Your Brain On Porn." Already people trying to link to my Twitter account have mistakenly tweeted it instead. It regularly tweets defamatory material in the same vein that Dr. Prause herself has tweeted and posted for years. True and accurate copies of a design comparison and evidence of consumer confusion are attached and incorporated as Exhibit "G".

c. Legal threat to my webhost

On November 19, 2019 Dr. Prause's attorney Wayne Giampietro wrote to my webhost threatening it with legal action unless it took down my website entirely (www.yourbrainonporn.com). His theory was that I had Prause's home address on my website (as part of the screenshot of the public trademark application she filed for my site's URL). Months after I placed an image of her trademark application on my site, she claimed her participation in the "Safe At Home" program made displaying her trademark application address a violation. In fact, the address in her application was not her home address. (I know because she could not be served at that address.) Long after she enrolled in the "Safe At Home" project, Prause herself still publicly displayed the application address as her LinkedIn address. Nevertheless, I have since redacted the address. A true and accurate copy of Wayne Giampietro's letter to my webhost is attached and incorporated as Exhibit "H".

- 7. In August, 2019, the Twitter account that appears to managed by Dr. Prause (@BrainOnPorn) commenced a smear campaign against me, claiming falsely that I had Mormon-themed pornography hundreds **URLs** of on (www.yourbrainonporn.com). This fraudulent claim was quickly exposed as a ruse, but @BrainOnPorn tweeted more than a hundred times over the course of 4 days insisting that I had a secret Mormon-porn fetish. The tweets were directed to various key public figures and professional organizations, attempting to smear my reputation as widely as possible. Among the Mormon-porn smear tweets were three false claims that I had committed actual crimes: That I physically stalk women; that I have made death threats; and that I engaged in criminal computer intrusion. The latter was in response to my tweet demonstrating precisely how anyone can insert false, nonexistent links into the internet archive site ("Wayback Machine") that @BrainOnPorn had linked to as "proof" of my supposed Mormon-porn fetish. A true and accurate copy of my attorneys' October 4, 2019 cease and desist letter (with tweets) is attached and incorporated as Exhibit "I".
- 8. The phony Mormon-porn smear campaign extended to emailing acquaintances of mine, implying that I am dangerous and claiming that my motivation for managing my Your Brain On Porn brand and speaking about the risks of internet porn consumption was to gain access to young Mormon women. (From the email: "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." (Note: there was never any "[Mormon-porn] text" on my website.) As a man who has been happily married for almost 20 years, this smear is particularly offensive. A true and accurate copy of one such email is attached and incorporated as Exhibit "J". Note that the email was sent from the

- URL ("sciencearousal.com") that was used, apparently by Dr. Prause, before the infringing URL "Realyourbrainonporn.com" took its place.
- 9. In November, 2019, the Twitter account (@BrainOnPorn) tweeted the personal LinkedIn page of the mother of my son. @BrainOnPorn later deleted the tweet, but I interpreted it as a threat that Dr. Prause (who appears to manage @BrainOnPorn) and her colleagues might involve my son or my ex in their ongoing harassment. A true and accurate copy of such tweet is attached and incorporated as Exhibit "K".
- 10. On December 16, 2019, Dr. Prause pinned a tweet to her personal Twitter account (@NicoleRPrause), publishing two of the pleadings she had filed earlier in connection with her failed Motion to Dismiss in the defamation lawsuit *Hilton v. Prause*. (She had made these items available to a website called www.reason.com, and linked to them there without mentioning that her Motion to Dismiss had been denied.) One of these items is an astonishing 86-page affidavit. In it, she and two of her colleagues attack many people. However, I seem to be its prime target. It mentions my name some 220 times, defaming me repeatedly. (I am not a party to *Hilton v. Prause*, but I filed an affidavit at the request of plaintiff Dr. Hilton.) Among other untrue and misleading claims about me, Dr. Prause falsely accuses me of several crimes, including that Alexander Rhodes and I engage in the criminal acts of stalking women in person, "white supremacist death threats," and computer intrusion (which she claims to have reported to the FBI). She disseminated her misleading document widely and publicly, not only through the Reason.com article, but also via YouTube and numerous Twitter posts. True and accurate copies of relevant tweets are attached and incorporated as Exhibit "L"., as is a link to my rebuttal.
- 11. In April, 2018 Dr. Prause filed a false police report about me with the Los Angeles Police Department (LAPD) wherein, among other untrue allegations, she claimed that I appeared near her home in a sleeping bag, armed with a long-sleeved sweater. I cannot recall having been in Los Angeles since I first heard of Dr. Prause. I have never stalked anyone. To my knowledge, no police investigation of me has ever been conducted by LAPD or any other law enforcement agency. I first learned of her false report almost a year later in March, 2019 when Dr. Prause persuaded student editors Karley Betzler and Samantha Stroozas at University of Wisconsin Lacrosse to publish her false report online ("The Racquet Investigates: Fight the New Drug") and mischaracterize its contents. University authorities eventually removed it after I objected. I am informed by the LAPD that reports such as the one published are not public documents, and that only the person who files the complaint can obtain a copy. A true and accurate copy of an excerpt from the newspaper article where the false police report was published and Dr. Prause's full police report, are attached and incorporated as Exhibit "M".
- 12. In the spring of 2018, someone filed a malicious report with the Oregon Board of Psychology claiming that I was practicing psychology without a license. I found out about it in July, 2018 when I received a letter from the Board exonerating me, a true and accurate copy of which is attached and incorporated as Exhibit "N," explaining that they could not reveal who had filed it. I know of no person other than Dr. Prause who would make such a

- false accusation. I have documented multiple baseless, malicious reports Dr. Prause has filed against others.
- 13. In March, 2018, Dr. Prause began publicizing an unfounded rumor that I had been fired from the position I last held as Adjunct Instructor at Southern Oregon University. True and accurate copies of a sampling of the documents authored by, or containing statements by, Dr. Prause wherein she claimed that I had been fired are attached and incorporated as part of Exhibit "O". Dr. Prause also falsely stated in an article on Mikesouth.com (reproduced truly and accurately and attached and incorporated as part of Exhibit "O") that my book proceeds directly profit me, when in fact they go to a registered educational charity. I am affiliated with the charity, but not employed by it. Nor do I serve on its board. The accusations are untrue. I was not fired, but had voluntarily ended my employment because of an acute physical illness. I had to obtain an un-redacted copy of my records and make them public in an attempt to counter the false, public statements made by Dr. Prause. I confirmed with the University's general counsel that Dr. Prause is the only person (apart from myself) who has ever requested my employment records. True and accurate copies of these related documents are attached and incorporated as part of Exhibit "O".
- 14. On March 3rd 2018, Dr. Prause posted a defamatory article on Quora.com containing the redacted copies of my employment records falsely stating that Southern Oregon University had fired me. Over the next two days Dr. Prause posted ten more demeaning and untruthful comments about me and my employment, all containing a link to her defamatory Quora article. I reported Dr. Prause to Quora for violation of terms of service and harassment. Quora permanently banned Dr. Prause. True and accurate copies of Prause's Quora article and evidence of Dr. Prause's banned account, are attached and incorporated as Exhibit "P".
- 15. Dr. Prause apparently defamed me to the organizers of the 2018 European Society for Sexual Medicine/International Society for Sexual Medicine conference, causing the ESSM to cancel my keynote address. On January 24, 2018, 12 days after my ESSM keynote address was canceled (no details about which were given to me or made public), Dr. Prause tweeted in a thread about "gw" (Gary Wilson) that I "just got removed for an actual good reason from a conference," that I am "losing [my] sh*t," and that "assuming some mental struggles seems very reasonable." She supplied no evidence for any of her insults. On March 11, 2018, she falsely accused me of "trying to sneak in science conferences using fake credentials." On Feb. 16, 2019, Dr. Prause tweeted that "a talk" at the ESSM 2019 "was removed for fraud" and giving "false credentials." Immediately below, she tweeted a picture of me, and misrepresented a paper that I co-authored with 7 US Navy physicians. I engaged in no fraud, and I made my credentials perfectly clear to the organizers who initially invited me. True and accurate copies of Prause's social media posts, and ESSM emails are attached and incorporated as Exhibit "Q".
- 16. For years, Dr. Prause has repeatedly stated on social media that she has reported me to a range of authorities for "physically stalking" her.

- a. For example, she claims to have reported me multiple times to the FBI. True and accurate copies of sample statements, my FOIA request to the FBI, and the FBI's letter confirming that no such reports existed, are attached and incorporated as part of Exhibit "R".
- b. In October, 2016 Dr. Prause placed a PDF on AmazonAWS with screenshots of emails involving Washington University PD Patrolman Tim Dennis (St. Louis) warning him falsely that I intended to stalk Dr. Prause at the St. Louis AASECT conference. I have neither expressed nor harbored an intention to attend any presentation by Dr. Prause. A true and accurate copy of the PDF is attached and incorporated as part of Exhibit "S".
- c. For several years Dr. Prause used numerous aliases, social media accounts, and ultimately her own email accounts and an Amazon website, to falsely claim that she had reported me to the LADP and UCLA PD for stalking. After more than 6 years of these online claims, I have never been contacted by any police department or agency. True and accurate copies of some of Dr. Prause's statements are attached and incorporated as part of Exhibit "T".

Note: I have never attended, threatened, or desired to attend any gathering where Dr. Prause was present. Nor, to my knowledge, have I visited any city where she was present. I have certainly never stalked her.

- 17. In 2015 and 2016, Dr. Prause misused confidential information she obtained while reviewing a scholarly article I co-authored with 7 US Navy physicians ("Is Internet Pornography Causing Sexual Dysfunctions? A Review with Clinical Reports"). She did so in violation of ethics rules. In 2015, she used a false identity (Janey Wilson) and the confidential information to contact the management of the organization that serves as the domicile for the registered charity to which I donate the proceeds of my book, and made false statements about me to the organization where it is domiciled. A true and accurate copy of the false statements she made is attached and incorporated as part of Exhibit "U". Dr. Prause also reported the charity to the Scottish Charity Regulator, falsely claiming financial fraud involving the charity personnel and myself. A true and accurate copy of the false statements she made about the charity is attached and incorporated as part of Exhibit "V".
- 18. I donate the proceeds of my book *Your Brain On Porn: Internet Pornography and the Emerging Science of Addiction* to The Reward Foundation, a registered Scottish charity. It is defamatory to state that I do not. In emails, on Wikipedia and in the public comment section of the World Health Organization's ICD-11 forum, Dr. Prause falsely claimed that I received over 9,000 pounds from the above charity. A true and accurate copy of the false statements she made about such payments is attached and incorporated as Exhibit "W".
- 19. Over the past 6+ years, Dr. Prause has employed multiple (perhaps dozens of) aliases in violation of Wikipedia rules against sockpuppets (aliases), in order to edit several different Wikipedia pages inserting false and defamatory material about me. This is particularly

damaging as Google presumes information on Wikipedia is reliable, even though it is nearly impossible to correct misinformation on Wikipedia relating to the subject of pornography. Wikipedia itself finally took action against Dr. Prause, citing multiple illicit accounts created by one of her aliases. A true and accurate copy of Wikipedia's disciplinary action blocking her "NeuroSex" account and some of her related aliases is attached and incorporated as Exhibit "X".

20. In addition to the incidents/campaigns described above, Dr. Prause consistently, publicly repeats that I have employed misogynistic language to denigrate her. This statement appears on various social media forums and in public documents. Like her other claims, this is untrue, and the supporting "evidence" does not hold up to close scrutiny. Exhibit "Y".

I declare under penalty of perjury that the f 2020.	Foregoing is true and correct. Executed on 22 January,
2020.	
Gary Wilson	-

damaging as Google presumes information on Wikipedia is reliable, even though it is nearly impossible to correct misinformation on Wikipedia relating to the subject of pornography. Wikipedia itself finally took action against Dr. Prause, citing multiple illicit accounts created by one of her aliases. A true and accurate copy of Wikipedia's disciplinary action blocking her "NeuroSex" account and some of her related aliases is attached and incorporated as Exhibit "X".

20. In addition to the incidents/campaigns described above, Dr. Prause consistently, publicly repeats that I have employed misogynistic language to denigrate her. This statement appears on various social media forums and in public documents. Like her other claims, this is untrue, and the supporting "evidence" does not hold up to close scrutiny. Exhibit "Y".

I declare under penalty of perjury that the foregoing is true and correct. Executed on 22 January, 2020.

Gary Wilson

Lawrence A. Poltrock Jennifer K. Poltrock Wayne B. Giampietro

POLTROCK & GIAMPIETRO Attorneys and Counselors 123 W. MADISON STREET, SUITE 1300 CHICAGO, IL 60602

Kurtis R. Hale

(312) 236-0606; FAX (312) 236-9264 wgiampietro@giampietrolaw.com

July 3, 2019

VIA EMAIL: Asimmons@fitcheven.com

Ms. Alisa C. Simmons Fitch, Even, Tabin & Flannery LLP 120 S. La Salle Street, Suite 2100 Chicago, IL 60603

> Re: Gary Wilson; Your Brain On Porn; Dr. Nicole Prause; Real Your Brain on Porn

Dear Ms. Simmons:

As you know, we are counsel to Dr. Nicole Prause. On May 9, 2019, I wrote to you informing you that your client, Gary Wilson has engaged in a constant barrage of untrue, defamatory attacks upon Dr. Prause. Although I demanded that you inform Mr. Wilson that he would be well advised to cease his false publications and allegations against Dr. Prause, his attacks continue unabated. Mr. Wilson made eight new posts attacking and defaming Dr. Prause yesterday alone.

Mr. Wilson does not appear to realize that every additional false statement and attack he makes against Dr. Prause will increase the damages which will be assessed against him. It is now obvious that not only is Dr. Prause entitled to recover actual damages which have been caused by these attacks, but that Mr. Wilson's malice will entitle her to obtain punitive damages in a large amount. The news media is replete with examples of the kind of punitive damages juries are awarding for the kind of conduct in which Mr. Wilson is engaging.

Dr. Prause has reached the end of her patience with Mr. Wilson. This is to inform you and your client, Gary Wilson, that unless he immediately ceases and desists from his defamatory campaign against Dr. Prause we will file suit against him for defamation, intentional interference with business relations, false light invasion of privacy, and undoubtedly several other causes of action.

The next communication Gary Wilson will receive from Dr. Prause will be a Summons and Complaint. Please counsel your client to cease his unlawful behavior.

Wayne B. Giampietro

WBG/afd cc: N. Prause

Exhibit B

Stripchat To Hold Live Cam Therapy Sessions Featuring Sex Doctors

Starting August 1, members of the Sexual Health Alliance will appear on live cam to discuss issues like addiction, infidelity, and relationship conflicts with cam users July 30, 2019 8:33 AM Tech - By Robert Neuwave



CYPRUS—Leading camsite Stripchat, in partnership with the Sexual Health Alliance, will be bringing clinical psychologists, sex researchers and relationship therapists onto its global cam platform to answer viewers' questions (whether they're subscribers or not) about sex addiction and online infidelity. The initiative will kick off Thursday, August 1, with an hour-long cam session with Dr. David Ley.

"Cam users are passionate about cams, but the outside world doesn't always accept that," stated Max Bennet, Vice President of New Media at Stripchat. "Cam fans are more likely than other adult fans to struggle with shame and anxiety about their desires. This is a chance for them to get past some of the myths and stigma around porn, and talk to an expert about what science actually says."

A recent study by Stripchat showed that:

* 42% of all cam users have experienced anxiety about their cam habits, with 11% reporting frequent or constant anxiety.

- * 31% of married cam users said cam watching had caused conflicts in their relationship.
- * 24% of married cam users said they had fallen in love with a cam performer
- * Women and the very religious were the most likely to spend excessively on cams—over \$1K a month—and to feel shame about it

As part of the campaign, Stripchat solicited questions from its users that they would like a doctor to answer. The questions ranged from fears about sex addiction to worries about mental health.

Stripchat has partnered with the Sexual Health Alliance to help cam users better understand the science behind cam and porn use. SHA Advisory Board member Dr. David Ley will appear on cam on August 1 to discuss the latest research on the origins of sexual shame, online infidelity and sex addiction.

"Webcam users have been left out of most research and therapy," said Dr. Ley. "Non-shaming support and education is nonexistent. This needs to change, and this is how it starts."

"Sex Addiction: Myths and Facts" will take place on Stripchat on Thursday, August 1, 2019 at 5 PM ET/2 PM PT.

Users must be logged in in order to ask questions; however, no membership to Stripchat is needed to view the session. Survey data and other information about the initiative are available.

Why Fascists Hate Masturbation

The rise of nationalism coincides with anti-masturbation movements

David J. Ley Ph.D.

Posted Oct 27, 2018 https://www.psychologytoday.com/us/blog/women-who-stray/201810/is-one-sexual-behavior-triggering-certain-groups



In recent years, we've seen the return of a strange, antiquated belief system that claims that masturbation results in weakness, loss of manhood, and psychological damage. There's nothing really new about this belief – Swiss physician Samuel Tissot promoted the idea in 1760, arguing that semen was an essential oil, the loss of which resulted in decreased strength, memory, reason and morality. Benjamin Rush, a physician and signer of The Declaration of Independence treated masturbation with leaches, and claimed it caused blindness and mental disturbance. Graham and Kellog, 19th Century physicians invented bland foods like corn flakes and graham crackers to curb the desire to masturbate (I think that Graham didn't anticipate s'mores, which are actually pretty sexy). Kellog advocated a host of punitive, restrictive measures to prevent children from masturbating, and was an early advocate for circumcision, arguing that it would reduce male masturbation. Christian arguments against the sin of onanism are now understood as a misinterpretation of the story of Onan, which is truly a condemnation of selfishness and depriving a widow and children of inheritance, not actually a condemnation against masturbation. The DSM-I, published in the 1950's by the American Psychiatric Association offered the diagnostic code of 317.1 for the mental health disorder of masturbation. But, modern society seemed to have moved away from open condemnation of the dangers of self-pleasure. At least it did, for a few decades.

Just in the past couple of years, we've seen the explosive rise of numerous groups and figures also advocating against the dangers of masturbation:

- The Reddit nofap community is a large group of individuals, who use this online form to tout the health benefits of refraining from masturbating. Predominantly male, and largely young, white and often <u>religious</u> males, these discussion groups describe how masturbation, especially to porn, lessens men's focus, and interferes in the men being able to get dates or sex from real women.
- Your <u>Brain</u> on Porn and Reboot Nation are also online groups who argue that masturbation to <u>pornography</u> results in neurological changes which desensitize a person's brain to real sex, cause <u>erectile dysfunction</u>, and instill an <u>addiction</u> to Internet pornography. They promote the idea of a 90-day period of abstinence from sex and masturbation, in order to "reboot" the brain, like resetting it back to the original specs before you started watching porn (In case you were wondering this isn't actually how brains work we never go back, only forward in or neurological development).
- Numerous modern religious communities have condemned masturbation, especially to
 pornography. Brigham Young university, a Mormon school, spent what appears to be a
 great deal of money to produce a <u>public service advertisement</u> against the dangers and
 "darkness" of masturbation. For decades, Mormon deacons have conducted "<u>worthiness</u>
 <u>interviews</u>" of adolescents, centered on detecting and punishing masturbation, a practice
 now under scrutiny and attack.
- Texas Senator Ted Cruz has taken on the dangers of masturbation, <u>arguing</u> in 2007 that US citizens have "no substantive due process right to stimulate their own genitals."
- Conservative psychologist and Youtube sensation Jordan Peterson, PhD., has suggested "there's nothing noble about masturbating to pornography."
- The Proud Boys is a group of young, nationalist males, self-described "Western Chauvinists," who have recently been connected to numerous hate crimes, including public <u>assaults</u> on gay men. A central tenet of the Proud Boys' belief system is the value

of <u>#NoWanks</u>, claiming that masturbating makes men less likely to get dates and a way to push back against modern liberal culture. An interesting connection exists between NoFap and the Proud Boys – Alexander Rhodes, one of the leaders of the NoFap movement, <u>appeared</u> in 2016 on Gavin McInnes's show, discussing NoFap and #NoWank. McInnes is the founder of The Proud Boys. Interestingly, that show ended with a clip from porn star Mercedes Carrera (to whom, one might imagine, many men have masturbated). Recently, as The Proud Boys garnered significant negative attention, NoFap issued a <u>response</u> from their <u>Twitter</u> account, stating that "Proud Boys has nothing to do with NoFap. They are not affiliated with our organization in any way. NoFap is non-legislative and non-partisan."

David Duke, associated with the KKK and white supremacy, suggested that pornography was a Jewish conspiracy, intended to serve as a "weapon of revenge" against European (white) men and societies. Duke argues that masturbation in fiction and films is a "metaphor for Jewish behavior" and cites Breitbart, and alleged masturbation by "asylum seekers" as a way to argue against immigration. Duke implores his followers to watch a video by Gary Wilson, founder of Your Brain on Porn.

You may notice that, overwhelmingly, all of these concerns, both historical and modern, about masturbation are primarily focused on male masturbation. Rarely were these arguments concerned with female masturbation. Why? And why, with almost no exceptions, are the leaders of these movements all conservative, religious white men? Conservative media outlet Breitbart sneers at liberals who "boast of masturbating," apparently because they'd grown "bored of LGBTQI."

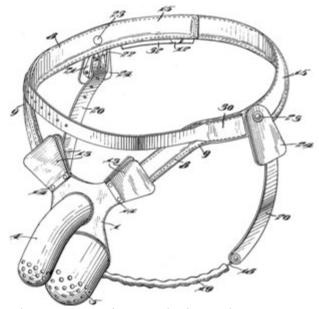


Source: Pixabay

Wilhelm Reich was an early 20th Century psychoanalyst who wrote <u>The Mass Psychology of Fascism</u> analyzing and criticizing the Nazi Party of 1930's Germany. Reich's book was so controversial that he was kicked out of the Communist Party that he had joined, due to concerns about angering the growing German power. Reich suggested that sexual suppression was a tool of fascism, a way to train young people to submit to authority, even in something relating to their own body. (Note, Reich went on to have some kooky beliefs of his own, about, for instance, the mystical power of the <u>orgasm</u>.)

