

Response to Request for Civil Harassment Restraining Orders

Stamp date here when form is filed.

Use this form to respond to the Request (form CH-100)

- Read *How Can I Respond to a Request for Civil Harassment Restraining Orders?* (form CH-120-INFO) to protect your rights.
- Fill out this form and take it to the court clerk.
- Have someone age 18 or older—**not you**—serve the person in ① or his or her lawyer by mail with a copy of this form and any attached pages. (Use form CH-250, Proof of Service of Response by Mail.)

① Person Seeking Protection

Full name of person seeking protection (see form CH-100, item ①):
Nicole Prause

② Person From Whom Protection Is Sought

a. Your Name: Gary Wilson

Your Lawyer (if you have one for this case)

Name: William D. Coffee State Bar No.: 143653

Firm Name: Songstad Randall Coffee & Humphrey LLP

b. Your Address (If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.)

Address: 3200 Park Center Drive

City: Costa Mesa State: CA Zip: 92626

Telephone: (949) 757-1600 Fax: (949) 757-1613

E-mail Address: bcoffee@sr-firm.com

③ ☒ Personal Conduct Orders

- a. ☐ I agree to the orders requested.
- b. ☒ I do not agree to the orders requested.
(Specify why you disagree in item ⑪ on page 3.)
- c. ☐ I agree to the following orders (Specify below or in item ⑪ on page 3.)

④ ☒ Stay-Away Orders

- a. ☐ I agree to the orders requested.
- b. ☒ I do not agree to the orders requested. (Specify why you disagree in item ⑪ on page 3.)
- c. ☐ I agree to the following orders (specify below or in item ⑪ on page 3):

⑤ ☐ Additional Protected Persons

- a. ☐ I agree that the persons listed in item ③ of form CH-100 may be protected by the order requested.
- b. ☐ I do not agree that the persons listed in item ③ of form CH-100 may be protected by the order requested.

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

MAR 03 2020

Sherri R. Carter, LAWYER: Clerk/Clerk of Court
By: Christopher Herrera, Deputy

Fill in court name and street address:

Superior Court of California, County of
Los Angeles Superior Court
Central District, Family Law
111 N. Hill Street
Los Angeles, CA 90012

Court fills in case number when form is filed.

Case Number:
20STR001022

Present your response and any opposition at the hearing. Write your hearing date, time, and place from form CH-109 item ③ here:

Hearing
Date

Date: 3/5/2020 Time: 8:30 a.m.
Dept.: 22 Room: 512

If you were served with a Temporary Restraining Order, you must obey it until the hearing. At the hearing, the court may make orders against you that last for up to five years.



6 Guns or Other Firearms and Ammunition

If you were served with form CH-110, *Temporary Restraining Order*, you cannot own or possess any guns, other firearms, or ammunition. (See item ⑦ of form CH-110.) You must sell to or store with a licensed gun dealer, or turn in to a law enforcement agency, any guns or other firearms in your immediate possession or control within 24 hours of being served with form CH-110. You must file a receipt with the court. You may use form CH-800, *Proof of Firearms Turned In, Sold or Stored*, for the receipt.

- a. ☒ I do not own or control any guns or firearms.
- b. ☐ I ask for an exemption from the firearms prohibition under Code of Civil Procedure section 527.9(f) because carrying a firearm is a condition of my employment, and my employer is unable to reassign me to another position where a firearm is unnecessary. (Explain):
- ☐ Check here if there is not enough space below for your answer. Put your complete answer on an attached sheet of paper and write "Attachment 6b—Firearms Surrender Exemption" as a title. You may use form MC-025, Attachment.
- _____
- _____
- _____
- c. ☐ I have turned in my guns and firearms to the police or sold them to or stored them with a licensed gun dealer. A copy of the receipt ☐ is attached. ☐ has already been filed with the court.

7 Possession and Protection of Animals

- a. ☐ I agree to the orders requested.
- b. ☐ I do not agree to the orders requested. (Specify why you disagree in item ⑪ on page 3.)
- c. ☐ I agree to the following orders (specify below or in item ⑪ on page 3):
- _____
- _____
- _____

8 Other Orders

- a. ☐ I agree to the orders requested.
- b. ☒ I do not agree to the orders requested. (Specify why you disagree in item ⑪ on page 3.)
- c. ☐ I agree to the following orders (specify below or in item ⑪ on page 3):
- _____
- _____
- _____
- _____

9 Denial

I did not do anything described in item ⑦ of form CH-100. (Skip to ⑪.)



10 ☐ **Justification or Excuse**

If I did some or all of the things that the person in **1** has accused me of, my actions were justified or excused for the following reasons (*explain*):

☐ Check here if there is not enough space below for your answer. Put your complete answer on an attached sheet of paper and write "Attachment 10—Justification or Excuse" as a title. You may use form MC-025, Attachment.

11 ☒ **Reasons I Do Not Agree to the Orders Requested**

Explain your answers to each order requested that you do not agree with.

☒ Check here if there is not enough space below for your answer. Put your complete answer on an attached sheet of paper and write "Attachment 11—Reasons I Disagree" as a title. You may use form MC-025, Attachment.



12 ☐ **No Fee for Filing**

- a. ☐ I request that I not be required to pay the filing fee because the person in **1** claims in form CH-100 item **13** to be entitled to free filing.
- b. ☐ I request that I not be required to pay the filing fee because I am eligible for a fee waiver. (Form FW-001, Request to Waive Court Fees, must be filed separately.)

13 ☒ **Lawyer's Fees and Costs**

- a. ☒ I ask the court to order payment of my ☒ Lawyer's fees ☐ Court costs.
The amounts requested are:

<u>Item</u>	<u>Amount</u>	<u>Item</u>	<u>Amount</u>
Attorney Fees	\$		\$ 7,850.00
	\$		\$
	\$		\$

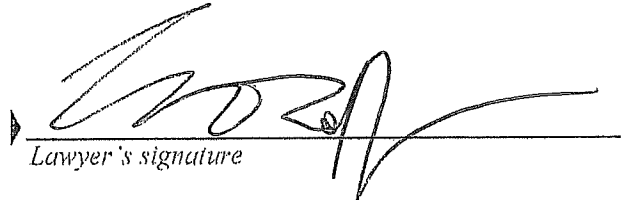
- ☐ Check here if there are more items. Put the items and amounts on the attached sheet of paper and write "Attachment 13—Lawyer's Fees and Costs" for a title. You may use or form MC-025, Attachment.

- b. ☒ I ask the court to deny the request of the person asking for protection that I pay his or her lawyer's fees and costs.

14 Number of pages attached to this form, if any: 05

Date: March 2, 2020

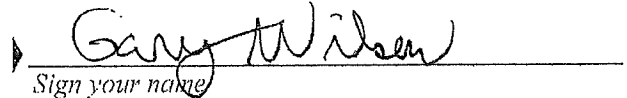
William D. Coffee, Esq.
Lawyer's name (if any)


Lawyer's signature

I declare under penalty of perjury under the laws of the State of California that the information above and on all attachments is true and correct.

Date: March 2, 2020

Gary Wilson
Type or print your name


Sign your name

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Attorneys for Respondent,
GARY WILSON

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – CENTRAL DISTRICT, FAMILY LAW

NICOLE PRAUSE,

Petitioner,

v.

GARY WILSON,

Respondent.

Case No.: 20STR001022

**OPPOSITION OF GARY WILSON TO THE
PETITIONER'S REQUEST FOR A CIVIL
HARASSMENT RESTRAINING ORDER**

Date: March 5, 2020
Time: 8:30 a.m.
Dept.: 22

Respondent GARY WILSON ("Wilson" or "Respondent") hereby submits this opposition to the Request for Civil Harassment Restraining Orders ("TRO Request") filed by petitioner NICOLE PRAUSE ("Prause").¹

I. INTRODUCTION

This matter does not involve "civil harassment" in any way, shape or form. Prause resides in California and Wilson resides in Oregon. Wilson has never used violence against Prause and has never made any threats against Prause. In fact, Wilson has never met Prause or even spoken to her.

¹ Prause did not serve the TRO Request on Wilson. However, Wilson learned the TRO Request had been filed and is filing this opposition to protect his rights and defend against the false allegations made by Prause.

1 The only conduct Wilson has engaged in that relates to Prause is to exercise his constitutional
2 right to free speech by expressing opinions on his website regarding the adverse effects of
3 pornography that differ from Prause's pro-pornography position, and to provide truthful testimony in
4 support of those who are currently suing Prause for defamation. In retaliation, Prause filed this
5 frivolous TRO Request based on allegations that are demonstrably false. The Court should deny this
6 TRO Request in its entirety and award Wilson his attorney fees incurred in defending the Request.

7 **II. STATEMENT OF FACTS AND PROCEDURAL HISTORY**

8 **A. Relevant Background**

9 Wilson is a former anatomy, physiology, and pathology instructor. Wilson taught at
10 vocational schools in California and Oregon, and also as an adjunct instructor at Southern Oregon
11 University. Wilson was forced to retire due to a chronic recurring illness. (Declaration of Gary
12 Wilson ("Wilson Declaration"), at ¶ 3).

