

## 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](http://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](http://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>

<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](mailto: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](http://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](http://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](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%20tweeting%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/yourbrainonporn.com/files/resize/Tweet-%20report%20therapists%20to%20state%20boards_8-8-14-500x189.JPG)

<https://www.yourbrainonporn.com/sites/yourbrainonporn.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.jpg>

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

[https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/ley%20joke%20Prause%20neckbeard\\_0-450x582.JPG](https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/ley%20joke%20Prause%20neckbeard_0-450x582.JPG)

<https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/prause%20call%20belinda%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%20sex%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>

<https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/two%20friend%20no%20on%2060-300x166.JPG>

<https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/fire%20landman-350x170.JPG>

<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>

<https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/prause%20lying%20about%20MDPI-400x206.JPG>

On motorcycle by California Sunday:

<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](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/1_0-400x381.JPG)

[https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/2\\_2-400x299.JPG](https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/2_2-400x299.JPG)

In jeans jacket by Neal Preston:

<https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/prause%20defaming%20iitap%20SASH-550x236.jpg>

<https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/LIST%20OF%20DOCUMENTS%20UNDER%20PT%20POST2-550x547.JPG>

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

[https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/9-14-17%20-%20Prause%20calling%20all%20that%20believe%20in%20porn%20addiction%20misogynists\\_1-600x288.JPG](https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/9-14-17%20-%20Prause%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](mailto: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/986387599XXXXXXXXXX2482048>

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-1.amazonaws.com/weilerdefamation/PressRelease\\_DefamationBySenatorWeiler.txt](https://s3-us-west-1.amazonaws.com/weilerdefamation/PressRelease_DefamationBySenatorWeiler.txt).

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.

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

<https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/two%20friend%20no%20on%2060-300x166.JPG>

<https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/fire%20landman-350x170.JPG>

<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>

<https://www.yourbrainonporn.com/sites/yourbrainonporn.com/files/resize/prause%20lying%20about%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](mailto: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\\_130521Decision.pdf](https://beckermanlegal.com/Lawyer_Copyright_Internet_Law/agencefrancepresse_morel_130521Decision.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](mailto:PieroFGiunti@gmail.com)

[www.PieroFGiunti.com](http://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