Suppression of the natural <u>sexuality</u> in the child, particularly of its genital sexuality, makes the child apprehensive, <u>shy</u>, obedient, afraid of authority, good and adjusted in the authoritarian sense; it paralyzes the rebellious forces because any rebellion is laden with anxiety; it produces, by inhibiting sexual curiosity and sexual thinking in the child, a general inhibition of thinking and of critical faculties. In brief, the goal of sexual suppression is that of producing an individual who is adjusted to the authoritarian order and who will submit to it in spite of all misery and degradation. At first the child has to submit to the structure of the authoritarian miniature state, the family; this makes it capable of later subordination to the general authoritarian system. The formation of the authoritarian structure takes place through the anchoring of sexual inhibition and anxiety. Wilhelm Reich.

Religions, and particularly the conservative religions which form the backbone of modern conservatism, have a long history of condemnation of masturbation. Masturbation feels good, and is a private source of erotic pleasure which leads one to be more comfortable with one's own body, and with sexuality in general. Our bodies, and sex in particular, are associated with "the mortal plain," leading us to focus on or sensations and physical existence. But religions, and conservative politics, want us to focus on other things, aspiring to some higher "nobility" as Peterson suggests.



19th Century Anti-Masturbation Belt

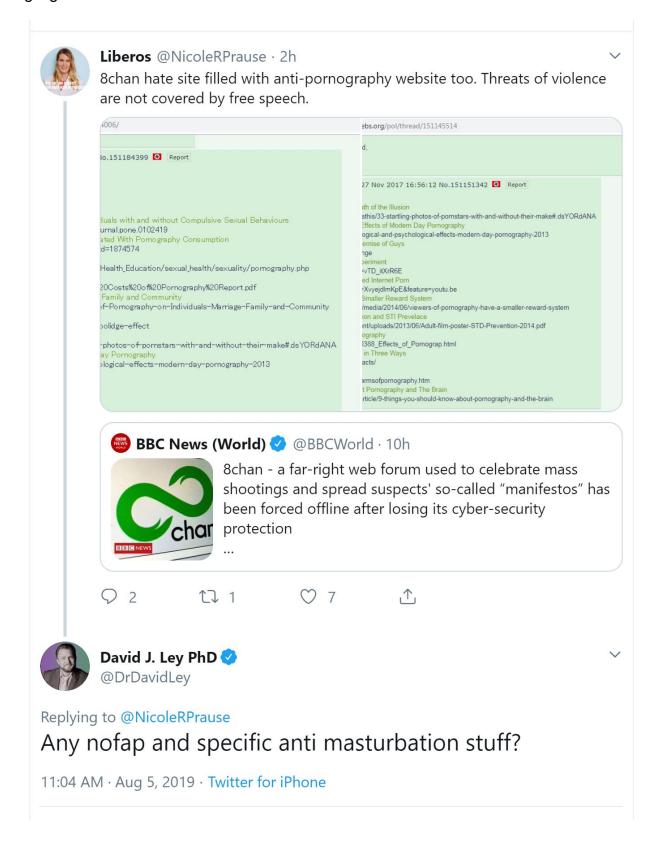
Masturbation is the healthiest human sexual behavior, associated with a range of health and life benefits, with no known (to science or medicine) health risks. It is <u>pregnancy</u> and disease free. It teaches people to accept and understand their own sexuality. Healthy sexual and marital relationships are improved by masturbation, when the <u>shame</u> and stigma of it are removed.

It would be easy, but likely foolish, to spin a theory that all of these modern anti-masturbation movements reflect secret Machiavellian plans to infiltrate the minds of young men and make them susceptible to authoritarian influence. Hanlon's Razor suggests that it is a waste of time to

attribute to conspiracy, what can be adequately explained by mere stupidity. The hatred of masturbation by these various conservative men may also reflect <u>fear</u>, as opposed to stupidity. Most of them seem to have religious backgrounds, and likely grew up being taught to suppress their desires for anything other than heterosexual monogamy. The modern world, the "liberal world" as the Proud Boys decry it, offers many varied sexual experiences, apart from a heterosexual <u>marriage</u>. Perhaps that diversity of opportunities, and their own fear of their ability to resist them alone, drives these campaigns for communal resistance against masturbation?



Tweeted is response to two mass shootings (El Paso and Dayton). My name is highlighted is screenshots.





Replying to @SexualSocialist

We assume this is why I am getting white nationalist death threats. A darling of white nationalists, fanning their flames shamelessly, & posting libel daily to direct them to us. This is a well-known conspiracy theory among that group:

nytimes.com/2019/06/07/us/ ...

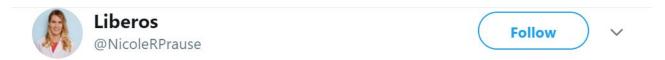
Jewish Subversion

Nicole you are a terrible human being and a filthy whore for money. You don't care how many people porn harms or how many kids grow up watching it and get addicted. No one is that stupid, we all know the truth. But you don't care what goys you hurt as long as you get some sick Jewish revenge on them. The day of the rope is coming for you and your group of cosmopolitans.

1:17 PM - 14 Jun 2019

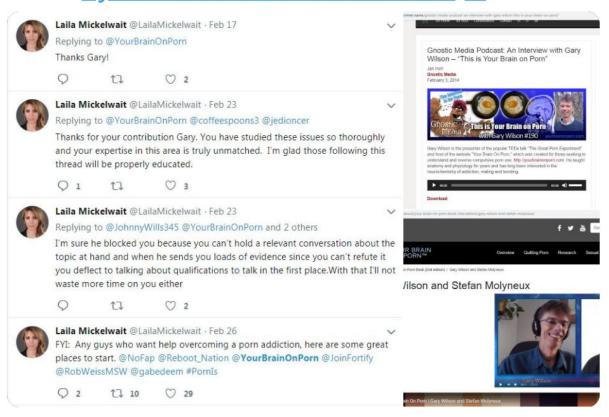
1 Like





Replying to @princessjack

Their only "scientist" isn't a scientist, but is a regular on white-supremacist shows. We get death threats from these people, so filled with hate. nytimes.com/2019/06/07/us/...



9:14 AM - 17 Jun 2019



Replying to @BrainOnPorn @lblwcri and 2 others

Wilson has been on multiple white supremacist podcasts. Criminal, antisemitic death threats were then sent to Ley, Kline, Prause, Oeming, and others, all targeted publicly by Wilson, reported to police and are under active investigation.





Some get caught with #MormonPorn, and we get antisemitic death threats after the same Wilson appears on a bunch of white supremacist shows. @SASH1234 your move.

Madita Oeming @MsOeming · 9h

I know, I shouldn't be surprised, but the level of outright antisemitism in response to my #pornstudies class (!?) blows my mind! these are just a few screen shots of many more & it's scary AF to see this kind of ignorance spelled out so shamelessly... #FCKNZS

30s.

The porn industry is owned by jews.

Degeneracy for the goyim.

It's like the Weimar Republic all over again!

And the solution is the same. This time it needs to be final.

Are you jewish?

And I bet you're jewish too. Yeah she is Gotta be.

This is the most jewish thing ive ever seen

done to it, just like they did it in the

this is what I want

And our Addy is no where in sight to save us.

Germany needs a new Hitler

i demand to know your ethnicity

4:27 PM · Aug 23, 2019 · Twitter Web App

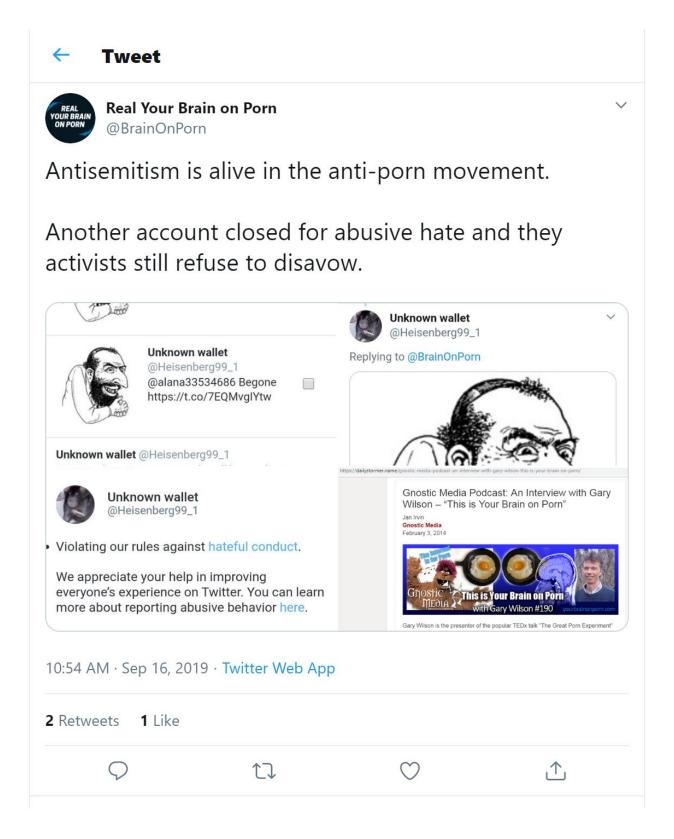
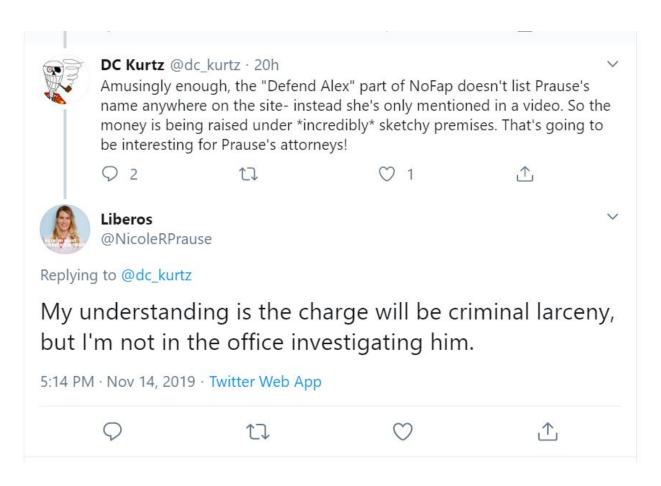


Exhibit C





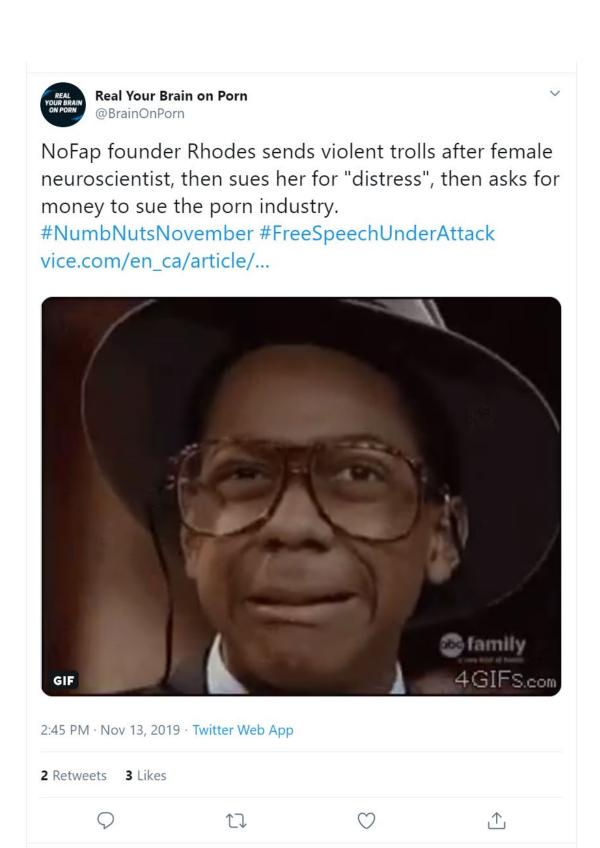


Exhibit D

Failed DMCA takedown demands relating to pages on my website that contain screenshots of tweets by Prause and @BrainOnPorn

Nicole Prause's First DMCA Attempt (3/28/18)

Your signature (assuming you're the copyright holder or you're authorized to act for the holder) This provides my digital signature.

Identification of the work that is infringed (or a representative list of such works), e.g., titles of your stories and URLs where they may be found;

Images of my likeness posted throughout www.yourbrainonporn.com

Identification of material that is infringing and which you wish to have taken down or blocked and enough information to allow the OSP to locate the material, e.g., an URL to the offending page; URL: www.yourbrainonporn.com containing 3,040 references to me. Examples are attached and include pages like:

https://yourbrainonporn.com/nicole-prauses-pdf-her-span-lab-website

https://www.yourbrainonporn.com/neuroscience-internet-pornography-addiction-review-and-update-excerpt-critiquing-prause-et-al-2015

https://yourbrainonporn.com/questionable-studies

 $\frac{https://www.yourbrainonporn.com/our-response-rory-reids-critique-nicole-prause-study}{https://www.yourbrainonporn.com/critique-letter-editor-%E2%80%9Cprause-et-al-2015-latest-falsification-addiction-predictions%E2%80%9D}{etc.}$

Ways for the OSP to contact you, such as an address, phone number, and an email (best to include all three);

Email: nicole.prause@gmail.com

Because this individual is stalking me, I prefer not to provide methods for him to escalate his stalking, such as a physical address or phone number. I do not have these posted anywhere online either, only fake addresses are given.

I believe that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law. The images are owned by photographer Neal Preston, from whom I have permission to file on his behalf. The information in the notification is accurate, and under penalty of perjury, that the complaining party is authorized to act on behalf of the owner of an exclusive right that is infringed.

Nicole Prause, Ph.D.

Liberos LLC: www.liberoscenter.com.

Gary Wilson's reply to Dr. Prause's first DMCA attempt (3/28/18)

Dear Linode,

Dr. Prause claims that "Images of my likeness posted throughout www.yourbrainonporn.com." This is untrue. The only image of Prause was at this url - https://www.yourbrainonporn.com/libelous-claim-gary-wilson-was-fired (now removed).

It appeared in a screenshot of an article Prause herself posted on an adult video blog, which contained libelous statements about me. (She posted, and mischaracterized, an employment document of mine, falsely claiming I had been fired. This document was subsequently removed via my DMCA takedown request.) I have now removed the image of Prause from that page, but it is Prause who made it public to harass and libel me. None of the other urls given by Prause contain images of Prause or images that she owns.

It's disturbing that Prause claims to be a victim here, as I have documented multiple instances of her harassing myself and others - including researchers, medical doctors, therapists, psychologists, former UCLA colleagues, a UK charity, men in recovery, a TIME magazine editor, several professors, IITAP, SASH, Fight The New Drug, the academic journal Behavioral Sciences, and the head of the academic journal CUREUS: https://www.yourbrainonporn.com/nicole-prauses-pdf-her-span-lab-website

No one appears to be stalking Prause. It is she who stalks and harasses others. Most of my site's references to Prause are on the above page that chronicles 5 years of Prause harassing and libeling me and others.

As for other places where Prause name appears, YBOP contains about 10,000 pages, and it's a clearinghouse for nearly everything associated with Internet porn use and its effects on the user. Nicole Prause has published multiple studies about porn use and hypersexuality, and by her own admission, is a professional "debunker" of porn addiction and porn-induced sexual problems.

A Google search for "Nicole Prause" + pornography returns about 9,000 pages. She's quoted in hundreds of journalistic articles about porn use and porn addiction, in addition to her research related to pornography use. She's on TV, radio, podcasts, and YouTube channels claiming to have debunked porn addiction with a single (heavily criticized) study. So Prause's name is inevitable on a site like mine, which functions as a clearinghouse for research and news associated with Internet porn's effects. YBOP also critiques Prause's studies other questionable research on porn and related subjects. These critiques are not personal, but rather substantive.

This DMCA take-down request is just the latest in a long string of harassment incidents by Prause. Dr. Prause has tweeted about me nearly 100 times, while I never tweet about her (other than correcting a few of her lies). Prause has used dozens of fake usernames to post comments about me on porn recovery forums (https://www.yourbrainonporn.com/nicole-prauses-pdf-her-span-lab-website#ybr) Prause has created an amazon AWS page to libel and harass me and many others (https://s3-us-

west1.amazonaws.com/weilerdefamation/PressRelease DefamationBySenatorWeiler.txt)

Thank you for your attention.

Gary Wilson

Nicole Prause's Second DMCA Attempt (4/17/18)

RE: COPYRIGHT INFRINGEMENT COMPLAINT Contact Information: **DMCA** Defender 1100 Walnut Street Kansas City, MO 64106 888-341-5554

Department and / or Legal Support,

We are writing on behalf of our client. Note that this communication is in reference to a serious legal issue. You are the owner or hosting company for the following website and that site is violating the copyrights of our client. Our client is the copyright owner of the images being infringed:

PLEASE REMOVE ALL IMAGES, VIDEOS, AND THUMBNAILS TO VIDEOS

Holding EEG by Nicole Prause (self):

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/styles/large/public/Prause%20t wweting%20CBC%20ombudsman%20on%2012-18-13.JPG?itok= XkUEvTP https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/Tweet-%20report%20therapists%20to%20state%20boards 8-8-14-500x189.JPG https://www.yourbrainonporn.com/sites/vourbrainonporn.com/files/resize/9-14%20-

%20report%20therspists%20-%20again-360x134.JPG

In lab coat by Neal Preston

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/paruse%20tweets%20ley %20post-300x127.ipg

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/11-3-16-

%20Prause%20claims%20news%20story%20about%20twitter%20suspension-300x200.JPG

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/prause%20attacking%20

Gola%20and%20Potenza%20on%20study%20site2-600x335.jpg

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/ley%20joke%20-

Prause%20neckbeard 0-450x582.JPG

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/prause%20call%20belind a%20liar-400x191.JPG

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/alex%20-

%20stick%20to%20sceince-600x208.JPG

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/Prause%20suggesting%2 0sex%20worker%20to%20porn%20addict-850x737.JPG

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/3-5-18%20-

%20Prause%27s%20account%20is%20banned%20-wo-600x389.JPG

With article author by Piero Giunti:

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/Prause%20claims%20nofap%20drove%20gay%20teen%20to%20suicide-400x281.JPG

 $\underline{\text{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/two\%20friend\%20no\%20} \\ on\%2060-300x166.JPG$

 $\underline{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/fire\%20landman-350x170.JPG$

 $\frac{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/ftnd-400x361.JPG}{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/noah%20church-400x165.JPG}$

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/1-18-17%20-%20Dissing%20Fred%20Toates-400x168.JPG

 $\underline{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/prause\%20lying\%20about\%20MDPI-400x206.JPG}$

On motorcycle by California Sunday:

 $\underline{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/styles/large/public/Twitter.Prause.PNG?itok=5W8bKH2G$

In blue dress by PopTech:

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/hall.np_-400x275.PNG Short form

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/1_0-400x381.JPG https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/2_2-400x299.JPG

In jeans jacket by Neal Preston:

 $\frac{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/prause\%20defaming\%20iitap\%20SASH-550x236.jpg$

 $\frac{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/LIST\%20OF\%20DOCU}{MENTS\%20UNDER\%20PT\%20POST2-550x547.JPG}$

In lab coat and punk under by Men's Health:

 $\frac{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/9-14-17\%20-920Prause\%20calling\%20all\%20that\%20believe\%20in\%20porn\%20addiction\%20misogynists_1-600x288.JPG$

We are writing to inform you that our client owns the copyright to all images listed above. We are asking that all of the copyright protected images be removed from the sites listed above, as well as completely removed from their servers immediately. The images are private works created by our clients. No person or entity may copy, publish or distribute the work without the written authorization of our client. Our client chooses to exercise their right to keep their work private. Please be advised that if we do not receive a speedy resolution to this issue, we will be forced to seek out other methods including but not limited to, contacting your affiliate managers and have those affiliate accounts suspended for a violation of their set terms and conditions for affiliates. We will also contact any payment processors and have merchant accounts suspended for violation of their terms and conditions for merchants. We appreciate your application of the law of copyright and the support of our rights in this matter.

This is an official notification under the provisions of Section 512 (c) of the Act on Copyright in the Digital Millennium ("DMCA") to effect the removal of the violations reported. Please note that the law requires you, as a service provider, to "expeditiously remove or disable access to" the images upon receipt of this notification. Failure to comply may result in loss of immunity from liability under the DMCA.

We have a good faith belief that use of the material in the manner complained of herein is not authorized by our client, the owner of the copyright, or the law.

The information provided here is correct to the best of our knowledge. We swear under penalty of perjury that we legally represent the official holder of the copyright and we are authorized to act on their behalf.

Please send to the email address indicated below a quick response indicating the actions you have taken to resolve this matter. Thank you for your help!

Sincerely, / S / Regina Moore

Email: legal@DMCADefender.com
http://www.DMCADefender.com

This message is intended only for the personal, confidential, and authorized use of the recipient(s) named above. Unauthorized interception of this email is a violation of federal criminal law. If you are not the recipient(s), you are not authorized to review, use, copy, forward, distribute or otherwise disclose the information contained in the message. If you have received this communication in error, notify the sender immediately by return email and delete the message and any attachments from your system(s).

Gary Wilson's reply to Dr. Prause's Second DMCA attempt (4/17/18)

Dear Linode,

In case you need details for your records, I see that my harasser, Nicole Prause, has now hired a company to assist her in spurious DMCA takedown requests. Prause is falsely claiming that screenshots of her tweets and Facebook comments are copyrighted material. Nearly all of the screenshots the company complains of can be found on the YBOP page that documents Prause's harassment of myself and others - including researchers, medical doctors, therapists, psychologists, former UCLA colleagues, a UK charity, men in recovery, a TIME magazine editor, several professors, IITAP, SASH, Fight The New Drug, the academic journal Behavioral Sciences, and the head of the academic journal CUREUS. See - https://www.yourbrainonporn.com/nicole-prauses-pdf-her-span-lab-website

As stated in response to Prause's previous DMCA attempt, my website is a clearing house for news related to claims about porn's effects. It is my understanding, based on legal advice, that Tweets are not copyrightable, nor are images of them protected by the DMCA. With this request, Prause is

attempting to remove evidence of her harassment, cyber-stalking and defamation. Unless the law itself changes, the screenshots need to remain.

