

Exhibit 7

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

ALEXANDER RHODES	§	
	§	
vs.	§	
	§	Civil Action No. 19-1366
NICOLE PRAUSE and LIBEROS LLC	§	

**DECLARATION OF STEFANIE
CARNES**

My name is Stefanie Carnes. 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 currently serve as the President of the International Institute for Trauma and Addiction Professionals (IITAP), a training institute and professional organization for addiction professionals. I also work as a senior fellow for Meadows Behavioral Healthcare, where I work with sexually addicted clients and their families. I hold a Ph.D. from The University of Georgia, I am a licensed marriage and family therapist, and I am an AAMFT approved supervisor. My area of expertise includes working with patients and families struggling with multiple addictions such as sexual addiction, eating disorders and chemical dependency. I am also a certified sex addiction therapist and clinical sexologist, specializing in therapy for couples and families struggling with sexual addiction. I present regularly at conferences at both the state and national levels. I am also the author of numerous publications including three books entitled: *Mending a Shattered Heart: A Guide for Partners of Sex Addicts*, *Facing Heartbreak: Steps to Recovery for Partners of Sex Addicts*, and *Facing Addiction: Starting Recovery from Alcohol and Drugs*.

As explained more fully below, Dr. Nicole Prause has repeatedly made false and defamatory accusations against me and IITAP. For example, in January 2017, Dr. Prause tweeted about me and IITAP regarding an article I helped author, stating that I lied in the article. She also created a fake logo for IITAP. True and accurate copies of the screen shots of Dr. Prause's comments are attached hereto as Exhibit "A". The logo Dr. Prause created/included in her tweet depicts a sock and states "IFAP before IITAP". "Fapping" is a slang word for masturbation, and the sock is also a reference to masturbation. In these tweets, Dr. Prause also states: "Therapists ignoring science since 1990". Dr. Prause has never attended an IITAP training and would not be familiar with the extensive amount of scientific literature used in the creation of our clinical materials. Her suggestion that our training ignores science is false. Indeed, our trainings meet continuing education requirements for the vast majority of the licensing boards and professional organizations in the United States, including the APA, NASW, and CAMFT. Dr. Prause's tweet and logo were clearly an effort to damage our reputation and interfere with our business.

Another example occurred in 2016, when Dr. Prause contacted a journal in which we published a paper on the psychometric properties of one of our assessment instruments. The day after a contentious interaction with me, and in an effort to retaliate, Dr. Prause contacted the publisher of the journal in which our paper was published, The Journal of Sexual Addiction and Compulsivity.

Without any evidence or basis, Dr. Prause stated that she believed that we had falsified our data, and she requested permission to replicate the data. We told the publisher that we would be happy to release the data to an independent statistician (which we did), but we would not release the data to Dr. Prause, as we knew her intent was solely malicious. The publisher, Taylor and Francis, did conduct a thorough statistical analysis of our data using an independent reviewer and determined that the data was not falsified. During the time when this analysis was conducted, Dr. Prause began to tweet false and negative statements about our instrument and organization. For example, she wrote: "Fraud discovered", stated that IITAP was "unable to produce data" and that the authors were "to face ethics charges". None of this was true. Additionally, she suggested that patients who were "paying for faux 'sex addiction' test" should consider filing a "complaint with the state board". Finally, she falsely maligned our sexual dependency inventory, by stating: "Have you paid to take this poor Sexual Dependency Inventory? Clinicians try to hide\$\$\$ scam". True and accurate copies of screen shots showing Dr. Prause's tweets are attached hereto and incorporated herein as Exhibit "B".

In fact, our testing instrument is a respected measure with numerous publications in the peer reviewed scientific literature supporting its use. Dr. Prause's statements were completely false and damaging to the reputation of our instrument. There is no effort by our clinicians to hide a money scam. We were able to produce our data, and there were no ethics charges against us or the publisher.

Dr. Prause has engaged in this type of behavior for years, and she has posted negative statements about our organization on various Internet forums. For example, in response to an article published in Psychology Today, she wrote that IITAP is "openly sexist and assaultive to scientists". Moreover, she compared our treatments to "snake oil" and stated that IITAP is "promoting profit, not treatments". Finally, she said that "IITAP/CSAT has been lying to you about this for years. It's time you asked them why they encourage sexism, stalking, and physically threatening scientists for profit". True and accurate screen shots of these and similar statements are attached and fully incorporated herein as Exhibit "C".

These statements and tweets written by Dr. Prause are false, malicious and designed to destroy my reputation as well as the reputations of the people who work with me. We are not "openly sexist" and we have never participated in "sexism, stalking, and physically threatening scientists for profit". We do not put "profits over patients" and do not engage in "snake oil" practices. All of these statements are designed to dismantle IITAP's reputation and discredit the work that we do.

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


Stefanie Carnes