13 Since 2010, Wilson has maintained a website entitled www.yourbrainonporn.com that
14 presently includes over 13,000 pages of material pertaining to research on pornography's effects on
15 individuals as well as other related matters of public interest. The purpose of the website is to report
16 and archive the existing research that shows the effects of pornography, chronicle recovery stories of
17 former pornography users, and serve as a clearinghouse for related items of public interest. (Wilson
18 Declaration, ¶ 4).

19 Wilson is also the author of a book entitled *Your Brain on Porn: Internet*
20 *Pornography and the Emerging Science of Addiction*, which tracks research developments in the
21 field. This book was published in 2014 and updated in 2017. Wilson's book and website are reviled
22 by proponents of the pornography industry because of the viewpoints and opinions expressed by
23 Wilson and others, including critiques of questionable research and studies made by proponents of
24 pornography. (Wilson Declaration, ¶¶ 5-6).

25 Prause is a researcher and former academic who resides in Los Angeles. Prause's
26 opinions often differ from Wilson's as she is a strong proponent of pornography. There is much
27 evidence that she is cozy with the pornography industry – public acceptance of an offer of help from
28 the industry online, photos of her attending industry events, backing the industry's interests

1 consistently on social media, and attacking and defaming on social media and in false reports those
2 who raise awareness of the potential risks of digital pornography use. (Wilson Declaration, ¶ 7).

3 In or around 2013, Wilson critiqued a questionable study published by Prause, which
4 Prause and her allies assert “debunks porn addiction.” Since then, multiple other researchers have
5 critiqued this study in the peer-reviewed literature, questioning her interpretation of its findings.
6 Since that time, Prause’s false accusations and defamatory attacks on her critics have escalated. In
7 recent years, she has engaged in a repeated practice of making frivolous complaints and reports to
8 licensing boards, law enforcement and other authorities about Wilson and others who disagree with
9 her. Prause has also falsely claimed she has filed reports when she has not done so. (Wilson
10 Declaration, ¶ 8).

11 For example, Prause has repeatedly publicly claimed that she filed two FBI
12 reports against Wilson. Wilson confirmed through a Freedom of Information Act (“FOIA”)
13 request that the FBI had no such reports. No FBI official has ever contacted Wilson. In 2018,
14 Prause filed a report against Wilson with the Los Angeles Police Department (which she
15 attaches to her TRO Request). It did not allege that Wilson committed any crime. Instead,
16 Prause seemed to object that Wilson attended a conference in Germany (which Wilson did,
17 having registered in advance, to hear the latest research on behavioral addiction from world
18 experts). Prause also seems to allege that Prause saw Wilson wearing a sleeping bag, armed
19 with a long-sleeved sweater. The physical description does not match Wilson’s height, weight,
20 age or eye-color. The police took no action and in fact never contacted Wilson. Wilson only
21 learned of the LAPD report a year later when Prause persuaded a Wisconsin student newspaper
22 to publish it online. (The University of Wisconsin swiftly removed it when Wilson
23 complained.) (Wilson Declaration, ¶ 9).

24 Prause is currently a defendant in two defamation lawsuits entitled Donald L.
25 Hilton, Jr. v. Nicole Prause, et al., United States District Court for the Western District of Texas
26 San Antonio Division, Case No. 5: 19-CV-00755-OLG, and Alexander Rhodes v. Nicole Prause, et
27 al., United States District Court for the Western District of Pennsylvania, Case No. 2:19-cv-
28 01366. Hilton is a neurosurgeon and Rhodes runs the world’s largest online English-speaking

1 peer-support forum for those experimenting with giving up internet porn use. Both plaintiffs
2 are pursuing claims for defamation against Prause as a result of Prause's false claims, including
3 stalking, sexual harassment, antisemitism, non-existent restraining orders and groundless
4 reports to professional boards and academic journals. While Wilson is not a party to either of
5 the above-referenced lawsuits, Wilson signed sworn affidavits in both matters. (Wilson
6 Declaration, affidavit in the Hilton v. Prause case attached as **Exhibit "1,"** affidavit in the
7 Rhodes v. Prause, et al. case, which was recently filed on January 24, 2020, attached as **Exhibit**
8 **"2."**) (Wilson Declaration, ¶ 10).

9 On February 12, 2020, Wilson received a call from a police officer with the
10 Ashland, Oregon police department who told Wilson Prause had spoken to him in an attempt to
11 have the police take action against Wilson. The officer told Wilson he intended to inform
12 Prause that he could not help her, because the matter was civil as no crimes were alleged.
13 (Wilson Declaration, ¶ 11).

14 **B. Prause Files Retaliatory Request For Restraining Orders Against Wilson**

15 On or about February 13, 2020, Prause filed an ex parte Request for a Temporary
16 Civil Harassment Restraining Orders against Wilson in this matter without notice to Wilson. The
17 Court denied Prause's ex parte request finding that the "allegations made in the Request do not
18 support the issuance of a restraining order without a hearing." The Court set the matter for hearing
19 on March 5, 2020.

20 **III. ARGUMENT**

21 **A. Prause's Burden Of Proof**

22 A petitioner in a civil harassment restraining order case must satisfy a high burden of
23 proof in order to convince a judge to issue the order. A civil harassment restraining order will only
24 be granted if there is "clear and convincing evidence" that harassment exists. Cal. Civ. Proc. Code
25 §527.6(i). The party to be enjoined has certain important due process safeguards, i.e., "a full
26 opportunity to present his or her case, with the judge required to receive relevant testimony and to
27 find the existence of harassment by 'clear and convincing' proof of a 'course of conduct' that
28

1 actually and reasonably caused substantial emotional distress, had ‘no legitimate purpose,’ and was
2 not a ‘constitutionally protected activity.’” Adler v. Vaicius, 21 Cal.App.4th 1770, 1775 (1993).

3 Here, Prause cannot meet this high burden as she has absolutely no proof of any
4 harassment by Wilson. Moreover, she is clearly seeking to stop Wilson from engaging in conduct
5 that serves a legitimate purpose and is constitutionally protected activity.

6 **B. There is No Basis For Any Restraining Orders Against Wilson**

7 **1. Wilson Has Not Harassed Prause**

8 Wilson has not harassed Prause in any way and thus there is no basis for the
9 issuance of the Restraining Order. Code of Civil Procedure section 527.6(b) defines “harassment” as
10 “unlawful violence, a credible threat of violence, or a knowing and willful course of conduct
11 directed at a specific person that seriously alarms, annoys, or harasses the person, and that serves no
12 legitimate purpose and is not constitutionally protected.” To constitute harassment, the course of
13 conduct “must be such as would cause a reasonable person to suffer substantial emotional distress,
14 and must actively cause substantial emotional distress to the petitioner.” R.D. v. P.M., 202
15 Cal.App.4th 181, 188 (2011). The question is whether the evidence shows “harassment sufficient to
16 place a reasonable person in fear of his or her own safety, or the safety of his or her immediate
17 family.” Id. at 189.

18 Here, Prause fails to provide any evidence of any harassment by Wilson,
19 much less evidence that would establish harassment as defined by the statute by clear and
20 convincing proof. Prause’s primary allegation appears to be that Wilson posted her home address
21 and telephone on his website. Even if this were true, it would not constitute civil harassment. In any
22 event, it is false. Wilson does not even know Prause’s home address and telephone number, and has
23 confirmed through his website provider that no such information is on his website. (Wilson
24 Declaration, ¶ 4, Exh. 3). Further, Prause concedes Wilson does not know her home address and
25 admits that for years she has posted fake addresses for her and her company which remain posted on
26 multiple sites across the Web and appear on Google. (Wilson Declaration, ¶ 13, Exhs. 4, 5).

27 Prause’s TRO Request contains numerous other fabrications. Prause states
28 there are currently protective or restraining orders in effect against Wilson relating to her. (TRO

1 Request, ¶ 6b). This is false. No such orders exist, nor has Prause ever obtained such orders against
2 Wilson. (Wilson Declaration, ¶ 14). Prause also claims the police had to come because of
3 harassment by Wilson. (TRO Request, ¶ 7a (6)). This is also false. While Prause did unilaterally
4 file a bogus police report regarding Wilson in 2018, the police took no action and did not even
5 contact Wilson. (Wilson Declaration, ¶ 9).

6 Perhaps most troubling, Prause states in her TRO Request that Wilson has
7 threatened her with a gun. (TRO Request, ¶ 7a (4)). This is another lie by Prause. Prause bases this
8 outrageous claim on grainy copies of photographs she attaches to the TRO Request which she claims
9 depict Wilson and his son with guns. Prause's allegations are completely false and appear to be an
10 effort to deliberately mislead the Court. In fact, Wilson does not appear in any photographs with a
11 gun. Wilson does not own any guns, and has never owned a gun. (Wilson Declaration, ¶ 15). The
12 photographs were taken years ago and depict Gary Wilson's son Arion Sprague engaging in
13 perfectly lawful activity. (Declaration of Arion Sprague).

14 In summary, the evidence clearly shows that Wilson has never met or spoken
15 to Prause, does not live anywhere near Prause, and has not engaged in any type of civil harassment
16 against her whatsoever. Prause's allegations to the contrary are utterly frivolous.