This DMCA take-down request appears to be the latest in a long string of harassment incidents. Dr. Prause has tweeted about me nearly 100 times, while I never tweet about her (other than correcting a few of her lies). In fact, Prause attacked me yet again on twitter yesterday: https://twitter.com/NicoleRPrause/status/986387599XXXXXXXXXXXXXX2482048

Prause has used dozens of fake usernames to post comments about me on porn recovery forums

https://www.yourbrainonporn.com/nicole-prauses-pdf-her-span-lab-website#july2013

https://www.yourbrainonporn.com/nicole-prauses-pdf-her-span-lab-website#ybr

https://www.yourbrainonporn.com/nicole-prauses-pdf-her-span-lab-website#cbc

Prause has created (and linked to) an Amazon AWS page to libel and harass me and various others: https://s3-us-west-

<u>1.amazonaws.com/weilerdefamation/PressRelease_DefamationBySenatorWeiler.txt</u>. Prause has an additional 10 Amazon pages about me – all contain false allegations and faked 'evidence.'

Just prior to Prause's first DMCA takedown attempt, she placed my employment records from Southern Oregon University on several venues, including Twitter, Quora, and an adult industry website. Prause falsely claimed that I was fired (I wasn't), and that I had never before taught at SOU (I had). All explained here: https://www.yourbrainonporn.com/libelous-claim-gary-wilson-was-fired.

The outcome was that Prause was permanently banned from Quora, was temporarily banned from Twitter. In response to my request, the adult industry website (http://mikesouth.com/scumbags/dr-nicole-prause-destroys-yourbrainonporn-dont-fall-22064/) subsequently deleted Prause's libelous "article." This incident apparently spurred Prause to attempt to her two specious DMCA takedown requests. Again, I regret that she is wasting Linode's time in this way.

Gary Wilson

Nicole Prause's Third DMCA Attempt (10/10/18)

Identification of the material that is claimed to be infringing and information reasonably sufficient to permit the service provider to locate the material.

https://primemind.com/sex-addiction-porn-and-the-brain-a6429c8402b2

Identify the infringing material that should be removed, as well as all relevant information needed for Linode to locate it.

 $\frac{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/Prause\%20claims\%20nofap\%20drove\%20gay\%20teen\%20to\%20suicide-400x281.JPG$

 $\underline{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/two\%20friend\%20no\%20} on\%2060-300x166.JPG$

 $\underline{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/fire\%20landman-350x170.JPG$

 $\frac{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/ftnd-400x361.JPG}{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/noah%20church-400x165.JPG}$

https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/1-18-17%20-%20Dissing%20Fred%20Toates-400x168.JPG

 $\frac{https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/prause\%20lying\%20abou}{t\%20MDPI-400x206.JPG}$

Information reasonably sufficient to permit the service provider to contact the complaining party, such as an address, telephone number, and, if available, an electronic mail address at which the complaining party may be contacted.

pierofgiunti@gmail.com

Provide a statement that you, in good faith, believe that the use of this material in the manner mentioned in this complaint is not authorized by the copyright owner, their agent, or by the law.

Use of this material in this manner has not been authorized by the copyright owners, their agent, or the law. Press and Morel

(https://beckermanlegal.com/Lawyer Copyright Internet Law/agencefrancepresse morel 130521 Decision.pdf) established that taking a picture of a picture, specifically from social media, still violates copyright.

Provide a statement that the information you've provided in this notification is accurate and under penalty of perjury that you are the owner, or are authorized to act on behalf of the owner regarding exclusive use rights that are allegedly being infringed.

The information in the notification is accurate, and under penalty of perjury, I am the owner of the copyright that is infringed.

A physical or electronic signature of the copyright owner or the person authorized to act on their behalf.

Piero Giunti

Piero F Giunti
Visionary Rebel Productions. TM
818-841-5591
PieroFGiunti@gmail.com
www.PieroFGiunti.com
IG: @VisionaryRebel2

Gary Wilson's reply to Dr. Prause's Third DMCA attempt (10/10/18)

Dear Linode,

All the URL's listed are screenshots of Nicole Prause tweets, and can be found on this page that was created to counter the ongoing harassment and false claims made by Nicole Prause: https://www.yourbrainonporn.com/nicole-prauses-pdf-her-span-lab-website

The current complaint is by an agent for Nicole Prause and has been dealt with before. See this Linode ticket from 6 months ago: https://manager.linode.com/support/ticket/10163746
Please re-visit that ticket. This is Dr. Prause's third unfounded attempt to have evidence of her tweets removed from my website. After she wrote you the first time and failed to achieve her objective, she hired a company to make a request. Now, she has second company attempting a spurious DMCA takedown.

As explained in two previous Linode tickets, Nicole Prause has been harassing and defaming many people, including me, for the past 6 years. In response to Dr. Prause's widespread harassment I have created the following page to catalog (and refute) her libelous statements and false assertions: https://www.yourbrainonporn.com/nicole-prauses-pdf-her-span-lab-website

Dr. Prause is currently under investigation by the California Psychology Board for the unprofessional, unethical behavior chronicled on the above page. The tweets on my pages are evidence that was provided to the California Psychology Board, and thus part of an ongoing investigation into Dr. Prause's behavior. They should not be removed as she is wrongfully attempting to hide evidence from the State of California and others.

The current ticket submitted by Dr. Prause, or her agent, is once again claiming that screenshots of her defamatory tweets are covered by the DMCA. As stated 6 months ago, it is my understanding, based on legal advice, that tweets are not copyrightable; nor are images of them protected by the DMCA. Dr. Prause's behavior and biases, as documented by her tweets, are essential reading for anyone attempting to understand the politics currently skewing the study and reporting of internet porn's effects. Thus, without solid reason for their removal, they need to remain on YBOP.

Sincerely, Gary Wilson Generated on: This page was generated by TSDR on 2019-03-16 14:21:08 EDT

Mark: YOURBRAINONPORN YOURBRAINONPORN.COM

YOURBRAINONPORN YOURBRAINONPORN.COM YOUR BRAIN ON

PORN

YourBrainOnPorn YourBrainOnPorn.com yourbrainonporn yourbrainonporn.com Your Brain On Porn

US Serial Number: 88281342 Application Filing Jan. 29, 2019

Date:

Filed as TEAS Yes Currently TEAS Yes
Plus: Plus:

er: Principal

Register: Principal

Mark Type: Service Mark

Status: New application will be assigned to an examining attorney approximately 3 months after filing date.

Status Date: Feb. 21, 2019

Mark Information

Mark Literal YOURBRAINONPORN YOURBRAINONPORN.COM YOURBRAINONPORN YOURBRAINONPORN.COM YOUR BRAIN ON PORN

Elements:

Standard Character Yes. The mark consists of standard characters without claim to any particular font style, size, or color.

Claim:

Mark Drawing 4 - STANDARD CHARACTER MARK

Type:

Goods and Services

Note: The following symbols indicate that the registrant/owner has amended the goods/services:

• Brackets [..] indicate deleted goods/services;

• Double parenthesis ((..)) identify any goods/services not claimed in a Section 15 affidavit of incontestability; and

Asterisks *..* identify additional (new) wording in the goods/services.

For: Conducting clinical trials for others; Conducting clinical trials for others in the field of pornography; Medical and scientific research,

namely, conducting clinical trials for others; Providing medical and scientific research information in the field of clinical trials

International 042 - Primary Class U.S Class(es): 100, 101

Class(es):

Class Status: ACTIVE

Basis: 1(b)

Basis Information (Case Level)

Filed Use:NoAmended Use:NoFiled ITU:YesCurrently ITU:YesAmended ITU:NoFiled 44D:NoCurrently 44D:NoAmended 44D:NoFiled 44E:NoCurrently 44E:NoAmended 44E:No

Filed 66A: No Currently 66A: No Filed No Basis: No Currently No Basis: No

Current Owner(s) Information

Owner Name: Nicole Prause

DBA, AKA, DBA Liberos LLC

Formerly:

Owner Address: 11601 Wilshire

Los Angeles, CALIFORNIA 90025

UNITED STATES

Legal Entity Type: LIMITED LIABILITY COMPANY State or Country CALIFORNIA

Where Organized:

Attorney/Correspondence Information

Attorney of Record - None Correspondent

Correspondent NICOLE PRAUSE Name/Address: NICOLE PRAUSE 11601 WILSHIRE

LOS ANGELES, CALIFORNIA 90025

UNITED STATES

Phone: 323-919-0783

Correspondent e- nprause@liberoscenter.com nicole.prause@gmail

mail: .com

Correspondent e- Yes mail Authorized:

Domestic Representative - Not Found

Prosecution History

Date	Description	Proceeding Number
Feb. 21, 2019	NEW APPLICATION OFFICE SUPPLIED DATA ENTERED IN TRAM	
Feb. 01, 2019	NEW APPLICATION ENTERED IN TRAM	

TM Staff and Location Information

TM Staff Information - None

File Location

Current Location: NEW APPLICATION PROCESSING Date in Location: Feb. 21, 2019

FITCHEVEN



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 (nprause@liberoscenter.com) Confirmation by U.S. Mail and Courier

Dr. Nicole Prause Liberos LLC 11601 Wilshire Los Angeles, CA 90025

Re: Unauthorized Use of YOUR BRAIN ON PORN

Our Ref. No. 8956-145727

Dear Dr. Prause:

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

Case 2:19-cv-01366-MPK Document 20-11 Filed 01/24/20 Page 36 of 123

Dr. Nicole Prause May 1, 2019 Page 2 of 3

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

features the stylized logo, Science not shame, 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 and confirm in writing that you have done so;
- (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 your 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 and confirm in writing that you have done so;
- (4) Remove from social media sites, including, but not limited to, Twitter (https://twitter.com/BrainOnPorn), Reddit (https://www.reddit.com/user/sciencearousal),

Case 2:19-cv-01366-MPK Document 20-11 Filed 01/24/20 Page 37 of 123

Dr. Nicole Prause May 1, 2019 Page 3 of 3

Facebook (https://www.facebook.com/realyourbrainonporn/), Tumblr, and YouTube (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) Withdraw and expressly abandon with the U.S. Patent and Trademark Office U.S. Application Serial No. 88281342 for YourBrainOnPorn YourBrainOnPorn.com yourbrainonporn yourbrainonporn.com Your Brain On Porn and confirm in writing that you have done so;
- (6) 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;
- (7) Refrain from search engine optimization on the wording YOUR BRAIN ON PORN and REAL YOUR BRAIN ON PORN; and
- (8) 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

also Simmons

Alisa C. Simmons

Enclosures





Sexuality often is a source of panic in the United States. When the vibrator appeared, the panic was that women would no longer net 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.

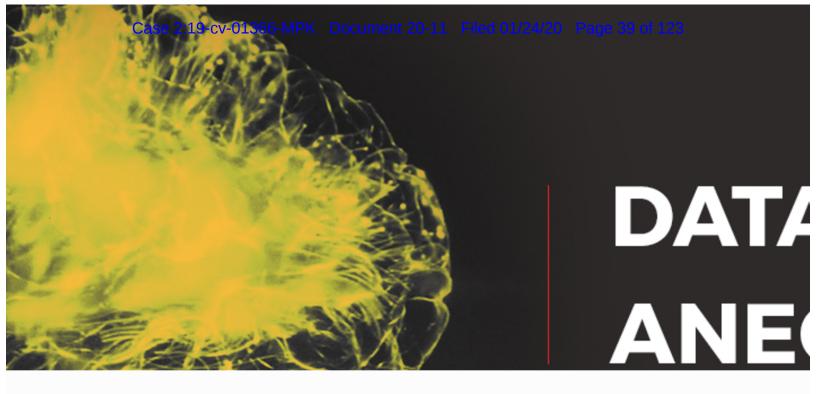
We are a group of experts trained in and/or researching the effects of sex films. We do not advocate for (or against) viewing sex films as any blanket recommendation. We are willing to connect with media and colleagues, to provide accurate, balanced, science-based information.

Avoid the $\underline{\text{Damian Sendler}}$ error, talk to experts in sexuality!









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 <u>Damian Sendler</u> error, talk to experts in sexuality!



Feel free to read the research yourself on our "Research" page



Reach out to us individually on our "experts" page.



Find more balanced news resources on our selective "In the News" page.

HOME RESEARCH EXPERTS NEWS SITEMAP

 \boxtimes

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

Capture ID: f1d34d7f-f942-4e70-a80c-966ecc68d2d2

User: fitcheven-user4



United States <u>Australia</u> <u>India</u> Hong Kong England

More Countries

Industry News

All News

Exclusive News

April 2019





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.

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

https://www.prloq.org/12765427/1 .. End .

f le in @ < Y Follow Embed PDF / Print

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 🗸 <u>Disclaimer</u> Report Abuse

Page Updated Last on: Apr 18, 2019

SiteMap | Privacy Policy | Terms of Service | Copyright Notice | About | Advertise

Like PRLog?

9K 2K 1K

F 🕒 in

Document title: New website "RealYourBrainOnPorn.com" launches for scientifically

accurate information about pornography -- Real Your Brain On Porn | PRLog

Capture URL: https://www.prlog.org/12765427-new-website-realyourbrainonporncom-

launches-for-scientifically-accurate-information-about-pornography.html

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

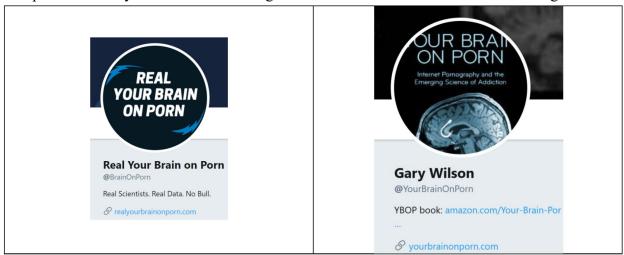
Capture ID: 1d44e179-5992-41f7-b7f0-bc55077ed01b

User: fitcheven-user4

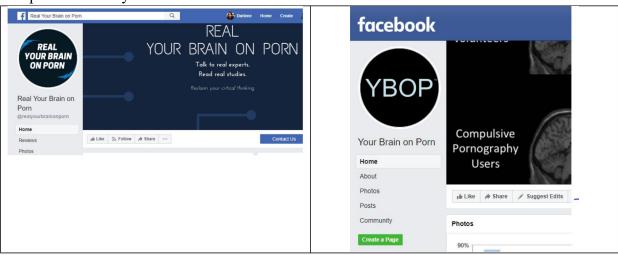
Exhibit G

"Real" Your Brain on Porn Twitter and Facebook account purposely confusing.

Comparison of Gary Wilson's Twitter Page and the RealYourBrainonPorn Twitter Page:



Comparison of Gary Wilson's Facebook and the RealYourBrainonPorn Facebook:



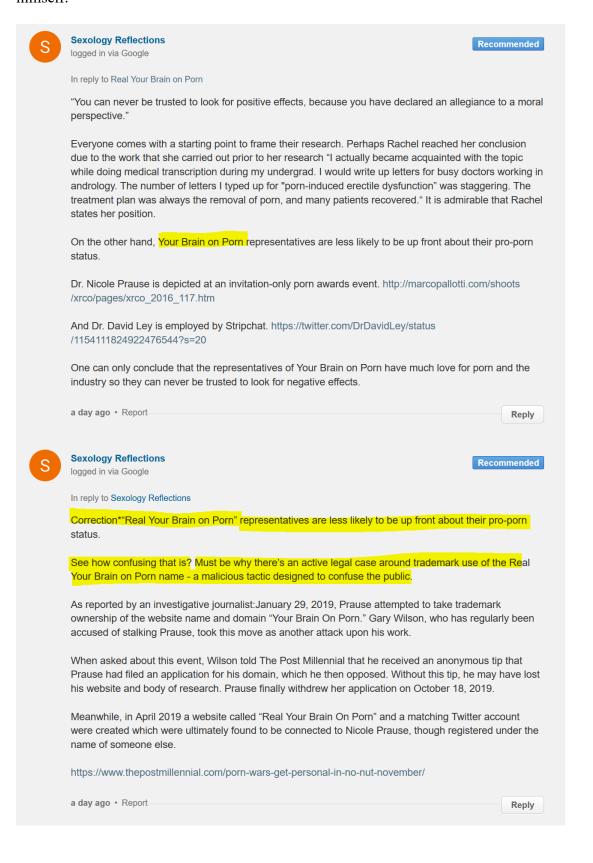
An emailed link to www.realyourbrainonporn.com/ shows up as YBOP & Your Brain on Porn: https://www.realyourbrainonporn.com/



Anti-porn twitter account mistakenly refers to @BrainOnPorn as Gary Wilson's Twitter account @YourBrainOnPorn



A commenter mistakenly refers to YourBrainOnPorn as *Real*YourBrainOnPorn, then corrects himself:



Lawrence A. Poltrock Jennifer K. Poltrock Wayne B. Giampietro

POLTROCK & GIAMPIETRO

Attorneys and Counselors
123 W. MADISON STREET, SUITE 1300
CHICAGO, IL 60602
(312) 236-0606; FAX (312) 236-9264
wgiampietro@giampietrolaw.com

Kurtis R. Hale

November 19, 2019

Mr. Christopher S. Aker CEO LINODE, LLC 249 Arch Street Philadelphia, PA 19106

VIA EMAIL: caker@linode.com and U.S. Mail

Re: Dr. Nicole Prause; Your Brain on Porn

Dear Mr. Aker:

We are counsel to Dr. Nicole Prause. Your organization is the web host for the website "https://www.yourbrainonporn.com" which is the vehicle by which Gary Wilson has engaged in a constant barrage of untrue, defamatory attacks upon Dr. Prause. Among other things, Linode, LLC maintains a data center in Fremont, CA. Since Linode, LLC is engaged in business in the State of California, it is subject to the laws of that State.

We are herewith serving upon Linode, LLC, a Written Demand pursuant to California Government Code Section 6208, that it cease and desist from publicly posting or displaying on the Internet, either through the web site "https://www.yourbrainonporn.com" or in any other manner, any information which identifies Dr. Nicole Renee Prause or her home address. The complete formal demand is enclosed herewith, as well as a copy of California Government Code Section 6208.1.

Should Linode, LLC fail to heed this demand, Dr. Prause reserves the right to commence suit against Linode, LLC pursuant to the terms of that statute, which suit will seek the damages authorized by that statute, plus Dr. Prause' attorneys fees.

I am available to discuss this matter at any time during normal business hours, should you wish to do so.

Very truly yours,

Wayne B. Giampietro

WBG/afd cc: N. Prause

FITCHEVEN



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 Simmons, Esq. asimmons@fitcheven.com

October 4, 2019

Via Email (<u>wgiampietro@giampietrolaw.com</u>) 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: < PUBLIC@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

Alsa Simmons

Alisa C. Simmons

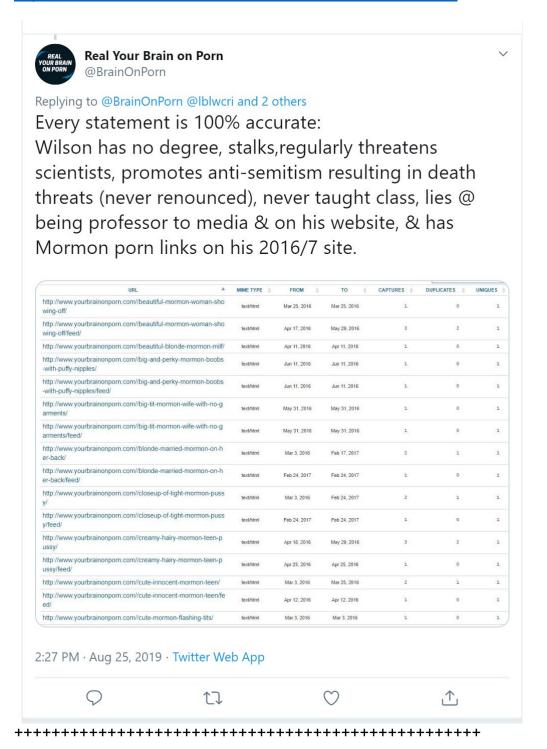
Enclosures

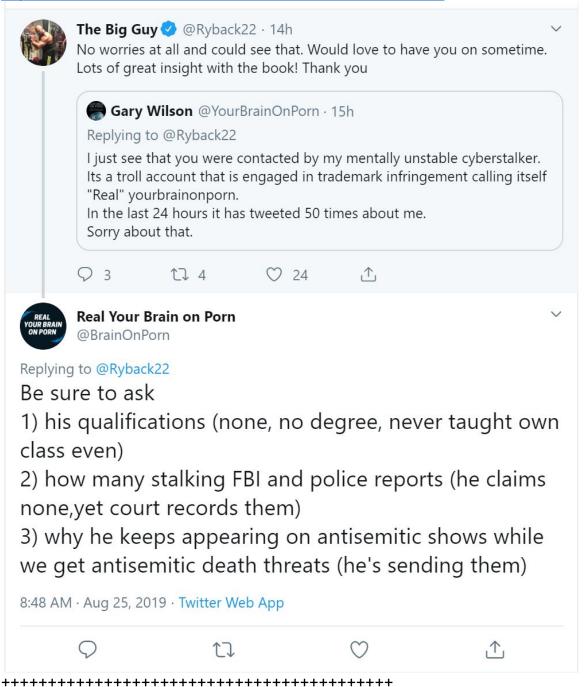
cc: John M. Naber, Esq.

