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

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

#### DECLARATION OF DARRETT "D.J." BURR

My name is Darrett Burr. Professionally, I go by D.J. Burr. I am older than 18 years of age, I am of sound mind, I have never been convicted of a felony, I am personally familiar with the facts stated herein, and I am fully capable of making this affidavit. I swear under penalty of perjury that the statements contained herein are based on my personal knowledge and are true and accurate.

I am a licensed psychotherapist (Licensed Mental Health Counselor, License Number LH60237239), a Specialist in Problematic Sexual Behavior, the author of the book, *I Just Wanted Love: Recovery of a Codependent, Sex and Love Addict.* My memoir chronicles my extensive history as an addict and details my recovery journey. My work as a psychotherapist is almost exclusively dedicated to helping those affected by early childhood trauma, codependency, and compulsive/out of control sexual behavior or sexual addiction, including, but not limited to, pornography addiction. As detailed more fully below, I have been attacked online and have been falsely accused by Nicole Prause, I believe because I disagree with her on the issue of whether pornography is addictive.

### I. Harassing Complaints to Regulatory Body

Dr. Prause made a formal complaint against me to regulatory body: Washington State Department of Health. The complaints contained false accusations against me which maligned my character.

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

Dr. Prause made an unfounded complaint to the Washington State Department of Health on April 8, 2019, which was dismissed without investigation. Dr. Prause falsely claimed that I publicly threatened to file a false complaint against her, using racist language. She further alleged that I provide "fake therapy for-profit" and I am unable to evaluate evidence and provide care to patients because I identify as a sex addict in recovery, which according to Dr. Prause there is no

diagnosis for sexual addiction or compulsive sexual behavior.

#### II. Public Bullying, Harassment, and Libel

Dr. Prause does not allow for civil discussion on social media. She lashes out when I post material about sexual addiction, citing her research claiming sexual addiction does not exist, and then she blocks me, preventing me from responding. I am also unable to see further statements she makes about me after I am blocked. She has accused me of malpractice, encouraged people to file complaints against me, and then said she would support them in their efforts.

I find it reprehensible that Dr. Prause attacked me, a black male, and then called me a racist, which is, by definition, false.

A true and accurate copy of the complaint is attached.

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

Darrett Burr