17 **2. Wilson is Engaging in Constitutionally Protected Activity Which Cannot**
18 **Be Restrained**

19 California Code of Civil Procedure section 527.6 cannot be used to prohibit
20 constitutionally-protected speech. Smith v. Silvey, 149 Cal.App.3d 400, 406-407 (1983). Harassing
21 speech must be "between purely private parties, about purely private parties, and on matters of
22 purely private interest." Brekke v. Willis, 125 Cal.App.4th 1400, 1409 (2005).

23 It is clear that Prause is attempting to use this TRO Request to stifle Wilson's
24 right to free speech. Prause's retaliatory frivolous TRO Request is the result of the public difference
25 of opinion online over the effects of pornography between Prause on the one hand, and Wilson and
26 others, as well as Wilson's efforts to defend himself and protect his rights in the face of retaliatory
27 actions Prause has previously taken. Further, Prause is clearly using the TRO Request in an attempt
28 to intimidate Wilson from acting as a witness in the defamation lawsuits now pending against her,

1 and to expunge the evidence of her malicious activity (much of which is in the form of screen shots
2 of her tweets on Wilson's website). (Wilson Declaration, ¶ 17).

3 This is clearly not a dispute involving matters of purely private interests
4 between purely private parties. Under California law, a court cannot issue a restraining order against
5 Wilson simply for expressing his opinions and defending himself on his website.

6 **C. Wilson Should Be Awarded His Attorney Fees**

7 The prevailing party is entitled to an award of court costs and attorney fees, even if
8 Plaintiff brought the action in good faith. See Cal. Civ. Proc. Code §527.6(s); see also Krug v.
9 Maschmeier, 172 Cal.App.4th 796, 802-803 (2009).² As set forth above, Prause's TRO Request not
10 only has no merit, but is clearly brought in bad faith.

11 Accordingly, the Restraining Order should be denied and Wilson should be awarded
12 attorney's fees in the amount of \$7850 he has incurred in defending this frivolous TRO Request.

13 **IV. CONCLUSION**

14 For the reasons set forth above, Wilson respectfully requests that the Court deny Prause's
15 Request for Restraining orders against Wilson in all respects. Wilson further requests that he be
16 awarded his attorney fees against Prause in the amount of \$7850 pursuant to California Code of Civil
17 Procedure section 527.6(s).

18
19 Dated: March 2nd, 2020

SONGSTAD RANDALL
COFFEE & HUMPHREY LLP

20
21 By: 

22 WILLIAM D. COFFEE
23 JENNA L. GRIFFIN
24 Attorneys for Respondent
25 GARY WILSON
26

27 ² Prause improperly claims the right to recover fees for actions she allegedly took that had nothing to do with this TRO
28 Request. Moreover, she is pro per and therefore cannot recover fees in any event. Thomas v. Quintero, Cal.App.4th
635, 651 (2005).

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6 Attorneys for Respondent,
GARY WILSON
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT, FAMILY LAW**
10

11 NICOLE PRAUSE,

12 Petitioner,

13 v.

14 GARY WILSON,

15 Respondent.
16
17
18
19

Case No.: 20STR001022

**DECLARATION OF WILLIAM D. COFFEE,
ESQ. IN SUPPORT OF THE OPPOSITION
OF GARY WILSON TO THE PETITIONER'S
REQUEST FOR A CIVIL HARASSMENT
RESTRAINING ORDER**

Date: March 5, 2020
Time: 8:30 a.m.
Dept.: 22

20 I, William D. Coffee, declare and state as follows:

21 1. I am a partner in the law firm of Songstad Randall Coffee & Humphrey LLP
22 (“SRCH”), attorneys of record for Respondent Gary Wilson (“Wilson”). If called upon to testify to
23 the matters stated herein, I could and would do so competently of my own personal knowledge.

24 2. I am a 1989 graduate of the University of Texas School of Law and have been
25 practicing in the State of California since January 1990. I have been and will be charging my usual
26 hourly billing rate of \$475.00 per hour in this matter.

27 ///

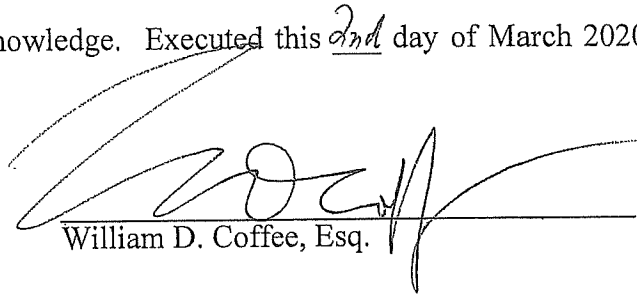
28 ///

1 3. I spent seven hours reviewing and revising Wilson's opposition to the TRO Request
2 herein. I expect to incur another three hours in having to prepare for, travel to, and attend the
3 hearing on the TRO Request.

4 4. Additionally, my associate attorney, Jenna L. Griffin, spent 10 hours in reviewing,
5 preparing and drafting the response forms, opposition brief, and declarations in support of Wilson's
6 opposition to the TRO Request herein. Ms. Griffin is a graduate of California Western School of
7 Law and has been practicing law since 2012. Ms. Griffin is charging her usual hourly rate of \$310
8 in this matter.

9 5. Accordingly, pursuant to California Code of Civil Procedure section 527.6(s) Wilson
10 requests an award of attorney's fees in the total amount of \$7,850.

11 I declare under penalty of perjury under the laws of the State of California that the foregoing
12 is true and correct and of my own personal knowledge. Executed this 2nd day of March 2020 at
13 Costa Mesa, California.


William D. Coffee, Esq.

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Attorneys for Respondent,
GARY WILSON

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES – CENTRAL DISTRICT, FAMILY LAW

NICOLE PRAUSE,

Petitioner,

v.

GARY WILSON,

Respondent.

Case No.: 20STR001022

**DECLARATION OF GARY WILSON IN
SUPPORT OF THE OPPOSITION OF GARY
WILSON TO THE PETITIONER'S
REQUEST FOR A CIVIL HARASSMENT
RESTRAINING ORDERS**

Date: March 5, 2020
Time: 8:30 a.m.
Dept.: 22

I, Gary Wilson, declare and state as follows:

1. I am a resident of Ashland, Oregon. I make this declaration in opposition to the Request for Civil Harassment Restraining Orders ("TRO Request") filed against me by Nicole Prause ("Prause"). I am over the age of 18 and if called upon to testify to the matters stated herein, I could and would do so competently of my own personal knowledge.

2. Prause's TRO Request is completely frivolous. I have never harassed Prause or threatened her safety. In fact, I have never met Prause, never spoken to Prause, and to my knowledge, have never even been in the same city with Prause. As set forth below, my interaction with Prause has been limited to a public difference of opinion online over the effects of

1 pornography, and my efforts to defend myself and protect my rights in the face of the retaliatory
2 actions Prause has taken against me.

3 3. I am a former anatomy, physiology, and pathology instructor. I taught at vocational
4 schools in California and Oregon, and also as an adjunct instructor at Southern Oregon University. I
5 was forced to retire due to a chronic recurring illness.

6 4. Since 2010, I have maintained a website entitled www.yourbrainonporn.com that
7 presently includes over 13,000 pages of material pertaining to research on pornography's effects on
8 individuals as well as other related matters of public interest. The purpose of my website is to report
9 and archive the existing research that shows the effects of pornography, chronicle recovery stories of
10 former pornography users, and serve as a clearinghouse for related items of public interest.

11 5. I am also the author of a book entitled *Your Brain on Porn: Internet Pornography*
12 *and the Emerging Science of Addiction*, which tracks research developments in the field. This book
13 was published in 2014 and updated in 2017.

14 6. My book and website are reviled by proponents of the pornography industry because
15 of the viewpoints and opinions expressed by me and others, including critiques of questionable
16 research and studies made by proponents of pornography.

17 7. Prause is a researcher and former academic who resides in Los Angeles. Prause's
18 opinions often differ from mine as she is a strong proponent of pornography. There is much
19 evidence that she is cozy with the pornography industry – public acceptance of an offer of help from
20 the industry online, photos of her attending industry events, backing the industry's interests
21 consistently on social media, and attacking and defaming on social media and in false reports those
22 who raise awareness of the potential risks of digital pornography use.

23 8. In or around 2013, I critiqued a questionable study published by Prause, which Prause
24 and her allies assert “debunks porn addiction.” Since then, multiple other researchers have critiqued
25 this study in the peer-reviewed literature, questioning her interpretation of its findings. Since that
26 time, Prause's false accusations and defamatory attacks on her critics have escalated. In recent
27 years, she has engaged in a repeated practice of making frivolous complaints and reports to licensing
28

boards, law enforcement and other authorities about me and others who disagree with her. Prause has also falsely claimed she has filed reports when she has not done so.

9. For example, Prause has repeatedly publicly claimed that she filed two FBI reports against me. I confirmed through a Freedom of Information Act ("FOIA") request that the FBI had no such reports. No FBI official has ever contacted me. In 2018, Prause filed a report against me with the Los Angeles Police Department (which she attaches to her TRO Request). It did not allege that I committed any crime. Instead, she seemed to object that I attended a conference in Germany (which I did, having registered in advance, to hear the latest research on behavioral addiction from world experts). She also seems to allege that she saw me wearing a sleeping bag, armed with a long-sleeved sweater. The physical description does not match my height, weight, age or eye-color. The police took no action and in fact never contacted me. I only learned of the LAPD report a year later when Prause persuaded a Wisconsin student newspaper to publish it online. (The University of Wisconsin swiftly removed it when I complained.)