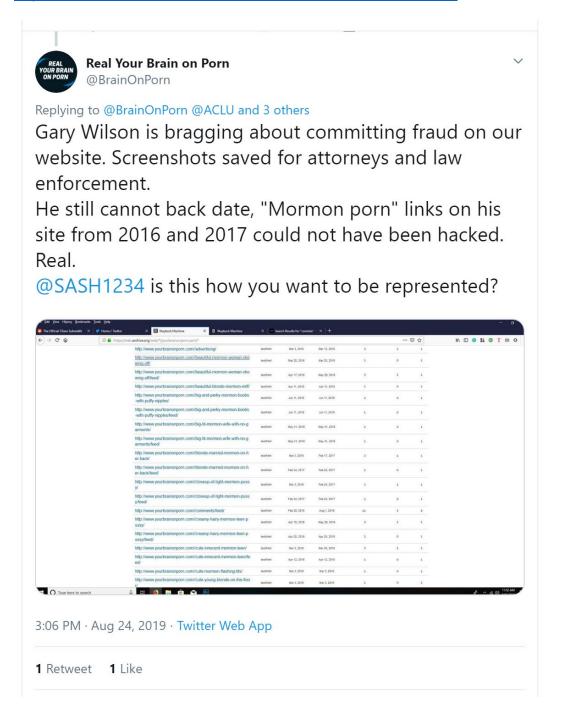
Enclosures

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









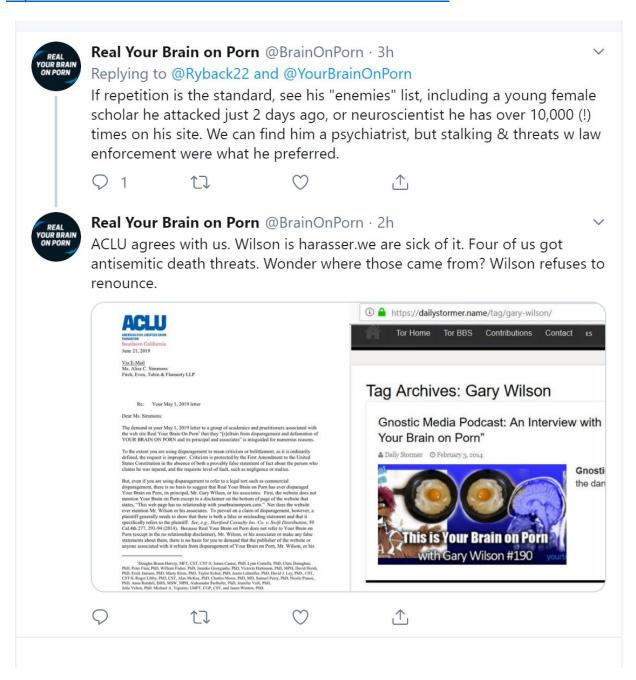


Exhibit J

Real Your Brain On Porn email sent to the National Center on Sexual Exploitation

----- 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: < PUBLIC@ncose.com >

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

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.

Exhibit K

<u>Twitter account (@BrainOnPorn) tweeted the personal LinkedIn page of the mother of my son, which I interpreted as a threat.</u>

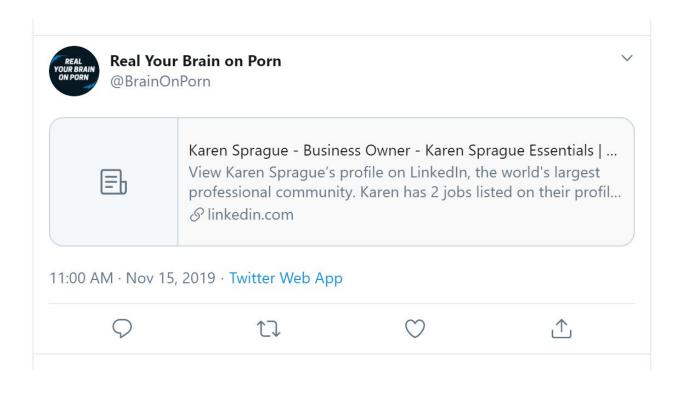
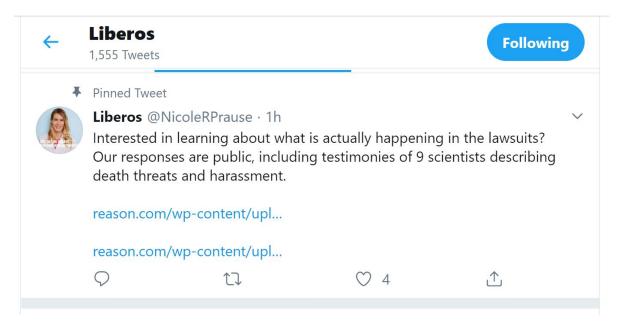


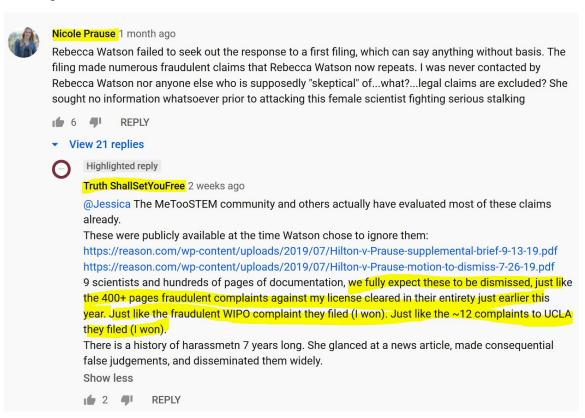
Exhibit L

Prause posting links to her purported support for her Motion to Dismiss (Hilton v. Prause)

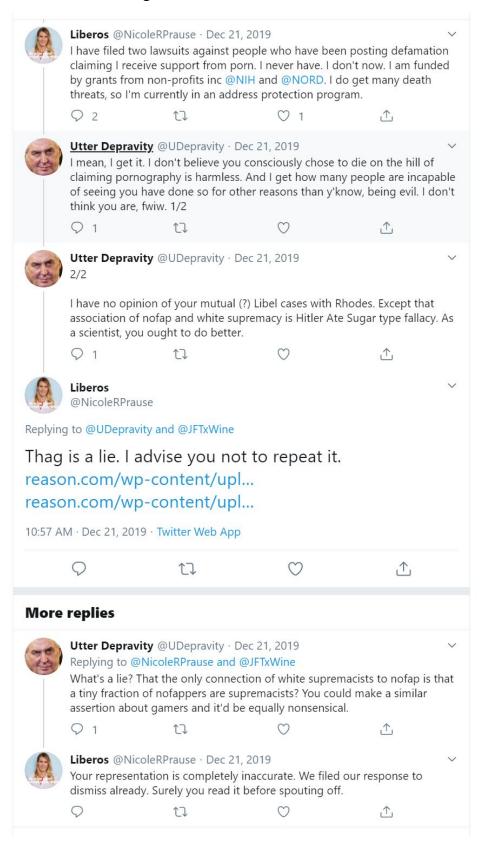
Pinned tweet with links.



Prause posts links in a comment under a Rebecca Watson YouTube video



Prause tweets links again



Apparent Prause alias (@BrainOnPorn) tweet the links in a thread about me.



Note: I have created a thorough rebuttal to all of her claims about me, endeavoring to sort lies and half-truths from actual events (https://www.yourbrainonporn.com/relevant-research-and-articles-about-the-studies/critiques-of-questionable-debunking-propaganda-pieces/nicole-prause-david-ley-commit-perjury-in-defamation-lawsuit/).

Exhibit M

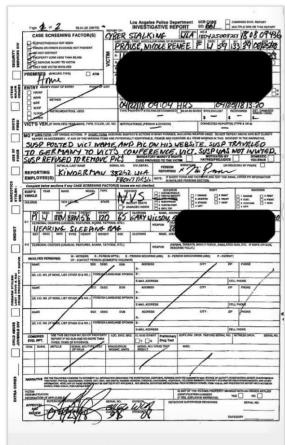
March, 2019: Dr. Prause persuaded student editors Karley Betzler and Samantha Stroozas at University of Wisconsin – Lacrosse to publish her false report online ("The Racquet Investigates: Fight the New Drug"). Screen shot of first page of the article:

Prause wrote, "Dear Cru, As you consider how to express your personal values around sex films, I encourage you to consider not promoting sexual harassment in your selection of Fight The New Drug for a presentation."

Prause wrote about her experiences with an individual that she had filed a stalking report against with the Los Angeles Police Department. Prause explained that this individual is used as a resource on Fight the New Drug's (FTND) website. The individual is cited in 21 articles on FTND's website.

In an interview with *The*Racquet, Prause said, "So, when Fight
the New Drug started posting his stuff, I
was just floored." Prause went on to say,
"Anyone's allowed to have their opinion
about this stuff, but do not promote
someone who is stalking and
threatening scientists. Like, that is not a
joke."

Later, after being asked if anyone from Cru had responded to Prause's email, Cru Area Director Luke Rickert said, "I did not know we were supposed to have a response to that. She did not ask a question or elicit any kind of action. I felt like it was an opinion that she had." Prause stated that she did not receive a response from UWL's Equity and Affirmative Action Office either. The office declined a request for comment.



Stalking report filed by Dr. Nicole Prause; sent to The Racquet by Prause.

This email raised a question about

FTND: Should UWL students use them as a reliable resource regarding information about pornography?

First page of Nicole Prause's false police report

	Page	. 1	ัช 2	63,01,00 (0	8/15) 🥗		Los Angeles INVESTIG			R CODE		BINED EVID. REPORT TIPLE DRS ON THIS R	EPORT
1		,	-	FACTOR(REPORT OF:	TALK	NE.		042500	825/	120809	1436
		USPECT/V	EHICLE NOT SE		<i>•</i>	<u> PKA</u>	FIRST, HIDDLE (O	R NAME OF BUSI	NEE P	DESC ST	133	39 08/2	stro
	ADDRESS R. I GOOD DISTINCT PROPERTY LOSS LESS THAN \$5,000 B. I GOOD DISTINCT PROPERTY LOSS LESS					ADDRESS R. 16	II DARLINGTON AUE APTS LA 9002 \$23-919-678						
			(SPECIFIC TYPE		ATM	E-MAIL ADDI	RESS V . O	SS VICE PROVE BLIPAL OF GELL PHONE NONE, OTHER ID & NO.) FOREIGN LANGUAGE SPOKEN OCCUPATION .					
	ENTRY 466/8FV POINT OF ENTRY POINT OF EXIT LOCATION						3/288 N OF OCCURRENC	E SAME A	N/A	BUS. R.		PRINTS BY PREL	
CRIME						DATE A	O827 ATTEMPT LY N OBTAINED LY N TIME OF OCCURRENCE DATE & TIME REPORTED TO PO						
	∏ R	IDE IOOF	NSTRUMENT/	TOOL USED		TYPE PE	CZ 18 O	7:04 LOST/DAMAGED	HRS 03.04.00 GIVEN	STOLEN/LOST	25/	18 13:20 VERED EST. DAM	łėžo
	مر∏ًا	HER S VEH	(IF INVOLVED)	YEAR-MAKE, TYP	E, GOLOR, 1	LIC, NO. NOTIFIC.	ATION(S) (PERSON	& DIVISION)	- 	S ONNEGTED REPO	\$ RT(8) (TY	\$	
	MOF	ONG FOR	IM, LIST UNIQUE	ACTIONS, IF SE	ORT FORM	, DESCRIBE BUSPE	CT'S ACTIONS IN I	BRIEF PHRASES,	INOLUDING WEAPO	N USED. DO NOT	REPEAT /	ABOVE INFO BUT CLA	RIFY
i	51/3	:PORTAS SP 1	necessary. If VSTE	PANYOFTHEMIS D VICT	METT BNISS	S ARE POTENTIAL ME. ANI	. تحد د	temize and des V 1413 &	SCRIBE ALL ITEUS I VEBS/TE	II BIHT IN DAIBBII	TR/	IN THE NARRATIVE.	
	70	64	RMA	WY 70	Vil	CT'S CO	NFERI	NCE MARSY'S RIGI	VICT. S	USP YA	2 20	77 INUTA	D.
	SUS	PRI	FUSFL	TO RE	MOVE	SERIAL NO.		DED TO THE VIC	SIGNATURE	MOTIVATED B		VIOLENCE ED BY PHONE	
	REPO	RTIN	Kir	VOERI	MI		WEA	PERSON REPORTING	x /hi	Ymn	_		
		OYEE	· ·			FROM	1100,210		T FORM AND VICTH VED PERSONS SEC		SAME, E	NTER PR INFORMATI	ON "
<i>.</i>	Compl SUSP'S				•	CTOR(S) boxes :		EXTERIOR	ne i	BODY	Т	WINDOWS	
	VEHICL		VEH	JE-NO.	STA*	A-0/:	/5	2 PAINTED INSCA	LPT COM	FRED ∭itaFRO	<u> </u>]2 CUST. 🗒 8	ENCH!
	COLONIA) 				2 DAN	OKET SEATS MAGED INSIDE	5 CUSTOM PARKT 8 VINVL TOP			ĮĒ]scufffAlMs ☐ 7]4 LEFY	REAR
J	اع ا	1 5		RN 56	120	5 65	CLOTHING SARY U		ess, dob, ifknow US LRAVI	د خشوا د ه		A . 20 A 44 A4	7520
	S-1 PE			BUAL FEATURES.	SCARS, TA	17009, ETC.) 1846	w	CAPUN DESC	BAL THREATS, BODII BIBE FULLY.)	LY FORCE, BIRULA	TED GUN	I, ETO. IF KNIFE OR G	UN,
	81			SUE F	WEIGH	T AGE	CLOTHING		WE SLEAVI ESS, DOB, IF KNOW			E, IF ARRESTED.	
,	8-2 pg	RSONAL	DODITIES (UNUE	UAL FEATURES,	SCARS, TA	TT008, ETC.)		EARON (VER	BAL THREATS, BOD	LY FORCE, SIMUL	ATED GU?	, ETC. IF KNIFE OR	SUN,
S-2 PERSONAL ODDITIES (UNUSUAL FEATURES, SCARS, TATTOOS, ETC.) WEAPON (VERBAL TRIEATS, BOOILY FORCE, SIMULATED GUN, ETC. IF KNIFE ORI GUN DESORIBE FULLY.)									SENT.				
٠.				144 MANAGES	D DEDO	OV 0070 - 0 F		2100	·	(480): D DA	ZiP		
X .	INVO	LVED PE	RSON(5)		ERSON (DO	MESTIC VIOLENCE	PERSON SECURING	2100	ASON DISCOVERING			I PHONE	
Madre	INVO NA	ME		OP - CONTACT F	erson (do ex desc	DOB DOB	ERSON SECURING	2100	·			PHONE	در
KILL BURKE	INVO NA	ME		OP - CONTACY F	erson (do ex desc	MESTIC VIOLENCE	ERSON SECURING ADDRESS R - B -	(459); D-PE	ASON DISCOVERING		TCELL P		مر
PROPERTY IT SUBVE	INVO NA DR	ME		OP - CONTACT F	erson (do ex desc	DOB DOB LANGUAGE SPOKE	PERSON SECURING ADDRESS R - N B - E-MAR. ADDRESS ADDRESS	(459); D-PE	ASON DISCOVERING		CEIL P		<u> </u>
CHE PROPERTY IT SUBSE	INVOI NA DR	ME LIC. NO.	(IF NONE, LIST (OF - CONTACT F	FOREIGN FOREIG	DOB DOB LANGUAGE SPOKE	PERSON SECURING ADDRESS R - N B - E-MAIL ADDRESS R - ADDRESS R -	(459); D-PE	ASON DISCOVERING			HONE STATE	مر
2	INVO NA DR	ME LIC. NO. AME LUC. NO.	(IF NONE, LIST (OP - CONTACT F	FOREIGN	DOS LANGUAGE SPOKE DOS LANGUAGE SPOKE LANGUAGE SPOKE	PERSON SECURING ADDRESS R. B. E-MAIL ADDRESS R. B. E-MAIL ADDRESS R. E-MAIL ADDRESS	(459); D-PEF	ASON DISCOVERING	TY .	ZIP GELL P	HONE PHONE HONE	<u> </u>
2	INVO NA DR	ME LIC. NO.	(IF NONE, LIST (OP - CONTACT F	FOREIGN FOREIG	DOS LANGUAGE SPOKE DOS LANGUAGE SPOKE LANGUAGE SPOKE	PERSON SECURINGS ADDRESS R. B. E-MAIL ADDRESS R. ADDRESS R. B.	(459); D-PEF	ASON DISCOVERING		ZIP	HONE PHONE	<u></u>
	INVOI NA DR	LIC. NO.	(IF NONE, LIST O	OP - CONTACT F	POREIGN FOREIGN FOREIGN FOREIGN	DOS LANGUAGE SPOKE DOS LANGUAGE SPOKE LANGUAGE SPOKE	RADDRESS R. E-MAIL ADDRESS R. E-MAIL ADDRESS R. ADDRESS R. ADDRESS R. B. ADDRESS R. B. ADDRESS R. ADDRESS R. ADDRESS R. ADDRESS R. ADDRESS R.	(459); D-PEF	ASON DISCOVERING	TY .	ZIP CELL P ZIP	HONE PHONE HONE PHONE	
	INVO NA DR	ME LUC. NO. LUC. NO. LUC. NO.	OF NONE, LIST O	OP - CONTACT F OTHER ID & NO.) OTHER ID & NO.)	FOREIGN	DOB LANGUAGE SPOKE DOB LANGUAGE SPOKE DOB LANGUAGE SPOKE	PERSON SECURING ADDRESS R. E-MAIL ADDRESS R. B. C-MAIL ADDRESS R. ADDRESS R. N B. E-MAIL ADDRE ADDRESS R. N B. E-MAIL ADDRE ADDRESS R. N B. E-MAIL ADDRE	(459); D-PEF	ASON DISCOVERING	TY .	ZIP CELL P	HONE PHONE HONE PHONE	PIAL NO.
	INVO NA DR NA DR DR COMI	LIC. NO.	(IF NONE, LIST O	OP - CONTACT F STHER ID & NO.) OTHER ID & NO.) OTHER ID A NO.) THEN ID A NO.) STION IN TIEU OF GUN AND NO ME	FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN	C DOB LANGUAGE SPOKE DOB LANGUAGE SPOKE DOB LANGUAGE SPOKE LANGUAGE SPOKE	PERSON SECURING ADDRESS R. E-MAIL ADDRES R. N B- E-MAIL ADDRESS R. N B- E-MAIL ADDRESS R. N B- E-MAIL ADDRESS R. ODRESS R. N B- E-MAIL ADDRESS R. ODRESS R. I D. 10.10.00 GIVEN I N	(459); D-PEF	CI CI SUPV.RNV. OF CR.	TY .	ZIP CELL P	HONE PHONE HONE PHONE	FIAL NO.
	INVO NA DR NA DR DR COMI	ME LIC. NO. LIC. NO. LIC. NO. LIC. NO. BINED	(IF NONE, LIST O	OTHER ID & NO.) OTHER ID & NO.) OTHER ID & NO.)	FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN	DOB LANGUAGE SPOKE DOB LANGUAGE SPOKE DOB LANGUAGE SPOKE	PERSON SECURING ADDRESS R. E-MAIL ADDRES R. ADDRESS R. N B- E-MAIL ADDRE ADDRESS R. N B- E-MAIL ADDRE ADDRESS R. N B- E-MAIL ADDRE ADDRESS R. O DRESS R. O DRESS R.	(459); D-PEF	ASON DISCOVERING	TY .	ZIP CELL P	HONE PHONE HONE PHONE	PIAL NO.
	INVOIDR NA DR	ME LIC. NO. LIC. NO. LIC. NO. LIC. NO. BINED RPT.	(IF NONE, LIST OF NONE, LIST O	OTHER ID & NO.)	FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN	C DOB LANGUAGE SPOKE C DOB LANGUAGE SPOKE C DOB LANGUAGE SPOKE C DOB LANGUAGE SPOKE DOB LANGUAGE SPOKE	PERSON SECURING ADDRESS R. E-MAIL ADDRESS R. B. B. C-MAIL ADDRESS R. D.	(459); D-PEF	CI CI SUPV.RNV. OF CR.	TY .	ZIP CELL P	HONE PHONE HONE PHONE	FIAL NO.
	INVOIDR NA DR	ME LIC. NO. LIC. NO. LIC. NO. LIC. NO. BINED RPT.	(IF NONE, LIST OF NONE, LIST O	OTHER ID & NO.)	FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN FOREIGN	C DOB LANGUAGE SPOKE C DOB LANGUAGE SPOKE C DOB LANGUAGE SPOKE C DOB LANGUAGE SPOKE DOB LANGUAGE SPOKE	PERSON SECURING ADDRESS R. E-MAIL ADDRESS R. B. B. C-MAIL ADDRESS R. D.	(459); D-PEF	CI CI SUPV.RNV. OF CR.	TY .	ZIP CELL P	HONE PHONE HONE PHONE	ERIAL NO.
	INVO	ME LIC. NO. LIC. NO. LIC. NO. LIC. NO. BINED RPT. QUAN.	(IF NONE, LIST OF NONE, LIST O	OTHER ID & NO.)	FOREIGN	C DOB LANGUAGE SPOKE WEIGHT, UNITS	PERSON SECURING TO ADDRESS R - E-MAIL ADDRES R - ADDRESS R - ADDR	SS SS Preliminary Drug Test DRUG TEST	CI CI SUPV.RNV. OFGR.	TY TY TESTING SERIAL	ZIP CELL P ZIP CELL P	PHONE PHONE PHONE PHONE NESS OFCR. SI	
	INVO	LIC. NO. LIC	(IF NONE, LIST OF NONE, LIST O	OTHER ID & NO.)	FOREIGN FOREIG	DOB LANGUAGE SPOKE LANGUAGE SPOKE DOB LANGUAGE SPOKE LANGUAGE SPOKE	PERSON SECURING ADDRESS R R B E-MAIL ADDRE ADDRESS R ADDRESS R ADDRESS R B E-MAIL ADDRE ADDRESS R B E-MAIL ADDRE ADDRESS R E-MAIL ADDRESS R E-MAIL ADDRE ADDRESS R E-MAIL ADDRESS R E-MAIL ADDRE R E-MAI	(459); D-PEF 38 7 Preliminary Drug Test PRUG TEST MYCASSING, ADDITIONAL PERSONS I.	SUPV.RNV. OFGR. MISC. NOL VED (papered by by NAL: COLLEGED NOTEBOOK OWN	TY TESTING BERIAL A): SOURCE OF ACTIVITY IN: PROPERTY STOURN DER, FORM IR SOUR, AM	CELL P ZIP CELL P NO. WIT	PHONE PHONE PHONE PHONE PHONE NESS OFCR. SI SATON: ARREST: NATRYANDERBODAMAGED; AND OF ATTIVE REPORT-FELD NOTE.	EDICAL BERT BOOK
	INVO NA DR NA DR NA DR NA DR NA DR NA DR VICTIM NA	LIC. NO. GUAN. LIC. NO.	(IF NONE, LIST OF NONE, PROBLEM NONE, PROPER NONE, NOTE AND REPORT OF NOTE AND REPORT OF NONE, NOTE AND REPORT OF NOTE AND REPORT	OTHER ID & NO.) ETION IN LIEU OF DOUBLE OF BRIDE NO. SERVAL NO.TYL OF DRUG EXORNER TO DOCUME EXORDER TO DOCUME EXORNER TO DOCUME	FOREIGN FOREIG	DOB LANGUAGE SPOKE LANGUAGE SPOKE DOB LANGUAGE SPOKE LANGUAGE SPOKE	PERSON SECURING ADDRESS R R B E-MAIL ADDRE ADDRESS R ADDRESS R ADDRESS R B E-MAIL ADDRE ADDRESS R B E-MAIL ADDRE ADDRESS R E-MAIL ADDRESS R E-MAIL ADDRE ADDRESS R E-MAIL ADDRESS R E-MAIL ADDRE R E-MAI	SS SS Preliminary Drug Test DRUG TEST NITIONAL PERSONS IN NIVABBING ADDITIONAL PERSONS IN NIVA	SUPV.RNV. OFGR. MISC. NOL VED (papered by by NAL: COLLEGED NOTEBOOK OWN	TY TESTING BERIAL a); SOURCE OF ACTIVITY TY PROPERTY STOLEN SER, CON 18300, AN MALERY	CELL P ZIP CELL P NO. WIT	PHONE PHONE PHONE PHONE HONE AND ARREST: NATIONAL ARREST:	EDICAL BERT BOOK
	NA DR	LIC. NO. LIC. N	(IF NONE, LIST OF NONE, LIST OF NONE, LIST OF NONE, LIST OF THE SEC REPORT IF NOT THREE ITEMS ARTICLE THE FOLLOWING HATLENIT, PROTOS, PROMICIO, NOTE AN DER, NOTE AND DER	OTHER ID & NO.) EXEMPT ID & NO.) EXEMPT ID & NO.) EXEMPT ID & NO. OF EVIDENCE. EXEMPT ID & NO. OF EVIDENCE. EXEMPT ID & NO. OF EXEMPT ID & NO. FOR IT IN	FOREIGN FOREIG	DOB LANGUAGE SPOKE LANGUAGE SPOKE DOB LANGUAGE SPOKE LANGUAGE SPOKE	PERSON SECURING ADDRESS R R B E-MAIL ADDRE ADDRESS R ADDRESS R ADDRESS R B E-MAIL ADDRE ADDRESS R B E-MAIL ADDRE ADDRESS R E-MAIL ADDRESS R E-MAIL ADDRE ADDRESS R E-MAIL ADDRESS R E-MAIL ADDRE R E-MAI	SSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSS	SUPV.RNV. OFGR. MISC. NOLVED Quagarited by MAY- MAL COLLISCHIOL MITTEROOK CHAP IS ARRY OF TAIL CHAP IS ARRY	TY TESTING SERIAL IN PROPERTY STOLEN OFF, FORM IS DOLLO, AN HIM'S PROPERTY M MEET!	ZIP GELL P JP GELL P OFFICE OFFIC	PHONE PHONE PHONE PHONE HONE AND ARREST: NATIONAL ARREST:	EDICAL BERT BOOK
	INVO NA DR N	LIC. NO. CUAN. LIC. NO. CUAN	(IF NONE, LIST OF NONE, PROPER OF NONE, PROPER OF NONE, NOTE AND SER, POPPLICABLE.	OTHER ID & NO.) EXEMPT ID & NO.) EXEMPT ID & NO.) EXEMPT ID & NO. OF EVIDENCE. EXEMPT ID & NO. OF EVIDENCE. EXEMPT ID & NO. OF EXEMPT ID & NO. FOR IT IN	FOREIGN FOREIG	DAMESTIO VIOLENCE DOB LANGUAGE SPOKE BRAND/JORNA WEIGHT, UNITS	ERSON SECURING ADDRESS R. E-MAIL ADDRES R. B-MAIL ADDRES R. N B- E-MAIL ADDRES R. L DIO 00 GIVEN RESULT E-MASSINATION: ADDRESS DOCKMENT EVICENCE: G. L SEE GEVERNALIEN	SSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSS	SUPV. RNV. OF CR. MISC. MAY US (LIGHT MISS AND	TY TESTING SERIAL IN PROPERTY STOLEN OFF, FORM IS DOLLO, AN HIM'S PROPERTY M MEET!	ZIP GELL P JP GELL P OFFICE OFFIC	PHONE PHONE PHONE PHONE HONE NESS OFCR. SI SATON; ARREST; NAURYAN PURICUMANAGED; AND CO ATTIVE REPORT FEED HORE TITH AN OWNER APPL NO SERIAL NO.	EDICAL BURT BOOK

Second page of Nicole Prause's false police report:

CONTINUATION SHEET

Γ	PAGE		TYPE OF RE	PORT			DR NO.			
١	2 OF 2		CYBER STALKING						18	08 09436
	ITEM NO.	QUAN.	UAN. ARTICLE SERIAL NO. BRAND MODEL NO. MISC. DESCRIPT				ON (COLOR, SIZE, ER, REVOLVER, E		DOLLAR VALUE	

Source Of Activity:

On 04-25-18 at approx 13:20 hours, I Officer Kinderman # 38242 was assigned to West LA Division Patrol W-2 in full uniform. I was assigned to the front desk. Vict-Prause walk in to WLA Station to file a report for a " Cyber Stalking". Inc# 180425008251

Investigation:

Vict-Prause stated the following: Susp -1 posted victims (30) pictures and listed her name (3000) on his website: YourBrainonPorn.com. Victim contacted Susp-1 and asked him to remove the pictures from his website. Susp-1 refused. On 04/22/18 09:04 hours Victim was schedule to attend conference. Susp-1 was not invited to the conference. Susp-1 decided to attend the conference anyway. Victim did not go to conference due to fear of meeting the Susp-1.

Vict didn't provide any further information.

Inj/Med Treatment:

N/A

Photographs/Recordings/Digital Imaging/BWC/DICV:

N/A

Evidence:

N/A

<u>Additional</u>:

I give Vict- Prause a Marcy's Rights Pamphlet.

Property Taken:

N/A

Canvassing:

Desk Report

Court Info:

I can testify in court as to the contents of this report.

15,09.00 (10/81)

Exhibit N

Dismissal of malicious report filed with the Oregon Board of Psychology claiming that I was practicing psychology without a license.

July 2, 2018

Gary Wilson 545 Grandview Ashland, Oregon 97520

Re: Disposition of Case #2018-008

Dear Mr. Wilson,

The Oregon Board of Psychology received a complaint that alleges your conduct may have violated governing Board rules and/or statutes. The complaint alleges that you have been practicing psychology without a license. The Board has completed its investigation into the above referenced complaint. The Board considered this case at its meeting of May 11, 2018, and voted to dismiss the complaint.

The Board will take no further action on this issue at this time. The Board appreciates your patience and cooperation during the investigative process. Please consider this letter to be official notice of the action taken by the Board.

This matter will be retained for records only and may be considered by the Board should similar concerns be raised in the future. Oregon State Law requires all complaints and information gathered during an investigations to remain confidential and are not subject to public inspection.

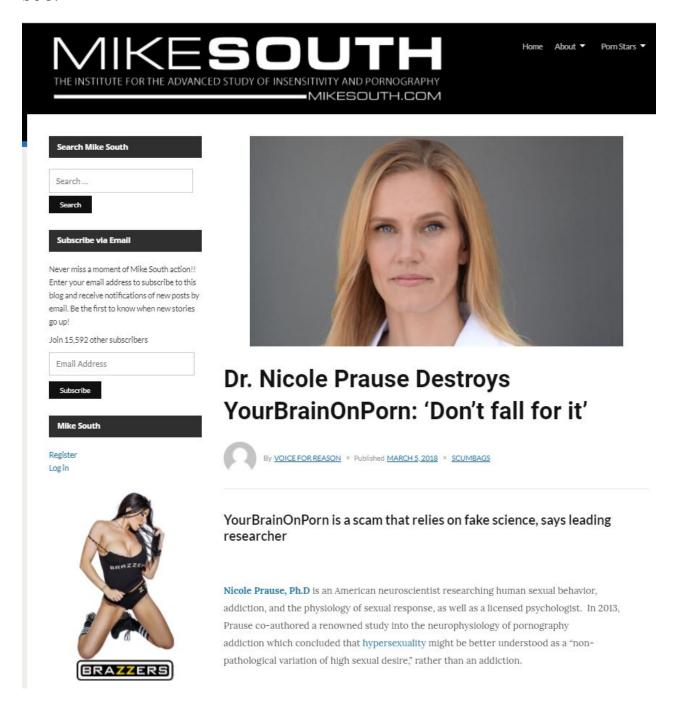
Please contact me if you have questions or concerns.

Respectfully,

Allison D. McGonagle State Investigator 503-373-1149

Exhibit O

Prause obtained my redacted SOU employment records, and then had articles placed (including this one on a porn industry site, MikeSouth.com) falsely stating that I was fired from Southern Oregon University. (Original url: http://mikesouth.com/scumbags/dr-nicole-prause-destroys-yourbrainonporn-dont-fall-22064/). Prause has also tweeted multiple times that I was fired from SOU.





The outspoken Prause and her research have been targeted by Mormon-funded anti-porn groups.

Saturday, on Quora, Prause laid waste to anti-porn advocates YourBrianOnPorn, adding to the chorus of jeers at fear-based scams masquerading as science.



Most Popular on Mike South



Your Brain On Porn is run by someone with no scientific training with many warnings online that his science is fake. The author claims to have been a "professor in Biology". In reality, he was supposed to be an undergrad instructor, not a professor, for a lab section at Southern Oregon University. He was fired without pay immediately before completing even a quarter.



						BUDGET STA	CHANGE 20				
1. EMPL	OYEE NAME:	Garul	UilSEN		SN;	ter	ployee Category	e uc			
REASON	FOR ACTION						noter, Softer To				
CHA	NGE IN:		FR	ом		то					
1. DEPART	MENT						Biology				
3. CLASS T POSITIO							31				
4. POSETIO	N No.	FATE	TO.								
S. APP'T. T	YTE		O Periodes PT	E During Terry_	_	U Pub-cine	O Familie F79 D	uray Twee,			
n App's To	ten :	Nex 7 We	m 093 Mos 01	6 Mos □ (2 Mos		Mac II 9	Nice 0 23 May 2 10 6	fex ∓ i2 Mos			
1. Of App	1. Dates	From 1.1	To / /		Print / /	TH 1.7	100				
S. BATT OF During A	PAY op's TexneThess	MONTHLY ANNUALLY HOUSELY			Appril. 18	MONTHLY S	ANNUALLY INCOMES Apply				
9. EMP.CA	75000KY		dreivienerve Fac e Prefinsional, G		D Faulty, D D Administra	© Fearity, © Administrative Faculty © Administrative Professional, © Classified					
IS ACADE	MIC BANK		-								
II. REPRES	ENTATION										
12. CHANG	E CONTRACT	D Fixed term D Fixed term or	, Yr(x) Romanable ra-conswable		Ci Flood error Ci Flood error Ci Verminal, C	D Indefinite Tower Provest Instalt					
				OSTERON BLEIG	ET CHANGE	DATA					
		FROM	PTE %	70	FIE %	SPERCTIVE		AMOUNT			
13. DEDEK	ODE										
14. INDEX:	1004										
LS. BKDECK	10000										
16.	PAY 51	ATUS CHANGE	TO: (check all the	at apply and attach	supporting due	(before a among					
RHSKIN	LWOF 1.2	FMLA []	SEARCH & RESCUE []	OTHER:]	PROM Date DEFECTIVE		PAVROLL USE O Boseft Change: 70				
RITTIRE	THRMINIDIE	ECCCATION LOAVE []	MILITARY	JURYDUFY	TO Date HERECTIVE	10 /30 10	PROPERTY AND ADDRESS OF THE PARTY AND ADDRESS				
COMMENT	50_										
				APPE	OVALS						
11. REQUES	TED-DY: DEPAR	TIMENT KA	LA					DATE //-3-/6			
8. AUTHOR		DATE 11-4-1									
IS APPROVED BY HUMAN RESOURCES.								DATE /4-8-1			
ni a ministra	ED BY BUDGET		- 4	12 0				DATE /1-10-1			

Recent MikeSouth.com Comments

mharris127 on Consent Coercion and Ro



Recent MikeSouth.com Comments

mharris127 on Consent, Coercion and Rough Race Play Gone Wrong: Who's Looking Out For Adult Performers? mharris127 on With friends like Adriana Chechik, who needs enemies. mharris127 on Muslim passenger strips naked, masturbates to porn, and pees at his seat during flight to Bangladesh mharris127 on Trinity St. Clair Caught Secretly Filming Sessions with Johns and Selling The Videos Without Their Knowledge joeschmoe on Trinity St. Clair Caught Secretly Filming Sessions with Johns and Selling The Videos Without Their Knowledge I am The Man from Nantucket on On International Women's Day, Feminist Democrat Barbara Boxer Calls a Porn Star a Source of Embarrassment, Humiliation On International Women's Day, Feminist Democrat Barbara Boxer Calls a Porn Star a Source of Embarrassment, Humiliation - Mike South on Hollywood Hypocrites Judd Apatow completing even a quarter.



Further, his TEDx talk carries a fraud warning.



Examples of Prause tweeting false claim that I was fired from Southern Oregon University:



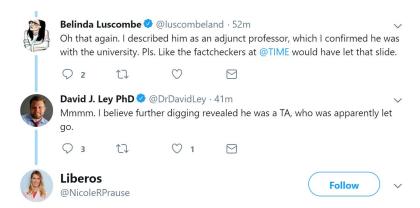
His only "paper" in a predatory journal, with no editor, recommended for retraction due to fraud by independent COPE review:

retractionwatch.com/2018/06/13/jou ...

We FOIA the place he claims he was a professor: actually "terminated" from only undergrad lab assistant TA w/o any degree.



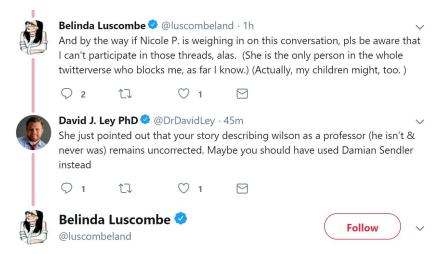




Replying to @DrDavidLey @luscombeland and 3 others

An undergrad he defaulted on his student loans and dropped out. I was an undergrad TA for two courses at Indiana University. IU would have sanctioned me if I had called myself a professor!

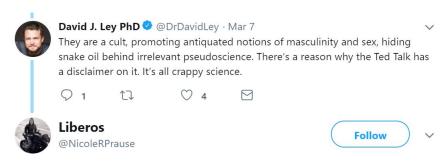
11:03 AM - 1 Apr 2019



Replying to @DrDavidLey @socofthesacred and 2 others

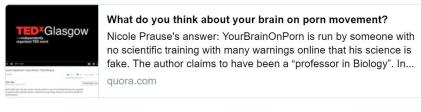
Oh that again. I described him as an adjunct professor, which I confirmed he was with the university. Pls. Like the factcheckers at @TIME would have let that slide.

10:42 AM - 1 Apr 2019



Replying to @DrDavidLey @tunaifreitas and 2 others

Ditto....With documentation of fake professional status, paid off by anti-porn organization @brain_love_sex (also created his pseudoscience TEDx talk), and more



1:39 PM - 7 Mar 2018

SOU employment records confirming that I was not fired

						UDGET STA ONTRACT C	TUS CHANGE HANGE	240092	8324	
1. EMPLO	YEE NAME:	Gary U	DITSON	S	SN:	(mj	oloyee Category	9 <u>4/009</u> 2 v: U		
REASON FOR ACTION Reclass, Dequity Adjustment, Demotion, Reassignment, Transfer, Tother Tevra under Work Out of Class, Dead Work, Special Merit, Reorganize (add/drop FTE), Change Status										
CHANGE IN: FROM TO										
2. DEPARTM	MENT						Biology			
3. CLASS TY POSITION							-31			
4. POSITION	No.	FREB	IO							
5. APP'T. TY	PE	□ Full-time	O Part-time FTE	During Term		□ Full-time	□ Part-time FTE De	ıring Term_	_	
6. App't. Terr	n	Mos:□ 9Mo	3 □ 9.5 Mos □ 10	Mos □ 12 Mos		Mos: □ 9M	los □ 9.5 Mos □ 10 M	ios □ 12 Mo	15	
7. <u>OR</u> App't.	Dates	Prom / /	To / /			From / /	To / /			
8. RATE OF I During App	PAY p't.Term/Dates	MONTHLY A \$ \$		OURLY	App't. \$	MONTHLY \$	ANNUALLY HO	URLY	App't S	
9. EMP. CAT	TEGORY		lministrative Facu Professional,				Administrative Faculty ve Professional, □ Cl			
10. ACADEM	IIC RANK									
11. REPRESE	ENTATION									
12. CHANGE	CONTRACT	☐ Fixed term ☐ Fixed term no	Yr(s) Renewable; n-renewable			☐ Fixed termYr(s) Renewable; ☐ Fixed term non-renewable ☐ Terminal, One Year Contract Provost Initials				
			PC	OSITION BUDG	ET CHANGE DA	ATA				
		FROM FTE %		то	FTE %	EF	ECTIVE A		MOUNT	
13. INDEX CO	ODE									
14. INDEX CO	ODE									
15. INDEX CO	ODE									
16.	PAY ST	ATUS CHANGE	ΓO: (check all tha	t apply and attach	supporting docur	nents as needed)				
RESIGN []	LWOP	FMLA []	SEARCH & RESCUE []	OTHER[]	FROM Date EFFECTIVE	PAYROLL USE ONLY: Benefit Change: TO: Bligible []				
[]	TERMINAPE [//	EDUCATION LEAVE []	MILITARY []	JURY DUTY	TO Date EFFECTIVE	TO: Not Eligible [] EFFECTIVE / Benefit Initials				
COMMENTS	Sary Karn	has a hea	144 1550	e that	prevents	him fro	m finishi	ing the		
_				A DDD	OMITE					
17 PEOLIEST	TED BY: DEPAR	TMENT V.	04	APPR	OVALS			D. I MID.		
		· a	1000	10				DATE: //-3-/0		
18. AUTHORIZED BY DEAN/DIR: 19. APPROVED BY HUMAN RESOURCES: DATE: 11-4-10									1.4.10	
20 APPROVED BY BUILDEED.										
	ED VICE PRESI		C	Drigg 5				DATE: //-/0-/2		
	ED PROVOST:*	grulle.		date / 4/10/10	APPROVED P	RESIDENT**		DATES	date	
		LUS BENEFITS A	1. 1.	FFICES. *For a		ns (all campus) ; c	only unclassified position	ons in Acade	date mic Affairs	
REVISED: J	anuary 30, 19	99 - See rever	se side for ins							

SOU confirming that I was not fired and that I was not a student teaching assistant (TA):



March 9, 2018

Dear Gary Wilson,

Per your request, this letter shall serve as an employment verification. You were employed at Southern Oregon University as an Adjunct Instructor in the Biology Department effective October 1, 2005 to December 31, 2005. You also were employed as an Adjunct Instructor in the Biology Department effective October 1, 2010 to November 1, 2010. SOU accepted your resignation from employment effective October 31, 2010.

Sincerely,

Human Resources Services

SOU confirming that Nicole Prause was the only person to request my records:

Mr. Wilson,

The only public records request we have received in the past three years seeking your personnel records was submitted by Nicole Prause. On February 6, 2018, she submitted a request for your "past or current student status, such as it is permitted by FERPA, including [your] degree completion [and your] Employment history with Southern Oregon University." In accordance with the public records law, we provided redacted copies of documents regarding your employment history only. If you wish to request a copy of the documents as they were provided to Ms. Prause, you will need to submit a public records request (https://inside.sou.edu/home/public-record-requests.html).

Regards, Kathy

Kathy Park
Administrative Assistant
Southern Oregon University
Offices of the University Board Secretary
and the General Counsel

Exhibit P

Prause obtained my redacted SOU employment records and posted a libelous article on Quora falsely stating that I had been fired from Southern Oregon University. Screenshots of Prause Quora post: https://www.quora.com/What-do-you-think-about-your-brain-on-porn-movement/answer/Nicole-Prause









Q Search Quora

What do you think about your brain on porn movement?



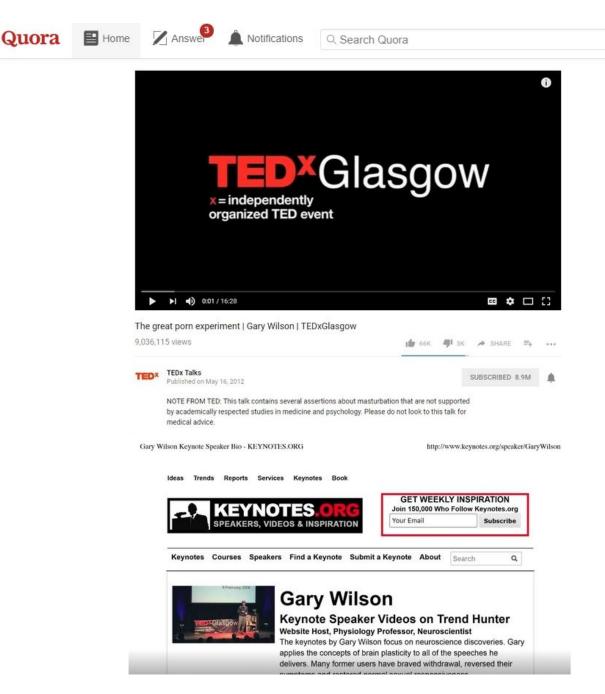
Nicole Prause, worked at University of California, Los Angeles

Answered Sat · Upvoted by Garion Hall, Owns leading porn site abbywinters.com, since 2000.