10. Prause is currently a defendant in two defamation lawsuits entitled Donald L. Hilton, Jr. v. Nicole Prause, et al., United States District Court for the Western District of Texas San Antonio Division, Case No. 5: 19-CV-00755-OLG, and Alexander Rhodes v. Nicole Prause, et al., United States District Court for the Western District of Pennsylvania, Case No. 2:19-cv-01366. Hilton is a neurosurgeon and Rhodes runs the world's largest online English-speaking peer-support forum for those experimenting with giving up internet porn use. Both plaintiffs are pursuing claims for defamation against Prause as a result of Prause's false claims, including stalking, sexual harassment, antisemitism, non-existent restraining orders and groundless reports to professional boards and academic journals. While I am not a party to either of the above-referenced lawsuits, I have signed sworn affidavits in both matters. A true and correct copy of my affidavit in the Hilton v. Prause case is attached hereto as **Exhibit "1."** A true and correct copy of my affidavit in the Rhodes v. Prause, et al. case, which was recently filed on January 24, 2020, is attached hereto as **Exhibit "2."**

1 11. On February 12, 2020, I received a call from a police officer with the Ashland,
2 Oregon police department who told me Prause had spoken to him in an attempt to have the
3 police take action against me. After our discussion, the officer told me he intended to inform
4 Prause that he could not help her, because the matter was civil as no crimes were alleged. The
5 next day, February 13, 2020, Prause filed the TRO Request against me. While Prause has never
6 served me with the TRO Request, I learned that it had been filed. I have reviewed the TRO
7 Request. The allegations Prause makes in support of the TRO Request are not true.

8 12. Prause claims I have posted her home address and telephone number on my
9 website. This is not true. I have never posted Prause's home address or phone number on my
10 website, Twitter, or anywhere else. I do not know Prause's home address or phone number.
11 The company that hosts my website, Linode, has confirmed that they can find no such
12 information on my website. A true and correct copy of Linode's response to me dated
13 January 31, 2020 confirming that Prause's home address and telephone number are not on my
14 website is attached hereto as **Exhibit "3."**

15 13. Prause concedes I could not know her home address and admits that she has, for
16 years, posted nothing but false addresses, whenever she posts her address (such as on her failed
17 application to grab the trademarks for my well established website and its URL). A true and
18 correct copy of Prause's February 10, 2020 Twitter posts admitting she posts only fake
19 addresses is attached hereto as **Exhibit "4."** Fake addresses for her and for her company Liberos
20 are still posted on multiple sites across the web and appear on Google. A true and correct copy
21 of the results of a Google search for Prause that I performed on February 10, 2020, is attached
22 hereto as **Exhibit "5."**

23 14. Prause alleges she has other protective or restraining orders against me. This is
24 false. No such orders exist, nor has Prause ever obtained such orders against me.

25 15. Prause attaches photographs to her Request she claims depict me and my son
26 holding guns. This is also false. I am not depicted in the photographs that show guns. I do not
27 own any guns, and have never owned one.
28

1 16. I have never used any violence against Prause or threatened to use any violence
2 against her. I have not made any threats against Prause whatsoever nor urged anyone else to do
3 so. I have never harassed her in any way. All of Prause's allegations claiming that I have
4 threatened or harassed her are completely false.

5 17. I firmly believe Prause has filed this TRO Request in an effort to stifle my right
6 to free speech, to intimidate me from acting as a witness in the defamation lawsuits now
7 pending against her, and to attempt to expunge the evidence of her malicious activity (much of
8 which is in the form of screenshots of her tweets on my website). Prause has also threatened
9 other witnesses in the defamation lawsuits with groundless, costly legal proceedings.

10 I declare under penalty of perjury under the laws of the State of California that the foregoing
11 is true and correct and of my own personal knowledge. Executed this 28th day of February 2020 at
12 Ashland, Oregon.

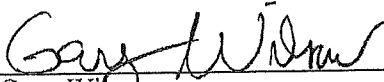
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EXHIBIT 1

CAUSE NO. 2019CI09367

DONALD L. HILTON JR
Plaintiff

VS.

NICOLE PRAUSE and LIBEROS LLC
Defendants

§
§
§
§
§
§
§

IN THE DISTRICT COURT OF

BEXAR COUNTY, TEXAS

408th JUDICIAL DISTRICT

AFFIDAVIT 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 (11,000+ pages) featuring relevant research on pornography's effects among other items of interest: www.yourbrainonporn.com.

I have been the target of a number of disturbing attacks by Dr. Nicole Prause, a limited sample of which appear below.

1. The most recent attack is Dr. Prause's attempt to trademark my website's well-established URL and the title of my book (and website). In mid-April 2019 she also set up an "impostor" website designed to divert traffic from my website, proclaiming her website to be the "real" Your Brain On Porn (www.realyourbrainonporn.com). Among other efforts to confuse visitors, the browser tabs for her new site feature the exact name of my website (not her site's name). Moreover, her press release about it claims to be from Ashland, OR where I live (and she does not). My attorneys have sent her a Cease and Desist letter. A true and accurate copy of such letter is attached hereto as Exhibit "A".
2. In April, 2018 Dr. Prause filed a false police report about me with the Los Angeles Police Department (LAPD) wherein she claimed that I stalked her in a sleeping bag, armed with a long-sleeved sweater. She also made other untrue allegations at this time. To my knowledge, there never was any police investigation conducted by LAPD or any other law enforcement agency. I first learned of her false report in March 2019 when Dr. Prause persuaded a student editor at University of Wisconsin - Lacrosse to publish her false report online. I am informed by the LAPD that complaints such as the one published are not public documents, and 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 is attached hereto as Exhibit "B".



3. 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, attached hereto as Exhibit "C," and 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.
4. 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. A true and accurate copy of a sampling of the documents authored by, or containing statements by, Dr. Prause wherein she claimed that I had been fired is attached and incorporated herein as Exhibit "D". Dr. Prause also falsely stated in the Mikesouth.com article reproduced in Exhibit "D" 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. Further, she falsely tweeted that I had been "paid-off by an anti-porn org." The accusations are not true. I was not a student and 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.
5. 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 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." On March 11, 2018, she 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. See Exhibit "E." I engaged in no fraud, and I made my credentials perfectly clear to the organizers who initially invited me.
6. 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. A true and accurate copy of her statements that she reported me to the FBI is attached and incorporated herein as Exhibit "F".
 - b. In October, 2016 Dr. Prause placed a PDF on AmazonAWS with screenshots of emails involving Washington University PD Patrolman Tim Dennis (St. Louis) falsely warning him that I intended to stalk Dr. Prause at the St. Louis AASECT

conference. A true and accurate copy of the PDF is attached and incorporated herein as Exhibit "G".

- 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 5 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 herein as Exhibit "H".

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.

7. In 2015 and 2016, Dr. Prause misused confidential information she obtained while reviewing a scholarly article I co-authored with 7 US Navy physicians. She did so in violation of ethics rules. In 2015, she used a false identity 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 herein as Exhibit "I". 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 herein as Exhibit "J".
8. 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 herein as Exhibit "K".
9. Over the past 5 years, Dr. Prause has employed multiple aliases to edit several different Wikipedia pages inserting false and defamatory material about me.

Further Affiant sayeth not.

VERIFICATION

STATE OF OREGON §
COUNTY OF JACKSON §

Before me, the undersigned authority, on this day personally appeared Gary Wilson the affiant, whose identity is ~~known~~^{proven} to me. After I administered an oath, affiant testified as follows:

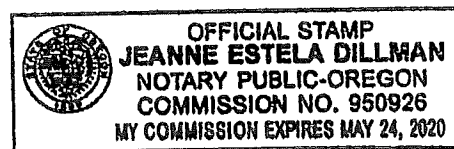
"My name is Gary Wilson. I am capable of making this verification. I have read the affidavit, and the facts stated in it are within my personal knowledge and are true and correct."

Gary Wilson
Gary Wilson

Sworn to and subscribed before me on this the 5th day of JUNE, 2019.