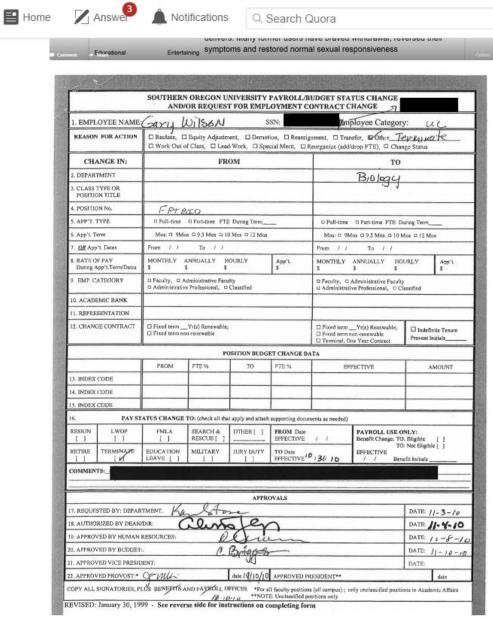
YourBrainOnPorn is run by someone with no scientific training with many warnings online that his science is fake. The author claims to have been a "professor in Biology". In reality, he was supposed to be an undergrad instructor, not a professor, for a lab section at Southern Oregon University. He was fired without pay immediately before completing even a quarter (attached). Further, his TEDx talk carries a fraud warning (attached). He is an employee of the anti-pornography organization The Reward Foundation (attached), which is where the proceeds of his book sales go (his website claims "donated to charity", but it directly profits him).

The website is simply an attempt to profit from the worries of men (attached ad) that have existed for decades and does not reflect consensus by actual sexual neuroscientists (Data do not support sex as addictive (2)). This movement has been documented by scientists to promote misogyny, such as encouraging men to use women without their consent to "test" their erections (2).

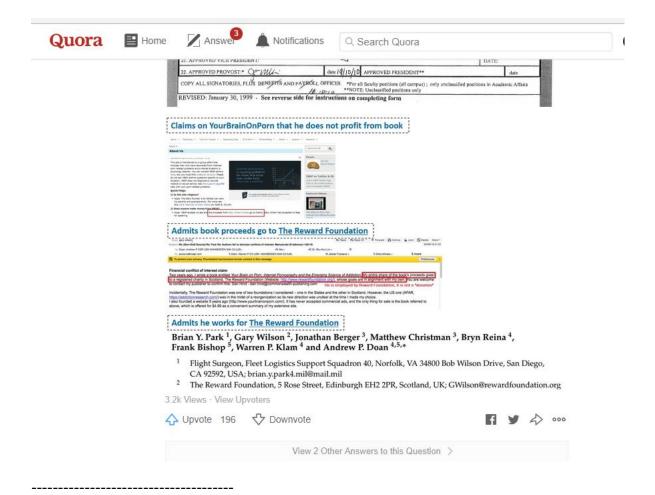
One way to sell products is to create fear, and that is clearly what that person is attempting to do. Don't fall for it.



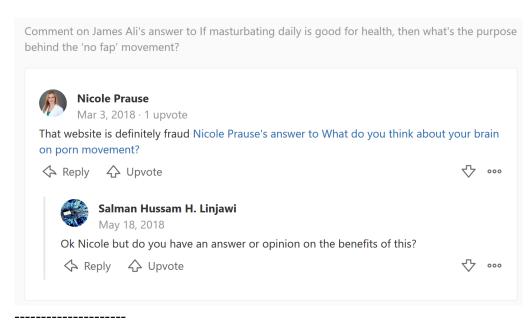
Quora



p------



On March 3rd 2018, Nicole Prause posted a defamatory article on Quora. Over the next few days Prause posted ten more demeaning and untruthful comments about me and my work, all containing a link to her defamatory piece containing my redacted employment records:



Comment on Gwen Sawchuk's answer to Is it normal if my boyfriend doesn't look at me when I'm naked but watches hot girls on Instagram all the time?



Nicole Prause

Mar 3, 2018

Your Brain On Porn ☑ is definitely fraud Nicole Prause's answer to What do you think about your brain on porn movement?









Gwen Sawchuk

Original Author · Mar 3, 2018

And yet millions of men are troubled by their porn use in a variety of ways







Comment on James Ali's answer to How it will affect my future if I masturbate every day?



Nicole Prause

Mar 4, 2018

It is definitely not peer-reviewed science Nicole Prause's answer to What do you think about your brain on porn movement?







Comment on Tanner Edmonds's answer to Why is porn so addictive?



Nicole Prause

Mar 4, 2018

That book was written by an activist with zero science training known to intentionally lie about his credentials and "science" Nicole Prause's answer to What do you think about your brain on porn movement?





000

Comment on Michael Wells's answer to If you've told your spouse over and over that you aren't happy with the level of physical contact you're getting, and things don't improve, could you be blamed for having an affair? What else can you do?



Nicole Prause

Mar 4, 2018

Wow, no, those resources are well-known frauds and very anti-woman Nicole Prause's answer to What do you think about your brain on porn movement?





Reply & Upvote



Comment on Anonymous's answer to How can I concentrate on my Passion while I am addicted to Sex/Masturbation?



Nicole Prause, worked at University of California, Los Angeles

That TEDx was marked for fraud! Nicole Prause's answer to What do you think about your brain on porn movement?



⟨ Reply





000

Comment on James Hinds's answer to A girl will accept my proposal if I stop watching porn..should I do that? Well, porn is not a bad thing ...



Nicole Prause

Mar 4, 2018

Actually, that website is a pretty bad thing Nicole Prause's answer to What do you think about your brain on porn movement?



Reply





Comment on Roy Pavel Drakov's answer to Why can't I stop watching porn?



Nicole Prause

Mar 4, 2018

That might be the worst resource on the web. The guy who writes it is a known fraud: Nicole Prause's answer to What do you think about your brain on porn movement?





Comment on Andrei Rocnea's answer to Habits: What are good ways to keep yourself from wanking?



Nicole Prause

Mar 4, 2018

That website is run by a huckster, it might be the worst resource on the entire web on the topic: Nicole Prause's answer to What do you think about your brain on porn movement?







How legitimate is 'yourbrainonporn'? Is PIED really a thing?



Answer













2 Answers



Nicole Prause, worked at University of California, Los Angeles Answered Mar 5, 2018



It is not legitimate (Nicole Prause's answer to What do you think about your brain on porn movement?). Porn-induced erectile dysfunction is reported by men who have been told that is what happened to them by websites promoting their life coaches. Three studies have examined these men in the lab and find no evidence that sex film viewing is associated with erectile functioning. If anything, those who view more sex films tend to feel more aroused even to pretty tame content

I reported Prause to Quora for violation of terms of service and harassment.



Roger (Quora)

Mar 9, 11:26 AM PST

Dear Gary,

Thank you for your note. The image of the file identified in your complaint has been removed from the following page for violation of our terms of service:

https://www.quora.com/What-do-you-think-about-your-brain-on-porn-movement /answer/Nicole-Prause

Regards,

Roger

User Operations

Quora

As a result, Quora permanently banned Nicole Prause for harassing me:









Notifications

Q

This account has been banned. Learn more about Quora's Terms of Service.



Nicole Prause

PhD Neuroscience/statistician studies human sexual behaviors

2+ Follow 4.1k

Turn On Notifications Ask Question

Feeds

175 Edits

Answers 66

User status changed by Quora Moderation.

Questions 0

Quora Moderation banned Nicole Prause from Quora

Exhibit Q

Dr. Prause defamed me to the organizers of the 2018 European Society for Sexual Medicine/International Society for Sexual Medicine conference, causing the ESSM to cancel my keynote address.

In the fall of 2017, the Scientific Chairs of the World Meeting on Sexual Medicine, organized by the International Society for Sexual Medicine (ISSM) and the European Society for Sexual Medicine (ESSM), invited me to give a keynote address at their <u>combined conference in Lisbon</u>, Portugal.



ESSM BOARD OF DIRECTORS

President

François Giuliano, France

President Elect

Yacov Reisman, The Netherlands

Secretary General

Juan Ignacio Martinez Salamanca, Spain

Treasurer

Carlo Bettocchi, Italy

Chairman of the Scientific Committee

Maarten Albersen, Belgium

Chairman of the Educational Committee

Mikkel Fode, Denmark

International and Public Relations Officer

Hartmut Porst, Germany

Executive Committee Members

Marieke Dewitte, The Netherlands Antoine Faix, France Geoff Hackett, United Kingdom Lior Lowenstein, Israel Augusto José Pepe Cardoso, Portugal Salvatore Sansalone, Italy

Salvatore Sansalone, Italy Arik Shechter, Israel Dear Gary Wilson,

On behalf of Dr. Maarten Albersen and Dr. Wayne Hellstrom, Scientific Chairs of the World Meeting on Sexual Medicine, organized by the International Society for Sexual Medicine (ISSM) and the European Society for Sexual Medicine (ESSM), I would like to invite you participate as a speaker and/or moderator in this meeting.

Please read the following information carefully as it contains important details about your participation.

Presentation Information

You are scheduled to participate in the session(s) listed below:

Your role (speaker or moderator): Speaker

Name session: Keynote lecture

Your presentation/lecture topic: The great porn experiment

Date: Thursday, March 1, 2018

Start / end time session (preliminary): 10:30 am - 11:00 am Minutes for presentation (including Q&A): 30 minutes

Screenshot of the keynote lecture as it originally appeared (before Prause lied to ISSM, which resulted in my talk's cancellation): https://issmessm2018.org/

10:30 a.m. - 11:00 a.m.

Keynote lecture

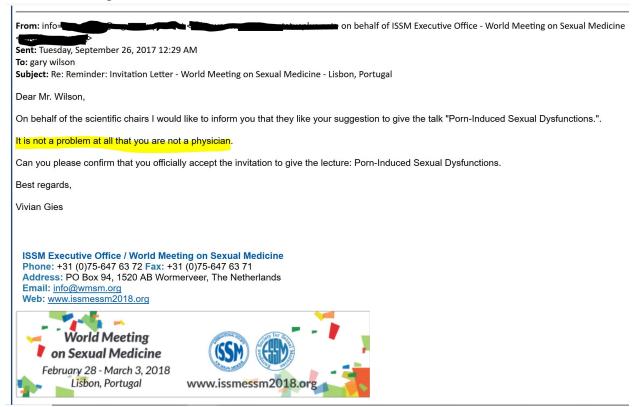
Moderators: Kwangsung Park (Korea) & Guy Tsjoen (Belgium)

10:30 a.m. - 11:00 a.m.

Porn-induced sexual dysfunctions

Gary Wilson (USA)

In relation to Prause's assertions about the committee discovering my true background, it's important to point out that I had initially informed the organizing committee that I *did not have a PhD or MD*. The committee assured me this was not a problem, and insisted I present. Here's the email confirming this account:



My keynote address was mysteriously canceled on January 12, 2018 ("due to program issues"):

ISSM Executive Office - World Meeting on Sexual Medicine < www.org>
Fri 1/12/2018 6:07 AM



Dear Gary Wilson,

Following our most recent communications about your invited presentation at the World Meeting on Sexual Medicine, organized by the International Society for Sexual Medicine (ISSM) and the European Society for Sexual Medicine (ESSM), we regret to inform you that unfortunately we have to withdraw the invitation to present due to program issues which led to cancelling your session on March 1st. We truly apologize for this and any inconvenience it may cause you. On behalf of the organization, we express our sincere gratitude for your support and understanding.

Yours sincerely, Vivian Gies

In social media postings, and her motion to dismiss in the Hilton defamation suit, Prause falsely stated that I was "ejected from the ISSM conference". I was thoroughly compensated for the "program-issues" cancellation. In fact, the ISSM went beyond the usual compensation and paid for plane flights and hotel for both my wife and me. Countering Prause's lie that I was "ejected from the conference," even after the canceled talk, I was invited to attend the conference, free of charge (and asked if I wanted a room in the conference hotel):

From: info=wmsm.org@mg.statusplus.net <info=wmsm.org@mg.statusplus.net> on behalf of ISSM Executive Office - World Meeting on Sexual Medicine < wmsm.org>
Sent: Monday, January 15, 2018 1:02 AM

To: gary wilson
Cc:

Subject: Re: Reminder: Invitation Letter - World Meeting on Sexual Medicine - Lisbon, Portugal

Dear Gary Wilson,

Thank you very much for your reply, but unfortunately I have to inform you that we will not reinstate the session.

I fully understand that you already booked your flights and hotel, therefore we would like to offer you reimbursement of your flight, coverage of your hotel and we are happy to welcome you at the meeting and still offer you free registration for the meeting.

Best regards,

Vivian Gies

ISSM Executive Office / World Meeting on Sexual Medicine Phone: +31 (0)75-647 63 72 Fax: +31 (0)75-647 63 71 Address: PO Box 94, 1520 AB Wormerveer, The Netherlands

Email: <u>info@wmsm.org</u>
Web: <u>www.issmessm2018.org</u>



David Ley Nikky Prause good idea. Wonder if it's good old gw?

Like - 1h



David Ley David Hersh awwww.

Like - 1h



Nikky Prause David Ley We know he just got removed for an actual good reason from a conference...he might be out for blood. He posted like more than 100 times in Quora in the last month. He is losing his sh*t.

Like 1h





David Ley Nikky Prause certainly we can't diagnose from a distance, but three little letters called O. C. D. Keep coming to mind.

Like - 58m



Nikky Prause David Ley He has a few posts online that say he was depressed and had "an addiction", so assuming some mental struggles seems very reasonable. Since his partner appears similarly impaired, there is unlikely any space for reflection.

Like 51m







Replying to @NatRevUrol

These are entirely falsified data that were removed from the program for fraud back in 2018 #ESSM19 I will provide documentation. This has been excluded after review from every national & international dx for lacking this evidence.

4:12 PM - 16 Feb 2019



Replying to @AliceDreger

It is fascinating that these always involve deep state-type conspiracies. Like having any history of "sex" in scholarship opens secret politico cabals. We have had to no-platform people for presenting fake credentials, then listen to "conspiracy" cries too.





Replying to @fluidlyspeaking @DrDavidLey and 4 others

Yep, he's been trying to sneak in science conferences using false credentials too. It's in-person stalking, beyond 5 years of cyberstalking. LAPD & FBI aware. We know he has fake Twitter accounts & booted faking accounts on other platforms to stalk too...right after I had joined.



8:24 PM - 11 Mar 2019

Exhibit R

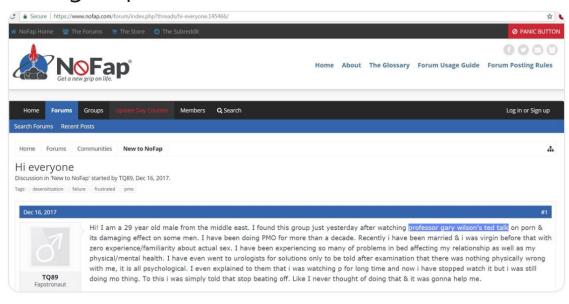
Prause claims to have reported Gary Wilson multiple times to the FBI



Replying to @NicoleRPrause @NoFap @DrDavidLey

The guy with multiple police and FBI reports for stalking me is promoted as a "professor" on your website, when he holds no college degree.

NoFap is promoting misogyny. NoFap is a hate group.



M

12:23 PM - 28 Oct 2018



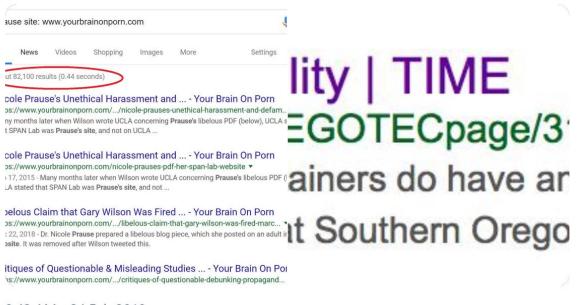






Replying to @LailaMickelwait @lolk101 and 2 others

You are promoting stalking women. Wilson has multiple police and FBI reports for stalking me & followers send rape threats. His obsession has my name on his website 82,000 times & he lies telling ppl he is a "professor" w no college degree. Really "terminated". Find another fraud.

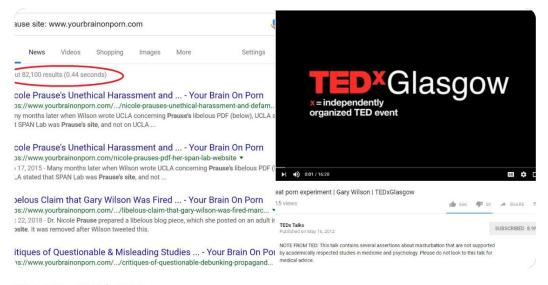


9:42 AM - 24 Feb 2019



Replying to @LailaMickelwait

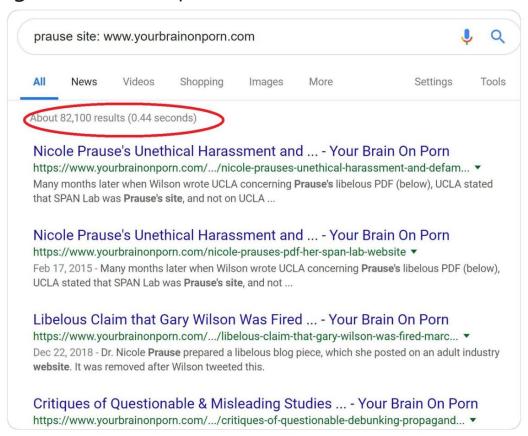
You are promoting stalking & sexual harassment. Gary Wilson has multiple police & FBI reports for stalking me, has my name on his website over 82,000 times, & warnings his "science" is fake. He just told a reporter I am in porn myself.I am a PhD neuroscientist.Find another fraud.

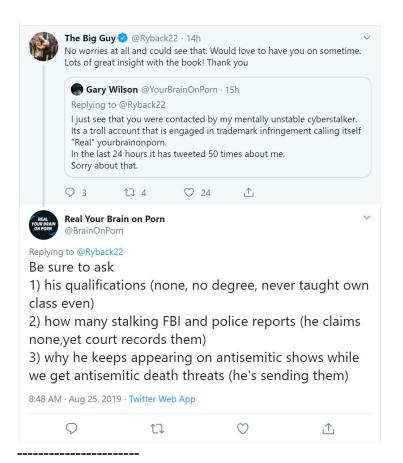




Replying to @parallaxoptics @primalpoly @TGSyndrome

Less so for the stalking reports I had to file with UCLA PD, LAPD and FBI. He's not exactly...balanced...in his "reasoning". I do think someone who repeatedly tells ppl you are in porn & whose followers threaten to rape you has dq'd himself, in addition to the ignorance of topic.







Prause on FTND Facebook page.



Prause comment on ICD-11

As Ms. Sprout has made clear by solely referring to the website of the paid anti-porn activist, there are extensive efforts to silence science that challenges the profits of those posting. Of course, every single claim I can easily refute, which is why there has never been any actual challenge, legally or ethically, addressing any of these issues. Anyone is welcome to review the FBI, UCLA PD and LAPD files, in addition to the legal documents, on Gary Wilson to clarify these fabrications. Supporting cyberstalking of scientists with whom you disagree (my name appears on that website 3,432 times) suggests poor clinical judgment. This has been well-covered by a Pulitzer-winning investigative journalist who found Wilson to be fabricating these issues, as well as other national media (https://www.thedailybeast.com/doesmasturbating-make-you-a-sex-addict-what-about-porn-what-about-bondage-even-the-experts-cant-agree, https://www.reuters.com /article/us-usa-cybersecurity-socialmedia/your-money-cyber-bullying-delivers-a-punch-to-consumer-wallets-idUSKCN0XP1WD, etc.).

I appreciate that Ms. Sprout identifies herself as both in recovery and profiting from treating patients she calls "addicts", selling books, etc. Unfortunately, those in recovery have been demonstrated to over-identify others as addicts when they actually are not (https://www.tandfonline.com/doi/abs/10.1300/J020v18n02_05). Of course, she also is under continued investigation for making these exact false claims by the Washington Board, including now posting this false information.

It is worth noting that the original poster, whose point has been somewhat lost here, continues to enjoy support of the existing data on causality. Sex film viewing has never been shown to cause sexual dysfunctions. In fact, in some experimental studies, the opposite has been demonstrated. In the only representative survey (of the Dutch), more sex film viewing is associated with lower sexual dysfunction, including erectile dysfunction (https://www.rutgers.nl/sites/rutgersnl/files/PDF-Onderzoek/Seksuele_Gezondheid_in_NL_2017_23012018.pdf).

The proposed diagnosis has never been field-tested, and has been used to replace "homosexuality" as a diagnosis. With these and forthcoming data, adding a diagnosis with no random-assignment, controlled treatments directly harms patients. They had over 40 years (conservatively) to test treatments if they were serious about helping patients, not just increasing profit.

Nicole Prause 2018-Jun-08 - 18:16 UTC











November, 2018: I file a FOIA request with the FBI with the FBI to find out if Nicole Prause had ever filed a report naming me. She had not.

From: efoia@subscriptions.fbi.gov <efoia@subscriptions.fbi.gov< th=""></efoia@subscriptions.fbi.gov<>
Sent: Tuesday, October 30, 2018 5:03 PM
To:@hotmail.com
Subject: eFOIA Request Received

Individu

Individual Inform	mation
Prefix	Mr.
First Name	Gary
Middle Name	
Last Name	Wilson
Suffix	
Email	@hotmail.com
Phone	
Location	United States
Location	Office States
Domestic Addre	SS
Address Line 1	Drive
Address Line 2	
City	
State	Oregon
Postal	
Agreement to Pa	ay
How you will pay	I am willing to pay additional fees and will enter the maximum amount I am willing to pay in the box below.
Allow up to \$	

Privacy Act	
US Citizen	True
Duefix	No.
Prefix	IVII.
First Name	Gary
Middle Name	
Last Name	Wilson
Suffix	
Date of Birth	
Place of Birth	
Additional Information	I have been the victim of cyber-stalking by Los Angeles resident Nicole R
, taanana, maninininin	Prause. Nicole Prause has claimed multiple times on social media, and to journalists, that she filed an FBI report on me. I want to know if anyone has filed an FBI report on me. If Prause did file a report, whatever assertions she put forth in the report are patently false.

Letter from FBI confirming that Prause never filed an FBI report on Gary Wilson:

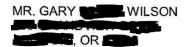


U.S. Department of Justice

Federal Bureau of Investigation

Washington, D.C. 20535

November 2, 2018



FOIPA Request No.: 1421007-000 Subject: WILSON, GARY

Dear Mr. Wilson:

This is in response to your Freedom of Information/Privacy Acts (FOIPA) request. The FBI has completed its search for records responsive to your request. Below you will also find informational paragraphs relevant to your request. Please read each item carefully.

Based on the information you provided, we conducted a search of the Central Records System. We were unable to identify any main file records responsive to your request and; therefore, your request is being administratively closed. If you have additional information pertaining to the subject of your request, please submit a new request providing us with such details, and we will conduct an additional search.

Exhibit S

Dr. Prause placed a PDF on AmazonAWS with screenshots of emails involving Washington University PD Patrolman Tim Dennis (St. Louis) warning him falsely that I intended to stalk Dr. Prause at the St. Louis AASECT conference.

. PD				_			
	met with WUSTL PD						
61			Tue, Aug 9, 2016 at 4:5	7 P			
	370						
y from 1 PM-3:3	0 PM. Her presen						
not want to activ							
or you to call WU	PD and deal with	this for us and I ap	preciate your help.				
and see he is the	e author of Your b	orain on porn and is	s in a cyber debate with Nicole a	ind			
	a copy of our 4-di- the department way from 1 PM-3:30 and Ineffective Tre eports to his Chie not want to active for you to call WU and see he is the	a copy of our 4-day program, Nikky the department would have some p ty from 1 PM-3:30 PM. Her presen ing Ineffective Treatments". Exports to his Chief and others, he s not want to activate our other partic. For you to call WUPD and deal with and see he is the author of Your te	a copy of our 4-day program, Nikky's emails and phor the department would have some plainclothes detecting from 1 PM-3:30 PM. Her presentation is "How Scieng Ineffective Treatments". Seports to his Chief and others, he said someone with a not want to activate our other participants, so whatever. For you to call WUPD and deal with this for us and I appear and see he is the author of Your brain on porn and is	eports to his Chief and others, he said someone with a higher rank than his would not want to activate our other participants, so whatever we can do to be subtle while r. or you to call WUPD and deal with this for us and I appreciate your help. and see he is the author of Your brain on porn and is in a cyber debate with Nicole a			

Best,

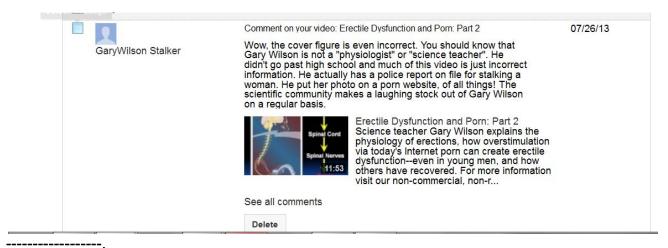


Susan Stiritz

Exhibit T

Dr. Prause used numerous aliases, social media accounts, and ultimately her own email accounts and an Amazon website, to falsely claim that she had reported me to the LADP and UCLA PD for stalking.

While still at UCLA Dr. Prause employed aliases to post her claims.





Comment on your video: Things You Didn't Know About Porn - Part 1

Gary Wilson is a complete fraud, I hope no one is actually showing their children this garbage. He is a part time massage therapist living in Ashland, OR, hardly the "physiologist", his favorite fake title. I would keep your kids away too, because he has a police report for stalking some poor woman. I heard he put her photo on a PORN website! Of all things, that is exactly the



kind of bullying we are trying to stop with kids!

Things You Didn't Know About Porn - Part 1
The target audience for this video series is
10-11 year old boys. Science based videos for
an older audience can be found on our YouTube
channel. For more information visit our
non-commercial, non-religious website www.yourbrainonporn.com

07/26/13



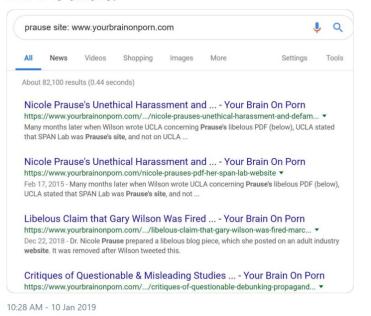
Follow



Replying to @GaveUpPorn @ConnerHabib @UtahGov

Liberos

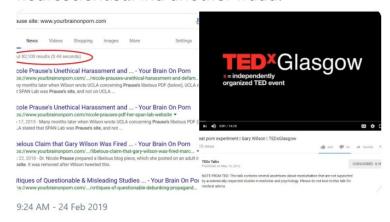
Yes, I have been cyberstalked by that individual, with over 80,000 mentions of my name on his website and multiple FBI and police reports. You are continuing to promote harassment, misogyny, and cyberstalking. LAPD is aware.





Replying to @LailaMickelwait

You are promoting stalking & sexual harassment. Gary Wilson has multiple police & FBI reports for stalking me, has my name on his website over 82,000 times, & warnings his "science" is fake. He just told a reporter I am in porn myself.I am a PhD neuroscientist.Find another fraud.



2

Nicole Prause, PhD November 10, 2016 at 9:34 pm

This is a copy+paste from http://www.yourbrainonporn.com

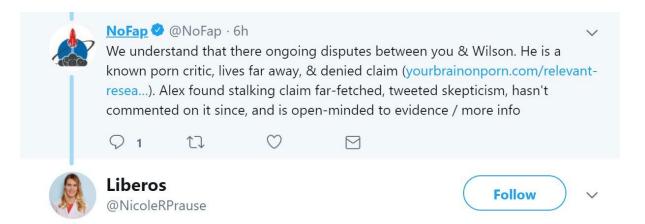
The author, Gary Wilson, is a stalker who has written my name on his website over 1,500 times. He pastes this in literally all media that appear online about my research. He has multiple no-contact and cease and desist orders, most recently for stalking. That is why this poster uses no name, he is legally prohibited from doing what he did right here.

Here is my talk about his stalking and having to shut down my lab after he stole and posted personal photos of me on his website and threatened my staff:

http://poptech.org/popcasts/finding liberos

This is the level these people operate.

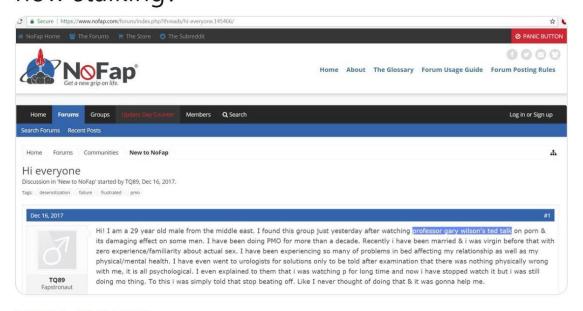
Reply



Replying to @NoFap @DrDavidLey

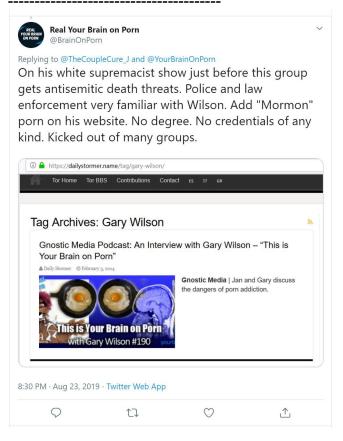
Person your website falsely claims has a PhD has no degree, multiple police reports for stalking, & his only no-data paper recommended for retraction by 3rd party review:

retractionwatch.com/2018/06/13/jou ... LAPD did not find it lacking. This anon account keeps promoting misog, now stalking?



In the last year Dr. Prause has used her alias twitter account (@BrainOnPorn)







Real Your Brain on Porn @BrainOnPorn · 3h

The fraud by those extremists is well-documented: twitter.com/BrainOnPorn/st...

They have no statements from WHO, nor will anyone from WHO speak to them because they threaten scientists.

We have extensive documentation confirming addiction was not added: realyourbrainonporn.com/history



Real Your Brain on Porn @BrainOnPorn . 5h

Porn viewing has never been shown to cause brain damage. Ever.

This is how that fraud is perpetuated by activists in editorials. ncbi.nlm.nih.gov/pmc/articles/P...

was unclear to us, and perhaps som v Hilton and Watts elected to referen reased △FosB in the nucleus accuml oratory rats. These hypersexual ra relational sexual activities with fen rather than evaluat autoeroticism in response to se nuli. Although the rodent study i

Hilton and Watts from the studies the for the various resu

addictions. Although we believe these paubsequently, any release of dopamine of scientific inquiry, Hilton and Watts egions in response to pornography expos any, convincing evidence to support the be due to the novelty of the pornograp Instead, excessive liberties and misleadin vould likely occur for individuals naïve of neuroscience research are used to asset as well as seasoned consumers of si pornography consumption causes brain cardless, it does not provide readers with to clarify what the research actually do excessive pornography use is an addicseveral accompanying illustrations.



Real Your Brain on Porn @BrainOnPorn · 3h

17

This is how stalking works ^ . That unhinged extremist has been blocked since the start of this account, sued us (lost), was told to stop harassing us by @ACLU and @SASH1234, yet responds within minutes of anything we post. Then we get death threats.

Wilson belongs in jail.

1

₾



Liberos

@NicoleRPrause

Replying to @BrainOnPorn @justmelby and 6 others

Police already served subpoena. Two more expected shortly. It appears likely in 2020. And about time.

12:20 PM · Dec 31, 2019 · Twitter Web App

EXHIBIT U

Prause as Janey Wilson. Prause reported the charity to the Scottish Charity Regulator, falsely claiming financial fraud involving the charity personnel and myself.

On Sat, Mar 21, 2015 at 6:17 AM, Janey Wilson < ianeywilson68@gmail.com > wrote:

Hi,

I saw the proceeds from this book are all going to research. Which organization is benefiting? I would like to see if I can list it on my taxes as a deduction.

On Mon, Mar 23, 2015 at 4:42 AM, Dan Hind thereturnofthepublic@gmail.com wrote:

Dear Ms Wilson,

The author's income supports the Reward Foundation, a registered charity in the UK.

http://www.rewardfoundation.org/

Yours sincerely,

Dan Hind

On Tue, Mar 24, 2015 at 7:15 AM, Janey Wilson < ianeywilson68@gmail.com > wrote:

Dear Dan Hind,

Thank you for the information. I would not normally check, but I'm glad I did. That organization actually is not registered in the UK: http://apps.charitycommission.gov.uk/Showcharity/RegisterOfCharities/registerhomepage.aspx

This is the government registry, so I am not sure where else it could be. You might want to alert your author that they might be contributing to a scam. I cannot buy based on this, and I don't think anyone else should either.

J

From: Dan Hind < thereturnofthepublic@gmail.com >

Date: Tue, Mar 24, 2015 at 9:33 AM

Subject: Re: Wilson text

To: Janey Wilson < ianeywilson68@gmail.com>

The Charity Commission is a register of charities in England and Wales. The Reward Foundation is registered in Scotland.

Here is its listing on the Scottish Charity Register -

https://www.oscr.org.uk//charities/search-scottish-charity-register/charity-details?charitynumber=sc044948

In the UK many responsibilities are devolved to the Scottish Parliament, including the registration of charities, it seems.

I hope this clears up any confusion,

Yours sincerely, Dan Hind

On 25 March 2015 at 04:09, Janey Wilson < janeywilson68@gmail.com > wrote: Dear Mohammad Abushaaban,

I write out of concern for The Reward Foundation housed at The Melting Pot, which is posing as a nonprofit. In 2012, Mary Sharpe was responsible for selecting TEDX speakers in Glasgow. She made the extremely odd decision to have a massage therapist with no neuroscience background, Gary Wilson, rave about the neuroscience of "porn addiction". The talk was so poor it is currently under investigation for its pseudoscience by TEDX. Now, Mr. Wilson appears to be paying Mary Sharpe for this opportunity.

Specifically, he is selling a book and all the proceeds of the book are said to be going to The Reward Foundation for "research":

www.therewardfoundation.org

Yet, Mary Sharpe is not a researcher, has no neuroscience background, and the charity lists no way for any real scientist to apply for these funds. The money appears to be going directly in to her pocket, likely in exchange for her earlier TEDX favor. The charity further has chosen not to openly provide links to their financials.

I have filed this complaint with the Scottish Charity Register as well. I suggest you consider investigating how else Ms. Sharpe might be using pseudo-science to fleece concerned individuals. That hardly seems in line with any of the aspirational goals listed on the Melting Pot website.

On Mon, Mar 30, 2015 at 2:07 AM, Mohammad Abushaaban

<mohammad@themeltingpotedinburgh.org.uk> wrote:

Hi Janey

Hope you are well and thanks for your email.

I am slightly concerned about this but would like to find out more about you:

- Your job title
- How do you know Mary & Reward Foundation (what is your relationship with her)
- Telephone number & physical address

Would appreciate if you can provide this information so I can take things forward.

Thank you.

Mohammad Abushaaban, Business Coordinator

FREE trial of our Coworking Space every 2nd Tuesday and last Thursday of the month.



Dynamic resources for social change makers 5 Rose Street, Edinburgh, EH2 follow 2PR

us on

Tel: +44 (0)131 243 2626/3

The Melting Pot_www.TheMeltingPotEdinburgh.org.uk inspiration at work Company No: SC291663

Case 2:19-cv-01366-MPK Document 20-11 Filed 01/24/20 Page 107 of 123

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

From: Janey Wilson < janeywilson68@gmail.com>

Date: 31 March 2015 at 17:08

Subject: Re: Concern about for-profit posing as non-profit at Melting Pot To: Mohammad Abushaaban < mohammad@themeltingpotedinburgh.org.uk>

Dear Mohammad Abushaaban,

I had no previous knowledge of Mary or the Reward Foundation. I became aware of them because Gary Wilson was selling a book for which he claimed "all proceeds" were being donated to research sex addiction. As that person is known for attacking scientists, that seemed very unlikely. I asked the publisher and he indicated the money was being given to the Reward Foundation. Since there was no research occurring or grants planned, and Mary is not trained for such work, I naturally became suspicious. When I saw she selected speakers for the Glasgow TEDX it all made sense. Gary Wilson spoke about the "neuroscience" of sex addiction in that TEDX, a talk currently under investigation for fraud. No one knew why a massage therapist with no college degree had been invited to give such a talk. This money trail made the reason very clear.

If you can clarify why my position title and identifying information are needed to complete an inquiry, I would provide it. As it is, I do not want to become the next target for harassment that these people are known for.

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

From: Janey Wilson < janeywilson68@gmail.com>

Date: 31 March 2015 at 17:08

Subject: Re: Concern about for-profit posing as non-profit at Melting Pot To: Mohammad Abushaaban < mohammad@themeltingpotedinburgh.org.uk>

Dear Mohammad Abushaaban,

I had no previous knowledge of Mary or the Reward Foundation. I became aware of them because Gary Wilson was selling a book for which he claimed "all proceeds" were being donated to research sex addiction. As that person is known for attacking scientists, that seemed very unlikely. I asked the publisher and he indicated the money was being given to the Reward Foundation. Since there was no research occurring or grants planned, and Mary is not trained for such work, I naturally became suspicious. When I saw she selected speakers for the Glasgow TEDX it all made sense. Gary Wilson spoke about the "neuroscience" of sex addiction in that TEDX, a talk currently under investigation for fraud. No one knew why a massage therapist with no college degree had been invited to give such a talk. This money trail made the reason very clear.

If you can clarify why my position title and identifying information are needed to complete an inquiry, I would provide it. As it is, I do not want to become the next target for harassment that these people are known for.

On Wed, Apr 8, 2015 at 3:13 AM, Mohammad Abushaaban

<mohammad@themeltingpotedinburgh.org.uk> wrote:

Dear Janey

Please know that I appreciate your concern about this matter. However the allegations you are making against one of our members are extremely serious, in fact defamatory, if untrue. Who is undertaking the fraud investigation? How do you know this? Given the legal consequences of these accusations, I need to verify who you are so that I can contact you directly to find out more and establish that you are not just an internet troll with a personal grudge.

For instance, on what basis do you consider the science our member is relying on is "pseudo-science"? To answer this you will appreciate it would be useful to have your professional credentials. I'd be grateful if you would send me a landline telephone number so that I can call you directly and a postal address for any written mail, as the generic 'gmail' address means you might be anyone, from anywhere in the world.

Without your cooperation in this matter to establish your good faith, I am afraid that I am unwilling to investigate the matter any further.

Thank you.

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

From: Janey Wilson < janeywilson68@gmail.com>

Date: 8 April 2015 at 17:47

Subject: Re: Concern about for-profit posing as non-profit at Melting Pot To: Mohammad Abushaaban < mohammad@themeltingpotedinburgh.org.uk>

Dear Mohammad.

This is why whistleblower protections exist. I would think you would be more concerned about the fraud, as it would affect the perceived legitimacy of your organization. All of the necessary information can be provided in public documentation. Surely, you can understand my hesitancy to open myself to attack by a group that I feel already is engaging in criminal activities. If you are aware of a whistelblower organization that would verify my identity while protecting it, I would be open to do that.

For example, Newsweek recently published an article about the pseudo-science of Gary Wilson: http://www.newsweek.com/porn-ruining-mens-sex-lives-319432

There currently are two organizations investigating fraud.

One is TEDX, because Gary Wilson provided false titles (he is a part-time massage therapist with no university degree) and misrepresented scientific findings in his TEDX talk the same as he does on his website. I can provide a case number if that would be useful.

The other is the Scottish Charity Regulator (reference MI/INQ/15-1065) for Mary Sharpe's role in receiving funds from someone she provided a position at TEDX.

It should give you some information that the Reward Foundation website suddenly now has board members listed (http://www.rewardfoundation.org/who-we-are.html), where none existed last week. In fact, one of the board members (Dr. David McCartney) provided a review used to advertise the book (http://www.amazon.com/Your-Brain-Porn-Pornography-Addiction-ebook/dp/B00N2AH8NW) from which the foundation is receiving money.

This next email exposes Janey Wilson as Prause. The submission of *Park et al.*, 2016 to the *Yale Journal of Biology & Medicine* occurred around the time of the following "Janey Wilson" email. *YJBM* was the only place my affiliation with the charity The Reward Foundation (TRF) could be found, as it was nowhere public. Such information was confidential and its use by Prause outside the review process was an ethics violation.

On Wed, Apr 22, 2015 at 9:21 AM, Janey Wilson < janeywilson68@gmail.com > wrote:

I now have documentation that Gary Wilson himself is claiming to be a member of the Reward Foundation. While he is not listed on the new website page (http://www.rewardfoundation.org/who-we-are.html), this represents a rather worse transgression. He claims to "donate" the proceeds of his book to research, which is now going to a charity that has no research plans and of which he is a part. Mary Sharpe may not even be aware he is making these claims, I am not sure, but he has now made them publicly.

"Janey Wilson" emails again in July

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

From: Janey Wilson < janeywilson68@gmail.com>

Date: 6 July 2015 at 04:17

Subject: Re: Concern about for-profit posing as non-profit at Melting Pot To: Mohammad Abushaaban < mohammad@themeltingpotedinburgh.org.uk>

I have now reported this crime to the organization to which he claimed he was a member of the Reward Foundation. He still does not appear on their site and still claims to be donating proceeds from his book to "charity" from which he does not profit. He clearly also is profiting.

The following year, Prause contacts my publisher (and later his web guy) stating she has a previous email from Dan Hind stating that proceeds of my book go to The Reward Foundation. The only such email was to "Janey Wilson," not Prause.

From: Nikky <nicole.prause@gmail.com>

Sent: 03 November 2016 21:27 **To:** Dan Hind; dcehind@hotmail.com

Cc: Dr. Franck Vazquez | CEO | MDPI; Iratxe Puebla; behavsci@mdpi.com; Martyn Rittman; Dr. Shu-Kun Lin; Jim Pfaus

Subject: Re: Book financial beneficiary

Mr. Hind,

We already have a previous email from you verifying that Gary Wilson has sent all the proceeds of his book to the organization he actually is employed by, The Reward Foundation. You may choose not to verify this information for the Committee on Publication Ethics, but the previous email can be supplied to them as well.

Your author failed to disclose his financial conflict of interest in numerous publications now to profit himself while claiming to "donate" the proceeds to the public (and to you). This already is public knowledge that you either can be on record to help expose or profiteer, as you please.

NP

Nicole Prause, Ph.D.

Research: <u>www.span-lab.com</u> Liberos LLC: <u>www.liberoscenter.com</u>

323.919.0783

From: Jamie Kendall <info@jamiekendall.com>

Sent: 04 November 2016 11:32

To: Daniel Hind

Subject: Fwd: Book financial beneficiary

Hi Dan,

Told them I'd forward whatever this is on to you.

Jamie

Jamie Kendall MA (RCA) www.jamiekendall.com

Begin forwarded message:

From: Nikky <nicole.prause@gmail.com>

Subject: Fwd: Book financial beneficiary

Date: 3 November 2016 at 21:31:24 GMT

To: info@jamiekendall.com

Dear Mr. Kendall,

You may wish to encourage the site content owner that you designed to clarify that his author was caught claiming to "donate" proceeds from a book that actually went into his own pocket. Mr. Hind has failed to respond to inquiries with the Committee on Publication Ethics. I assume you would not want your name entangled in fraud like this in any way.

NP

Nicole Prause, Ph.D.

Case 2:19-cv-01366-MPK Document 20-11 Filed 01/24/20 Page 111 of 123

Research: www.span-lab.com Liberos LLC: www.liberoscenter.com 323.919.0783

Exhibit V

Dr. Prause (as Janey Wilson) also reported The Reward Foundation to the Scottish Charity Regulator, falsely claiming financial fraud involving the charity personnel and myself. The Scottish Charity Regulator took no action.

On Wed, Apr 8, 2015 at 9:47 AM, Janey Wilson < <u>janeywilson68@gmail.com</u>> wrote: Dear Mohammad,

This is why whistleblower protections exist. I would think you would be more concerned about the fraud, as it would affect the perceived legitimacy of your organization. All of the necessary information can be provided in public documentation. Surely, you can understand my hesitancy to open myself to attack by a group that I feel already is engaging in criminal activities. If you are aware of a whistelblower organization that would verify my identity while protecting it, I would be open to do that.