Jeanne Dillman
Notary Public in and for
the State of OREGON

My commission expires: 05-24-2020



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 ([REDACTED]@liberoscenter.com)
Confirmation by U.S. Mail and Courier

Dr. Nicole Prause
Liberos LLC

[REDACTED]
Los Angeles, CA [REDACTED]

Re: Unauthorized Use of YOUR BRAIN ON PORN
Our Ref. No. 8956-145727

Dear Dr. Prause:

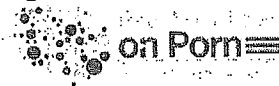
We represent Mr. Gary Wilson (doing business as Your Brain On Porn) in connection with his intellectual property rights. As you know, our client owns and uses the trademarks YOUR BRAIN ON PORN; the YOUR BRAIN ON PORN Logo, ; and YBOP in connection with providing educational services and providing information 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

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, , 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) (4) Remove from social media sites, including, but not limited to, Twitter (<https://twitter.com/BrainOnPorn>), Reddit (<https://www.reddit.com/user/sciencearousal>),

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



Alisa C. Simmons

Enclosures

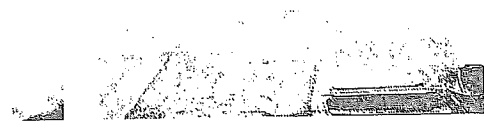
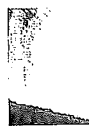
DATA ANALYSIS

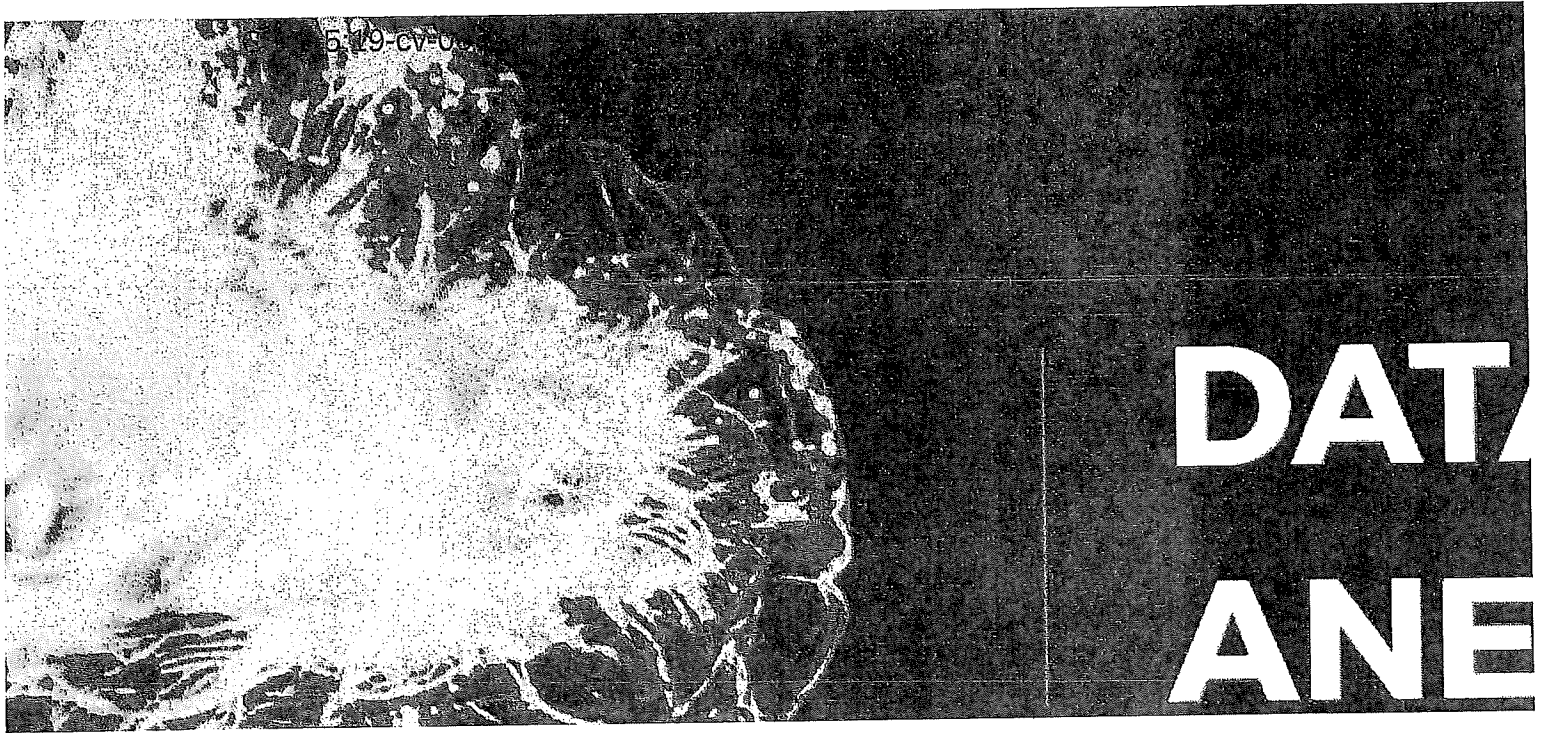
Sexuality often is a source of panic in the United States. When the vibrator appeared, the panic was that women would no longer get married or have children.

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 Damian Sandler error, talk to experts in sexuality!



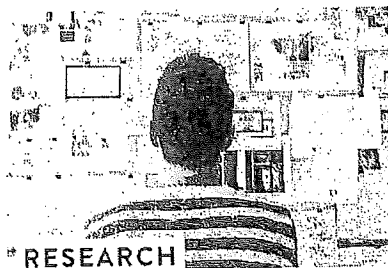


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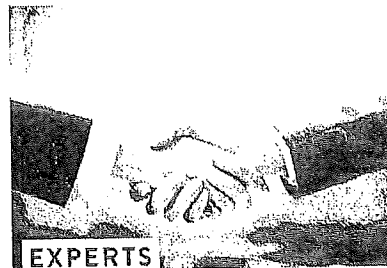
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Reach out to us individually on our "experts" page.



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Country(s)

United States
Australia
India
Hong Kong
England
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More Countries



New website "RealYourBrainOnPorn.com" launches for scientifically accurate information about pornography

Industry News

All News

Exclusive News

April 2019

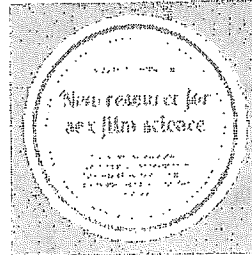
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Scientists and therapists specially trained in sexuality have merged their knowledge to support media, students, and consumers previously misled by inaccurate health information about pornography.

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.



Share announcement

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.

Contact

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

Photo:
<https://www.pdxon.org/12765427/>

End
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 ☐ [Disclaimer](#) [Report Abuse](#)

Page Updated Last on Apr 18, 2019

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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>

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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.

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

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

July 2, 2018

Gary Wilson
545 Grandview
Ashland, Oregon 97520

Re: Disposition of Case #2018-008

Dear Mr. Wilson,

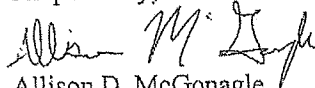
The Oregon Board of Psychology received a complaint that alleges your conduct may have violated governing Board rules and/or statutes. The complaint alleges that you have been practicing psychology without a license. The Board has completed its investigation into the above referenced complaint. The Board 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

Quora

What do you think about your brain on porn movement?

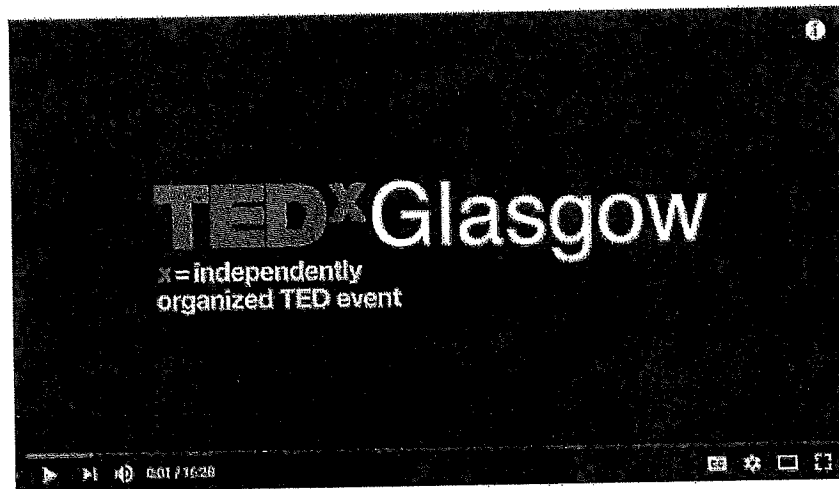


Nicole Prause, worked at University of California, Los Angeles
Answered Mar 3, 2018

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). This movement has been documented by scientists to promote misogyny, such as encouraging men to use women without their consent to "test" their erections.

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.



The great porn experiment | Gary Wilson | TEDxGlasgow

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Dr. Nicole Prause Destroys YourBrainOnPorn: 'Don't fall for it'

By [VOICE FOR REASON](#) • Published: [MARCH 3, 2013](#) • [SCUMBAGS](#)

YourBrainOnPorn is a scam that relies on fake science, says leading researcher

Nicole Prause, Ph.D is an American neuroscientist researching human sexual behavior, addiction, and the physiology of sexual response, as well as a licensed psychologist. In 2013, Prause co-authored a renowned study into the neurophysiology of pornography addiction which concluded that hypersexuality might be better understood as a "non-pathological variation of high sexual desire," rather than an addiction.



HOME

READER MAIL

INTERVIEWS

PORN STAR OF THE WEEK

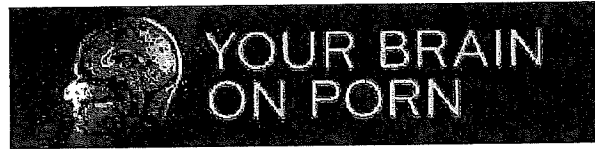
LEGAL NEWS

PORN IDENTITY

GOSSIP

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 **YourBrainOnPorn**, adding to the chorus of jeers at fear-based scams masquerading as science.



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".