For example, Newsweek recently published an article about the pseudo-science of Gary Wilson: http://www.newsweek.com/porn-ruining-mens-sex-lives-319432

There currently are two organizations investigating fraud.

One is TEDX, because Gary Wilson provided false titles (he is a part-time massage therapist with no university degree) and misrepresented scientific findings in his TEDX talk the same as he does on his website. I can provide a case number if that would be useful.

The other is the Scottish Charity Regulator (reference MI/INQ/15-1065) for Mary Sharpe's role in receiving funds from someone she provided a position at TEDX.

It should give you some information that the Reward Foundation website suddenly now has board members listed (http://www.rewardfoundation.org/who-we-are.html), where none existed last week. In fact, one of the board members (Dr. David McCartney) provided a review used to advertise the book (http://www.amazon.com/Your-Brain-Porn-Pornography-Addiction-ebook/dp/B00N2AH8NW) from which the foundation is receiving money.

. I

My publisher later received this anonymous, libelous, threatening email. Highly likely it was Prause.

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

From: Anon Whisteblower <anonwhistleblowerosu@gmail.com>

Date: Wed, May 25, 2016 at 2:28 PM Subject: FTC and BBB complaints To: thereturnofthepublic@gmail.com

Both BBB and FTC complaints have been filed for false advertising for the book "Your Brain on Porn". Gary Wilson is a member of "The Reward Foundation", so none of the monies are being "donated" to "a UK charity" as he claimed (e.g., **yourbrainonporn**.com/your-brain-porn-e-book). He is directly financially benefiting.

In case you were unaware of his direct role, I suggest removing the book (and its false Amazon reviews) before the FTC does. The next complaints will be directed towards a non-responsive publisher that aided the false advertising to consumers. This email makes you aware of false advertising in which the author is involved.

You do not have my consent to forward this email, but I will provide additional details and document

Exhibit W

Dr. Prause falsely claiming that I receive compensation from The Reward Foundation.

May 22, 2018 Prause emails (journal publisher) MDPI officials, falsely stating that I received 9,027 pounds from The Reward Foundation, a registered charity.

On 22/05/2018 20:48, Nicole Prause wrote:
 It appears Wilson did receive money from The Reward Foundation.
 Attached is The Reward Foundation Annual Report. Per item C6
 referring to travel that describes Gary Wilson's travel totaling
 9,027 pounds.
 I request that any correction include this financial COI, or time be
 allotted to properly demonstrate that this was not a financial
 conflict of interest.
 Nicole Prause, Ph.D. Liberos http://www.liberoscenter.com

Two days later, one of Prause's Wikipedia alias (NeuroSex) edits the MDPI page inserting the above claim:

Revision as of 09:24, 24 May 2018 (edit) (undo) (thank)

NeuroSex (talk | contribs)

(→Controversial articles: Added new controversial case example (more citations available if needed,

just ask))

Next edit \rightarrow

Line 50:

> 323.919.0783

=== Controversial articles ===

In 2015, the MDPI journal Behavioral Sciences published a paper "Is Internet Pornography Causing Sexual Dysfunctions? A Review

with Clinical Reports". It was widely promoted during political attempts to define pornography as a public health hazard. However, it was soon discovered that many fraudulent statements appeared in the paper, often claiming the opposite of what a cited study had described and not attempting to consent the cases. The listed paper editor, Scott Lane, denied having served as the editor. The listed journal editor, John Coverdale, also denied he had served as the journal editor during the review time claimed. The paper was not edited between submission and acceptance. Two of the authors subsequently were found to have undisclosed financial conflicts of interest. Specifically, Andrew Doan ran a Christian ministry that has <ref>{{cite web|title=continuously sought donations and speaking fees against pornography|url=http://realbattle.org/donate/}}</ri>
//donate/}}</ri>
//downloadfile.aspx?id=160223&type=5&charityid=SC044948&arid=236451}}</ri>
//ref> The Reward Foundation to lobby in the US on behalf of anti-pornography state declarations. The Committee on Publication Ethics reviewed the case and recommended retraction. The publisher has refused.

Case 2:19-cv-01366-MPK Document 20-11 Filed 01/24/20 Page 115 of 123

On its talk page NeuroSex claims to have private emails from the publisher (MDPI) verifying the preceding edits.

Wikipedia is not an outlet for publishing original research [edit]

See WP:NOT#OR. I believe you about *Is Internet Pornography Causing Sexual Dysfunctions? A Review with Clinical Reports*. However, that's not the way Wikipedia works. If you cannot produce a WP:RS for verifying your claim, it will get deleted. Tgeorgescu (talk) 09:42, 24 May 2018 (UTC)

I have images that verify each of the claims (e.g., email from the publisher, email from the listed editor, etc.).

RetractionWatch and other outlets are considering writing reviews of it as well, but I cannot be sure those will materialize. How is best to provide such evidence that verifies the claims? As embedded image? Written elsewhere with images and linked? — Preceding unsigned comment added by NeuroSex (talk • contribs) 17:03, 24 May 2018 (UTC)

If a WP:RS does not explicitly state what you claim, it has to go. We're simply not a publisher of original research, otherwise unpublished syntheses and so on. Everything that we publish should not be based upon original investigation by a Wikipedia editor, but it has to be cited to a properly published WP:SOURCE. Tgeorgescu (talk) 05:33, 25 May 2018 (UTC)

A few weeks later Prause makes the same false claims on the ICD-11 webpage.

Note "Monte Burris" and "Gary Wilson" are the same person. He is paid by anti-pornography organization The Reward Foundation to lobby against pornography in the USA, including soliciting funding against pornography organizations. Marnia Robinson is his wife. Neither have any research or clinical training or credentials. Last year, Wilson received over 9,027 pounds (about 12,000 USD) for engaging in this activism (section C6 https://www.oscr.org.uk/about-charities/search-the-register/charity-details?number=SC044948#results). All 3 of these users failed to report this conflict of interest to the ICD.

As before, I receive no funding from any pornography organization.

Nicole Prause 2018-Jun-07 - 04:26 UTC**

REPLY AGREE** -1 **SPAM**

As the author of the document referred to in this comment (section C6 https://www.oscr.org.uk/about-charities /search-the-register/charity-details?number=SC044948#results) I would like to entirely refute the claim by Nicole Prause that this documentation is in any way related to funding provided by The Reward Foundation to Gary Wilson. At no point in time has any payment of any money whatsoever been made by The Reward Foundation to Gary Wilson. The payment of 9,027 pounds was made by The Reward Foundation to me to refund me my own money that I had spent on the charity's operations during our set-up period. The payment was authorised by a member of our Board and separately scrutinised by the accountant who acts as the Independent Examiner of our corporate accounts. I have a full paper trail consisting of nearly 250 receipts to support my claim. The claim by Nicole Prause is outrageous and libellous. I request that the moderator take it down immediately.



We now have another The Reward Foundation anti-porn representative posting in the ICD-11 comments, Darryl Mead. Of course, Darryl Mead has no way to know what funding Gary Wilson received, nor does he provide any documentation or external parties to support this. Wilson filed for bankruptcy recently (public records available), has listed no employment since, except for The Reward Foundation, and traveled internationally filing as a representative of The Reward Foundation by his own admission to conference organizers. In addition, he solicited speaking fees (advertisement available), lists himself extensively as a "professor" having never held that title (indeed, no training whatsoever in this area, links to claims available), and has been withdrawn from other conferences for presenting false credentials to the conference organizers. Thank you for the opportunity to update that Mr. Wilson's only supposed peer-reviewed article actually was not peer-reviewed, and Wilson tried to hide his affiliation with the anti-pornography group The Reward Foundation. Luckily, the Committee on Publication Ethics caught him. The article was been corrected once now to show what Wilson tried to hide his affiliation and removed the listed editor, because the paper actually had no editor: http://www.mdpi.com/2076-328X/8/6/55/htm Indeed, Wilson's only paper has been recommended for retraction by independent, third party review due to failing to consent the "cases", if they actually exist: https://retractionwatch.com/2018/06/13/journal-corrects-but-will-not-retract-controversial-paper-on-internet-porn/ in addition to numerous other problems. Wilson has zero credentials, 100% bias, and represents the central problem with the supposed use of the ICD-11 comments section. Nicole Prause 2018-Jun-14 - 04:03 UTC **▼** REPLY ✓ AGREE -1 S DISAGREE SPAM REMOVE The assertion by Nicole Prause that I have no way of knowing if Gary Wilson received funding from The Reward Foundation is simply untrue. As the legally appointed Treasurer of The Reward Foundation (Scottish Charitable Incorporated Organisation SC044948) I am in a unique and clear position to know the truth of this statement. I have legal oversight of all expenditure by The Reward Foundation. There was no expenditure by The Reward Foundation on Gary Wilson. The claim of Nicole Prause that there is no public evidence to support my position is also demonstrably false. In fact, the citation she employed when misattributing my expenses reclaim to Gary Wilson came from our published accounts on the official website of the Office of the Scottish Charity Regulator. The wholly unfounded claims of Nicole Prause about me are libellous and I request that the moderator remove them immediately. Darryl Mead 2018-Jun-14 - 10:18 UTC AGREE DISAGREE SPAM. REMOVE Actually, that is not true. The resource mentioned is here: https://www.oscr.org.uk/about-charities/search-the-register/charity-details?number=SC044948#results and does not show that you received funds. In fact, Wilson (and his wife) registered under The Reward Foundation as their employer for the same international conference by presenting false credentials that you attended. Wilson has no income and recently filed for bankruptcy. Let Wilson disclose his funding source, because recent reviews by an independent third party (and national news outlets) found that he was hiding the nature of The Reward Foundation. Wilson identified, on his own in a publication, The Reward Foundation as his employer (see above). Maybe your "scientific advisor" (who actually has no science training nor degree) should stop fabricating, coercing patients, misrepresenting himself as a professor, intentionally misrepresenting our scientific studies, filing false license complaints, offering his "expert testimony" on this lawsuit (https://dockets.justia.com/docket/tennessee/tnmdce/3:2013cv00607/56117/) claiming: "Gay people were not born gay - they were born as equally broken as the rest of humanity. Gay people are not a class of their own any more than people who have sex

▼ REPLY

✓ AGREE -1 S DISAGREE

SPAM

REMOVE

with animals are. Gay people are essentially sex addicts."

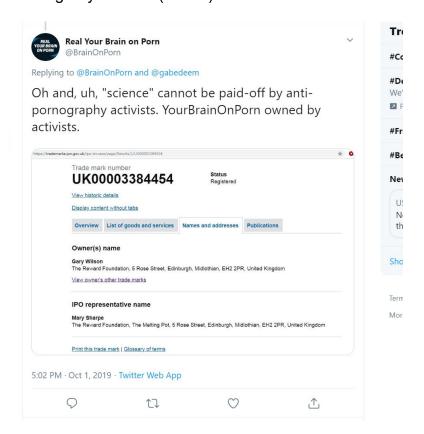
Nicole Prause 2018-Jun-14 - 16:10 UTC

The Reward Foundation should be recognized as a hate group by the Southern Poverty Law Center.

etc.

add new comment

Presumed Prause alias (@BrainOnPorn) misrepresents my UK trademark application as TRF "owning" my website (YBOP).



Another Prause alias posts the same false allegations on Reddit/pornfree:



Exhibit X

Dr. Prause has employed multiple aliases in violation of Wikipedia rules against sockpuppets in order to edit several different Wikipedia pages. Wikipedia identified at least 10 illicit sockpuppet accounts of the Prause Wikipedia alias NeuroSex:

- User:Defender1984
- User:JupiterCrossing
- User:NewsYouCanUse2018
- User:OMer1970
- User:Sciencearousal
- User:ScienceEditor
- User:SecondaryEd2020
- User:Suuperon
- User:204.2.36.29
- User:Baseballreader899



NeuroSex

NeuroSex (talk⁺ · tag · contribs · logs · filter log · block log · CA)

18 March 2019 [edit]

Suspected sockpuppets [edit]

- NewsYouCanUse2018 (talk + · tag · contribs · logs · filter log · block log · CA)
- Baseballreader899 (talk + · tag · contribs · logs · filter log · block log · CA)
- 204.2.36.29 (talk + · tag · contribs · filter log · WHOIS · RBLs · block log · cross-wiki contribs)
- Tools: Editor interaction utility Interaction Timeline User compare report Auto-generated every hour.

Same POV pushing on an already crap article at Fight The New Drug and the IP (obviously not asking for connection) is doing the same at the AFD and talk page, both master account and IP meatsock also seem to share an inability to sign their personal attacks. Praxidicae (talk) 20:19, 18 March 2019 (UTC)

Comments by other users [edit]

Accused parties may also comment/discuss in this section below. See Defending yourself against claims

Clerk, CheckUser, and/or patrolling admin comments [edit]

@Sir Sputnik: I can't comment on this particular case, but both technical and behavioral evidence indicate that NewsYouCanUse is a sock of User:NeuroSex, so the cases should probably be merged. I've already issued a CU block to the NewsYouCanUse. Beeblebrox (talk) 23:47, 19 March 2019 (UTC)

26 May 2018 [edit]

Suspected sockpuppets [edit]

- Suuperon (talk⁺ · tag · contribs · logs · filter log · block log · CA)
- Defender1984 (talk + · tag · contribs · logs · filter log · block log · CA)
- SecondaryEd2020 (talk⁺ · tag · contribs · logs · filter log · block log · CA)
- Sciencearousal (talk⁺ · tag · contribs · logs · filter log · block log · CA)

NeuroSex edits prove it is Prause: Nicole Prause page; Staci Sprout; Gary Wilson & Park et al., 2016 (MDPI).

User contributions



For NeuroSex (talk | block log | uploads | logs | filter log)

This account is currently blocked. The latest block log entry is provided below for reference:

• 01:39, 26 May 2018 Bbb23 (talk | contribs) blocked NeuroSex (talk | contribs) with an expiration time of indefinite (account creation blocked) ({{checkuserblock-account}}: Abusing multiple accounts: Please see: Wikipedia:Sockpuppet investigations/NeuroSex)

✓ Search for contributions

- 00:55, 25 May 2018 (diff | hist) . . (-162) . . Sexual addiction (Undid revision 833320211 by Stacisprout (talk) Book by a non-expert replicating other texts already given. Appears purely promotional) (Tag: Undo)
- 21:32, 24 May 2018 (diff | hist) . . (+5) . . m. MDPI (tag missing)
- 17:03, 24 May 2018 (diff | hist) . . (+366) . . User talk:NeuroSex (→Wikipedia is not an outlet for publishing original research)
- 09:27, 24 May 2018 (diff | hist) . . (+50) . MDPI (→Controversial articles: formatting)
- 09:24, 24 May 2018 (diff | hist) . . (+1,354) .. MDPI (→Controversial articles: Added new controversial case example (more citations available if needed, just ask))
- 09:07, 24 May 2018 (diff | hist) . . (+163) . . m MDPI (Lin history of fraud)
- 21:58, 10 February 2017 (diff | hist) . . (+301) . . m. Nicole Prause (Add partnered protocol from Today show; update info box) (Tag: Visual edit)



NeuroSex: Subpages · User rights · Edit count · Edit summary search · Articles created · Global: contributions · log · accounts(meta)

Incidentally, this entire May 24, 2018 NeuroSex edit quoted private emails between Dr. Prause and MDPI official sent on or around May 22, 2018.

Revision as of 09:24, 24 May 2018 (edit) (undo)

NeuroSex (talk | contribs)

(-Controversial articles: Added new controversial case example (more citations available if needed, just ask))

Next edit →

Line 50:

=== Controversial articles ===

+ In 2015, the MDPI journal Behavioral Sciences published a paper "Is Internet Pornography Causing Sexual Dysfunctions? A Review

with Clinical Reports". It was widely promoted during political attempts to define pornography as a public health hazard. However, it was soon discovered that many fraudulent statements appeared in the paper, often claiming the opposite of what a cited study had described and not attempting to consent the cases. The listed paper editor, Scott Lane, denied having served as the editor. The listed journal editor, John Coverdale, also denied he had served as the journal editor during the review time claimed. The paper was not edited between submission and acceptance. Two of the authors subsequently were found to have undisclosed financial conflicts of interest. Specifically, Andrew Doan ran a Christian ministry that has <ref>{(cite web|title=continuously sought donations and speaking fees against pornography|url=http://realbattle.org/donate/}}</ri>
/donate/}}

/donate/}}
Gary Wilson was by <ref>{(cite web|title=paid over 9000 pounds|url=https://www.oscr.org.uk/downloadfile.aspx?id=160223&type=5&charityid=SC044948&arid=236451}}

/ref> The Reward Foundation to lobby in the US on behalf of anti-pornography state declarations. The Committee on Publication Ethics reviewed the case and recommended retraction. The publisher has refused.

Exhibit Y

Dr. Prause falsely accuses me of using misogynistic language to denigrate her.

Dr. Prause often posts the following "slide" on social media. It is kept on her AmazonAWS site (https://s3-us-west-1.amazonaws.com/weilerdefamation/SexismInNeuroscience.jpg)



WHAT SCIENCE SAYS ABOUT GENDER DISCRIMINATION AGAINST FEMALE NEUROSCIENTISTS

- "Results suggest that for women pursuing STEM, feminine appearance may erroneously signal that they are not well suited for science" Banchefsky et al (2016)
- "Variation in feminine appearance has the potential to negatively impact the current national strategic goal of creating a diverse, welcoming, and egalitarian STEM workforce" Banchefsky et al (2016)
- "Progress for women in the sciences, including neuroscience, is still slowed by personal, institutional, and cultural gender biases" Society for Neuroscience (2016)
- "Only one in five papers published in Nature Neuroscience has a female corresponding author" Nature Neuroscience (2006)

ANTI-PORN ACTIVISTS SEXISM

- "Miss Prause", "nicki [sic]" Gary Wilson, obsessed blogger yourbrainonporn.com
- "His sidekick Prause" Marnia Robinson, blogger pornstudycritiques.com, wife of Gary Wilson
- "Child molester" Donald Hilton, anti-porn LDS author/activist
- "Outspoken, funded by pornography" Senator Todd Weiler, Utah
- "That lady" National Public Radio caller, male self-identified "porn addict" explaining neuroscience
- "Unlikely antichrist" Martin Daubney, Guardian journalist
- "Nice labcoat" @J_Kane, Senator Weiler supporter
- "Porn star" poster, rebootnation.org

- "Look at those shoulders" PBS NOVA comment
- "Freak of nature" TEDx comment
 "Was that thing on stage a transgender?"
 TEDx comment
- "She looks like a drunk bitch" TEDx comment
- "Blond bimbo dyke" TEDx comment
- "If they're not men's legs I'll eat two cows"
 TEDx comment
- "All of the mysterious clown sightings" Alexander Rhodes of NoFap encouraging stalking by Wilson
- "Idiot feminist" @WhiteDragon2016 NoFap supporter with "anti-feminist" bio
- Banchefsky, S., Westfall, J., Park, B., & Judd, C. M. (2016). But You Don't Look Like A Scientist!: Women Scientists with Feminine Appearance are Deemed Less Likely to be Scientists. Sex Roles, 1-15.
- 🖥 🗖 Nature Neuroscience [Editorial] 2006 'Women in neuroscience: a numbers game', Nature Neuroscience 9(7): p.853.
- Society for Neuroscience https://www.sfn.org/Careers-and-Training/Women-in-Neuroscience ht

For more about this neuroscientist's research

It accuses me, my wife, Don Hilton MD, and Nofap founder Alexander Rhodes of misogyny. Dr. Prause's only "evidence" of my misogyny is that I once inadvertently typed "Miss Prause" when responding to comment by one of her many aliases (RealScience).

First, here Prause tweets a hard-to-read screenshot of my 2013 comment on a porn recovery forum referring to her as "Miss Prause":





Dr. Prause fails to reveal that I was responding to her question posted under my comment, asking me: "How small IS your penis Gary?" (http://www.yourbrainrebalanced.com/forum/threads/journal-article-pornography-addiction-%E2%80%93-a-supranormal-stimulus.11401/#post-284746)



Screenshot of my December, 2013 comment (as tweeted by Prause) where I inadvertently typed "Miss" in response to Dr. Prause inquiring about the size of my penis:



Active Member

RealScience said:

Except that Garnia are complete frauds, as shown by their strong objections to the Canadian Broadcasting Corporation: http://www.ombudsman.cbc.radio-canada.ca/en/complaint-reviews/2013/the-ethics-of-interviews/

They were SCHOOLED!!! Ha! Gotta love how they point fingers at others for exactly what THEY are doing. That's right, you tried to bully journalists into hiding the real story, they refused, and you threatened to sue. How small IS your penis Gary? Letting wifey take care of things for you?

Variations of this comment were posted several places yesterday by "RealScience" (or RealScientist"). Of course, this post like the others makes no sense, and has nothing to do with our back and forth with the CBC.

"RealScience" sounds exactly like Nicole Prause. Miss Prause is the head of UCLA SPAN lab and has been harassing me ever since we wrote a rebuttal of one of her studies. You can see our analysis here. Nothing Correlates With Nothing In SPAN Lab's New Porn Study (2013) http://yourbrainonporn.com/nothing-correlates-nothing-span-labs-new-porn-study-2013

UPDATE - A peer-reviewed rebuttal of the SPAN Lab paper. 'Highdesire', or 'merely' an addiction? A response to Steele et al., by Donald L. Hilton, Jr., MD* http://www.socioaffectiveneuroscipsychol.net/index.php/snp/article /view/23833/32589

UPDATE (5/30/14): You can read much of the documented history of the harassment and cyberstalking in this post - http://www.yourbrainrebalanced.com/index.php?topic=21334.msg362958#msg362958

I felt compelled to post these details when a troll with 4 user names posted about 100 times in a 3 hour period - defending the above SPAN Lab study, while simultaneously attacking the first ever fMRI brain study on porn users - which was published the previous day. The troll possessed extraordinary knowledge about the SPAN lab study, and made false accusations about my critique, in addition to several personal attacks. Eventually the troll deleted nearly all of her posts, but you can gather a lot from my comments, and comments by other YBR members.

This is the extent of Dr. Prause's "evidence" of my misogyny.