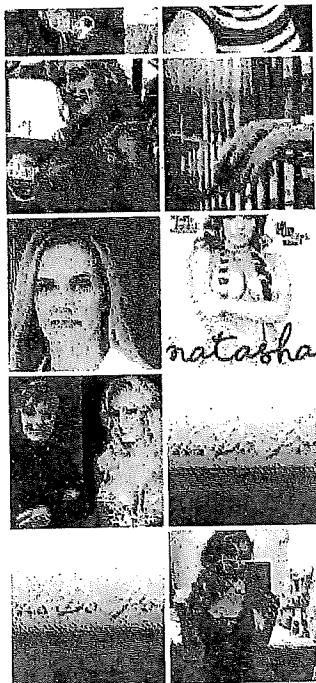
In reality, he was supposed to be an undergrad instructor, not a professor, for a lab section at Southern Oregon University. He was fired without pay immediately before completing even a quarter.

Most Popular on Mike South

Recent MikeSouth.com Comments

SOUTHERN OREGON UNIVERSITY PAYROLL SERVICE STATE CHANGE AND/OR REQUEST FOR EMPLOYMENT CONTRACT CHANGE									
1. IDENTIFY NAME: Gregory, John		2. SSN: [REDACTED]		3. POSITION: Professor		4. DEPARTMENT: Biological Sciences			
5. REASON FOR ACTION: Change of position from Professor to Assistant Professor									
6. CHANGE TO:		FROM:				TO:			
7. DATE: 11/15/18		8. FROM: Professor				9. TO: Assistant Professor			
10. EFFECTIVE DATE: 11/15/18		11. FROM: 11/15/18				12. TO: 11/15/18			
13. RATE: \$12.00		14. FROM: \$12.00				15. TO: \$12.00			
16. BENEFIT PLAN: None		17. FROM: None				18. TO: None			
19. HEALTH PLAN: None		20. FROM: None				21. TO: None			
22. DENTAL PLAN: None		23. FROM: None				24. TO: None			
25. LIFE INSURANCE: None		26. FROM: None				27. TO: None			
28. RETIREMENT PLAN: None		29. FROM: None				30. TO: None			
31. EMPLOYER'S SIGNATURE: [Signature]									
32. EMPLOYEE'S SIGNATURE: [Signature]									
33. DATE: 11/15/18									
34. PRINT NAME: Gregory, John									
35. PRINT NAME: Gregory, John									
36. DATE: 11/15/18									
37. DATE: 11/15/18									

mharris127 on Content: Caution and Enrich



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

joeschmae on Trinity St. Clair Caught Secretly Filming Sessions with Johns and Selling The Videos Without Their Knowledge

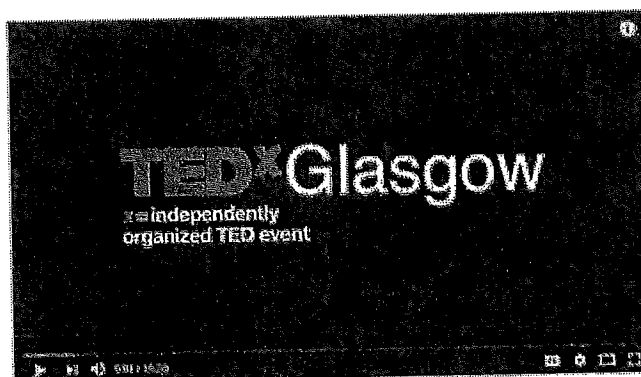
i am The Man from Nantucket on On International Women's Day: Feminist Democrat Barbara Boxer Calls a Porn Star a Source of Embarrassment, Humiliation

On international Women's Day, Feminist Democrat Barbara Boxer Calls a Porn Star a Source of Embarrassment, Humiliation - Mike Southon Hollywood Hypocrites Judd Apatow and Choices Handler Can On EGOT

completing even a quarter.

SOUTHERN ILLINOIS UNIVERSITY PAYROLL EMPLOYMENT STATUS CHANGE			
ABSORB REQUEST FOR EMPLOYMENT CONTRACT CHANGE			
EMPLOYEE NAME	[Redacted]		
REASON FOR ACTION	[Redacted]		
CHANGING	FROM	TO	
1. POSITION	[Redacted]	[Redacted]	
2. RATE	[Redacted]	[Redacted]	
3. CLASS	[Redacted]	[Redacted]	
4. GRADE	[Redacted]	[Redacted]	
5. PAY PLAN	[Redacted]	[Redacted]	
6. EMPLOYMENT STATUS	[Redacted]	[Redacted]	
7. EFFECTIVE DATE	[Redacted]	[Redacted]	
8. APPROVED BY	[Redacted]	[Redacted]	
9. APPROVED DATE	[Redacted]	[Redacted]	
10. COMMENTS	[Redacted]		
APPROVAL SIGNATURES			
1. EMPLOYEE	2. SUPERVISOR	3. HUMAN RESOURCES	4. FINANCE
[Redacted]	[Redacted]	[Redacted]	[Redacted]
APPROVAL			
1. EMPLOYEE	2. SUPERVISOR	3. HUMAN RESOURCES	4. FINANCE
[Redacted]	[Redacted]	[Redacted]	[Redacted]

Further, his TEDx talk carries a fraud warning.



porn crusade could mean lots of lawsuits against pornographers
 mharris127 on Golden Harvey Weinstein 'Casting Couch' Statute Erected in Hollywood In Advance of Tonight's Academy Awards
 mharris127 on Adriana Chechik's Band of Bullies is Back Again attacking Lana Rhoades
 mharris127 on EFF Fights HTPA/Porn Watching Fee' Bills In Several State Legislatures
 mharris127 on VPN time: Corrupt, Muslim-dominated Indonesia blocks Tumblr over porn
 Sam Langhorne on EFF Fights HTPA/Porn Watching Fee' Bills In Several State Legislatures
 Karmazin on VPN time: Corrupt, Muslim-dominated Indonesia blocks Tumblr over porn
 Karmazin on EFF Fights HTPA/Porn Watching Fee' Bills In Several State Legislatures
 Virginia House Bill 1592 would impose idiotic 'porn watching fee' to prevent human trafficking - Mike South on EFF Fights HTPA/Porn Watching Fee' Bills In Several State Legislatures
 VPN time: Corrupt, Muslim-dominated Indonesia blocks Tumblr over porn - Mike South on OUTRAGED MUSLIMS' OH MY! From My Buddy Neal Boortz
 33 Rocks on With friends like Adriana Chechik, who needs enemies.
 Golden Harvey Weinstein 'Casting Couch' Statute Erected in Hollywood In Advance of Tonight's Academy Awards - Mike South on Harvey Weinstein, Miramax Culture and The Porn Connection

He is an employee of the anti-pornography organization The Reward Foundation, which is where the proceeds of his book sales go (his website claims "donated to charity", but it directly profits him).

Claims on YourBrainOnPorn that he does not profit from book

Admits book proceeds go to The Reward Foundation

Admits he works for The Reward Foundation

Strain W. Park¹, Gary Wilson², Jonathan Berger³, Matthew Christman³, Bryn Reisa⁴, Frank Bishop⁴, Warren R. Klam⁴ and Andrew R. Doan^{1,5}

¹ Right Surgeon, Fleet Logistics Support Squadron 44, Naval Air Station Miramar, San Diego, CA 92161, USA; Email: parkr1@midmail.net

² The Reward Foundation, 3 Rose Street, Edinburgh EH2 2PR, Scotland, UK; G.Wilson@rewardfoundation.org

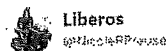
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KEYNOTES
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Gary Wilson
 Keynote Speaker Videos on Trend Hunter
 Website Host, Physiology Professor, Neuroscientist
 The lectures by Gary Wilson focus on neuroscience discoveries. Gary applies the concepts of brain plasticity to all of the speakers he delivers. Many former addicts have found a cure, reversed their symptoms and reached a new level of happiness!



Liberos

@Liberos1990

Replying to @Liberos1990: ...

Scientists (who have to disclose conflicts with every publication) are biased but this guy, fired before he could even lead an undergrad lab, paid-off by an anti-porn org has the inside track. Right.



What do you think about your brain on porn movement?

Nicole Prause's answer: 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...

4 MAY 2019

11



Liberos
@NicoleRPrause

Follow

Replying to @primaipoly @parallaxoptics @TGSyndrome

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.



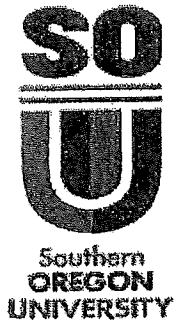
Journal corrects, but will not retract, controversial paper on internet porn

Dismissing concerns of the Committee on Publication Ethics and extensive allegations of misconduct, a journal has corrected, but is refusing to retract, a 2016...
retractionwatch.com

2:52 PM · 25 Feb 2019

3 Likes





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,

A handwritten signature in black ink, appearing to be "AL".

Human Resources Services

SOUTHERN OREGON UNIVERSITY PAYROLL/BUDGET STATUS CHANGE AND/OR REQUEST FOR EMPLOYMENT CONTRACT CHANGE <i>940098304</i>							
1. EMPLOYEE NAME: <i>GARY WILSON</i>		SSN: <i>[REDACTED]</i>		Employee Category: <i>U.C.</i>			
REASON FOR ACTION		<input type="checkbox"/> Reclasse, <input type="checkbox"/> Equity Adjustment, <input type="checkbox"/> Demotion, <input type="checkbox"/> Reassignment, <input type="checkbox"/> Transfer, <input checked="" type="checkbox"/> Other <i>Terminate</i> <input type="checkbox"/> Work Out of Class, <input type="checkbox"/> Lead Work, <input type="checkbox"/> Special Merit, <input type="checkbox"/> Reorganize (add/drop FTE), <input type="checkbox"/> Change Status					
CHANGE IN:		FROM			TO		
2. DEPARTMENT					<i>Biology</i>		
3. CLASS TYPE OR POSITION TITLE							
4. POSITION No.		<i>FRTBEO</i>					
5. APP'T. TYPE		<input type="checkbox"/> Full-time <input type="checkbox"/> Part-time FTE During Term			<input type="checkbox"/> Full-time <input type="checkbox"/> Part-time FTE During Term		
6. App'l. Term		Mos <input type="checkbox"/> 9 Mos <input type="checkbox"/> 9.5 Mos <input type="checkbox"/> 10 Mos <input type="checkbox"/> 12 Mos			Mos <input type="checkbox"/> 9 Mos <input type="checkbox"/> 9.5 Mos <input type="checkbox"/> 10 Mos <input type="checkbox"/> 12 Mos		
7. App'l. Dates		From / / To / /			From / / To / /		
8. RATE OF PAY During App'l. Term/Dates		MONTHLY ANNUALLY HOURLY		App'l	MONTHLY ANNUALLY HOURLY		App'l
		\$ \$ \$		\$	\$ \$ \$		\$
9. BMP CATEGORY		<input type="checkbox"/> Faculty, <input type="checkbox"/> Administrative Faculty <input type="checkbox"/> Administrative Professional, <input type="checkbox"/> Classified			<input type="checkbox"/> Faculty, <input type="checkbox"/> Administrative Faculty <input type="checkbox"/> Administrative Professional, <input type="checkbox"/> Classified		
10. ACADEMIC RANK							
11. REPRESENTATION							
12. CHANGE CONTRACT		<input type="checkbox"/> Fixed term (Yrs) Renewable; <input type="checkbox"/> Fixed term non-renewable			<input type="checkbox"/> Fixed term (Yrs) Renewable; <input type="checkbox"/> Fixed term non-renewable <input type="checkbox"/> Terminal, One-Year Contract		<input type="checkbox"/> Indefinite Tenure Provost Initials:
POSITION BUDGET CHANGE DATA							
	FROM	FTE %	TO	FTE %	EFFECTIVE	AMOUNT	
13. INDEX CODE							
14. INDEX CODE							
15. INDEX CODE							
16. PAY STATUS CHANGE TO: (check all that apply and attach supporting documents as needed)							
RESIGN []	LWOP []	MLA []	SEARCH & RESCUE []	OTHER []	FROM Date EFFECTIVE	PAYROLL USE ONLY: Benefit Change TO: Eligible [] TO: Not Eligible []	
RETIRE []	TERMINATE []	BOUNCE LEAVE []	MILITARY []	JURY DUTY []	TO Date EFFECTIVE <i>10/31/10</i>	EFFECTIVE [] / [] / [] Benefit Initials: _____	
COMMENTS: <i>Gary has a health issue that prevents him from finishing the term.</i>							
APPROVALS							
17. REQUESTED BY: DEPARTMENT <i>Karl Stone</i>						DATE: <i>11-3-10</i>	
18. AUTHORIZED BY DEAN/DIR: <i>Alvin Jensen</i>						DATE: <i>11-4-10</i>	
19. APPROVED BY HUMAN RESOURCES: <i>[Signature]</i>						DATE: <i>11-8-10</i>	
20. APPROVED BY BUDGET: <i>C. Briggs</i>						DATE: <i>11-10-10</i>	
21. APPROVED VICE PRESIDENT:						DATE:	
22. APPROVED PROVOST: <i>[Signature]</i>				date <i>10/10/10</i>	APPROVED PRESIDENT: <i>[Signature]</i>		date
COPY ALL SIGNATORIES, PLUS BENEFITS AND PAYROLL OFFICES. *For all faculty positions (all categories), only unclassified positions in Academic Affairs							
**NOTE: Unclassified positions only							
REVISED: January 30, 1999 - See reverse side for instructions on completing form							

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*



Liberos

@NicoleRPrause

Follow

Replying to @DrMParada @DrDavidLey @Kristen_Mark

A talk at #ESSM19 was removed for fraud making these exact claims, gave false credentials. Who was speaker? Definitely, none of this has ever been shown @NatRevUrol

4:06 PM · 16 Feb 2019



1



Tweet your reply



Liberos @NicoleRPrause · 3h

Replying to @NicoleRPrause @DrMParada and 3 others

Good catch @DrMParada. Photos show the evidence presented was a paper containing no data, recommended for retraction by COPE due to fraud (no editors, undisclosed COI, no consent, etc)



Journal corrects, but will not retract, controversial paper on internet ...

Dismissing concerns of the Committee on Publication Ethics and extensive allegations of misconduct, a journal has corrected, but is refusing to retrac...
retractionwatch.com



1

2





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

Like · 1h



David Ley David Hersh awwwww.

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





Liberos @NicoleRPrause · Mar 11

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.

<https://www.quora.com/wilson/Gary-Wilson-52809>

Quora

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



Gary Wilson

Author of "Your Brain on Porn": Anatomy/physiology teacher

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...



Eric Schrimshaw @EricSchrimshaw · 17h

This is so crazy. Not only does he publish in journals, but he managed to get himself a slot to present this stuff at IASR in Charleston in 2017. I totally remember meeting him there.

3

1

12



Michael Seto @MCSeto · 16h

Worth sharing to the sex research conferences

2

1

7



Liberos

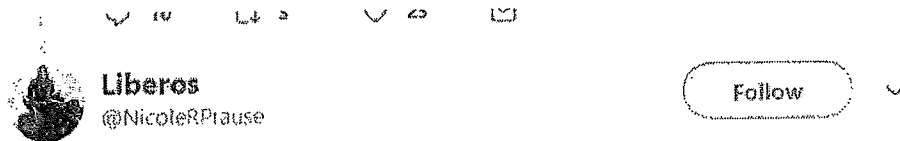
@NicoleRPrause

Follow

Replying to @MCSeto @EricSchrimshaw @DrDavidLey

There is at least one other who gave fake credentials to get a talk, but he was caught and disinvited. I know he already tried again (no invite). Should we start a list?

5:01 PM · 1 Mar 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.

5:22 PM · 8 Apr 2018

1 Like



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



On Monday, 25-09-2017 at 19:52 gary wilson wrote:

Dear Ms. Gles,

RE: World Meeting on Sexual Medicine Invitation

I apologize for my tardy reply to your kind letter of invitation. I received my first notice of it today.

In principle I am interested in attending and delivering a talk at the World Meeting on Sexual Medicine. Your suggestion of a talk entitled "The Great Porn Experiment (Revisited)" is a good one as much new research has come out since my original TEDx talk ("The Great Porn Experiment") was delivered in early 2012. There are now multiple studies on porn users themselves supporting the points made in the talk.

However, given your audience, I wonder if a version of a talk I recently gave in Mexico to a men's sexual health consortium might be a better fit. It was called, "Porn-Induced Sexual Dysfunctions." It focuses on the startling phenomena of rising sexual dysfunctions in men under 40, recent research on the subject, and what men on porn recovery forums are reporting. Do you think this talk would be more useful to your audience?

I have read the CME disclosure form and signing it will not pose a problem. However, I want to clarify that I am not a "doctor." My bio is attached. If my lack of formal credential presents a problem on your end due to CME requirements, I fully understand.

Best regards,

Gary Wilson

From: info- [REDACTED] on behalf of ISSM Executive Office - World Meeting on Sexual Medicine

Sent: Tuesday, September 26, 2017 12:29 AM

To: gary wilson

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

Dear Mr. Wilson,

On behalf of the scientific chairs I would like to inform you that they like your suggestion to give the talk "Porn-Induced Sexual Dysfunctions."

It is not a problem at all that you are not a physician.

Can you please confirm that you officially accept the invitation to give the lecture: Porn-Induced Sexual Dysfunctions.

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: info@wmsm.org
Web: www.issmessm2018.org





Liberos

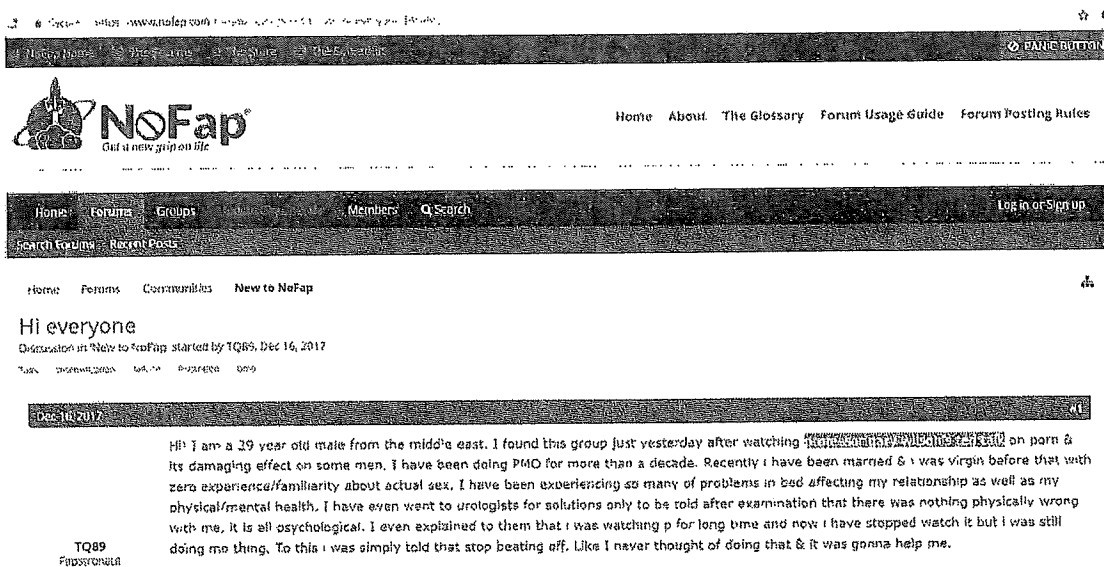
@NicoleRPrause

Follow

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.



12:23 PM - 28 Oct 2018





Laila Mickelwait @LailaMickelwait · 21h

Thanks for your contribution Gary. You have studied these issues so thoroughly and your expertise in this area is truly unmatched. I'm glad those following this thread will be properly educated.



2



3



Liberos

@NicoleRPrause

Follow

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.

ause site: www.yourbrainonporn.com

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of 82,100 results (5:44 seconds)

cole Prause's Unethical Harassment and ... - Your Brain On Porn
<https://www.yourbrainonporn.com/.../nicole-prauses-unethical-harassment-and-defam...>
 ny months later when Wilson wrote UCLA concerning Prause's libelous PDF (below), UCLA e
 I SPAN Lab was Prause's site, and not on UCLA...

cole Prause's Unethical Harassment and ... - Your Brain On Porn
<https://www.yourbrainonporn.com/nicole-prauses-pdf-her-span-lab-website>
 . 17, 2015 - Many months later when Wilson wrote UCLA concerning Prause's libelous PDF (below), UCLA e
 .A stated that SPAN Lab was Prause's site, and not ...

delous Claim that Gary Wilson Was Fired ... - Your Brain On Porn
<https://www.yourbrainonporn.com/.../libelous-claim-that-gary-wilson-was-fired-marc...>
 : 22 2018 Dr Nicole Prause prepared a libelous blog piece, which she posted on an adult n
 site. It was removed after Wilson tweeted this

itiques of Questionable & Misleading Studies ... - Your Brain On Poi
<https://www.yourbrainonporn.com/.../critiques-of-questionable-debunking-propagand...>

9:42 AM - 24 Feb 2019

lity | TIME
 EGOTECpage/3
 ainers do have ar
 it Southern Orego



Laila Mickelwait @LailaMickelwait · 8h

A nugget for those trying to claim the proliferation of porn somehow reduces sexual assault, which is the most ridiculous argument I have ever encountered and flies in the face of all credible evidence.

Gary Wilson @YourBrainOnPorn

Replying to @YourBrainOnPorn @lolk101 and 2 others

This came out yesterday - "48% of Female Undergrads at Duke Say They Were Sexually Assaulted While Enrolled, Up Sharply From 2016" chronicle.com/article/48-of-...



2



8



27



Liberos

@NicoleRPrause

Follow

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.

ause site: www.yourbrainonporn.com

News Videos Shopping Images More Settings

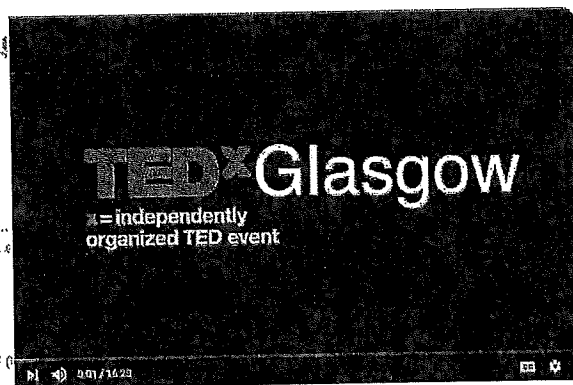
82,100 results (0.44 seconds)

cole Prause's Unethical Harassment and ... - Your Brain On Porn
<https://www.yourbrainonporn.com/.../nicole-prause-unethical-harassment-and-defam...>
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 t SPAN Lab was Prause's site, and not on UCLA .

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<https://www.yourbrainonporn.com/nicole-prause-pdf-her-span-lab-website>
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<https://www.yourbrainonporn.com/.../libelous-claim-that-gary-wilson-was-fired-marc...>
 23 2018 - Dr. Nicole Prause prepared a libelous blog piece, which she posted on an adult i
 ssite, it was removed after Wilson tweeted this.

itiques of Questionable & Misleading Studies ... - Your Brain On Poi
<https://www.yourbrainonporn.com/.../critiques-of-questionable-debunking-propagand...>



eat porn experiment | Gary Wilson | TEDxGlasgow

TEDx Talks
 Presented in association with TED

NOTE FROM TED: This talk contains several assertions about masochism that are not supported by academically respected studies of medicine and psychology. Please do not look to this talk for medical advice.



Parallax Optics @parallaxoptics · 49m

I'm liking him more already...



Liberos

@NicoleRPrause

Follow

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 site: www.yourbrainonporn.com



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Nicole Prause's Unethical Harassment and ... - Your Brain On Porn

<https://www.yourbrainonporn.com/.../nicole-prauses-unethical-harassment-and-defam...>

Many months later when Wilson wrote UCLA concerning Prause's libelous PDF (below), UCLA stated that SPAN Lab was Prause's site, and not on UCLA ...

Nicole Prause's Unethical Harassment and ... - Your Brain On Porn

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

Feb 17, 2015 - Many months later when Wilson wrote UCLA concerning Prause's libelous PDF (below), UCLA stated that SPAN Lab was Prause's site, and not ...

Libelous Claim that Gary Wilson Was Fired ... - Your Brain On Porn

<https://www.yourbrainonporn.com/.../libelous-claim-that-gary-wilson-was-fired-marc...>

Dec 22, 2018 - Dr. Nicole Prause prepared a libelous blog piece, which she posted on an adult industry website. It was removed after Wilson tweeted this.

Critiques of Questionable & Misleading Studies ... - Your Brain On Porn

<https://www.yourbrainonporn.com/.../critiques-of-questionable-debunking-propagand...>



Nikky Prause reviewed Fight the New Drug —

May 29 at 11:16pm ·

This group is well-known for refusing science inconsistent with their viewpoints. I have twice had to ask them to remove posts from their "expert" who actually has two police and two FBI reports for stalking me. FTND has directly supported sexism and harassment of scientists in order to further their agenda.

Finally, their financials are public record and show that they pay to place news stories and for spokespersons. This is a religious org masquerading (see Daily Beast article for LDS org) as a public health concern. Consequently, their "neuroscience" is simply false. They work with no neuroscientists, only one self-published neurosurgeon, which is a different field.

You can work on issues related to adult films without fraudulent credentials. FTND chose the dishonest path.



Like



Comment



Share



Nicole Prause

met with WUSTL PD

Tue, Aug 9, 2016 at 4:57 PM

To: I

<sc1

Cc:

Hello all,

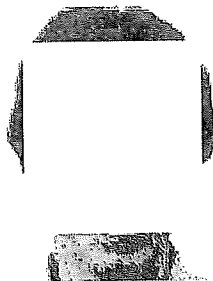
WUPD Patrolman Tim Dennis came to my house to speak with me. Just left. I gave him Nikky's picture of the stalker, Gary Wilson, a copy of our 4-day program, Nikky's emails and phone number and my business card. He said he expected the department would have some plainclothes detectives around the school Thursday. Nikky speaks Thursday from 1 PM-3:30 PM. Her presentation is "How Science Falsified The Sex Addiction Model and Is Advancing Ineffective Treatments".

After Officer Dennis reports to his Chief and others, he said someone with a higher rank than his would probably call me. I do not want to activate our other participants, so whatever we can do to be subtle while safe is what I hope for.

Siomari, I am happy for you to call WUPD and deal with this for us and I appreciate your help.

I googled Gary Wilson and see he is the author of Your brain on porn and is in a cyber debate with Nicole and others who oppose his views.

Best,



Gary Wilson

Susan Stiritz



GaryWilson Stalker

Comment on your video: Erectile Dysfunction and Porn: Part 2

07/26/13

Wow, the cover figure is even incorrect. You should know that Gary Wilson is not a "physiologist" or "science teacher". He didn't go past high school and much of this video is just incorrect information. He actually has a police report on file for stalking a woman. He put her photo on a porn website, of all things! The scientific community makes a laughing stock out of Gary Wilson on a regular basis.



Erectile Dysfunction and Porn: Part 2
Science teacher Gary Wilson explains the physiology of erections, how overstimulation via today's internet porn can create erectile dysfunction--even in young men, and how others have recovered. For more information visit our non-commercial, non-r...

See all comments

Delete



GaryWilson Stalker

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

07/26/13

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

- Author: Lindsay McKinnon
Comment: Gary and his partner Maria have been a fabulous help to me in writing my book to help partners of porn addicts: (You Want Me To Do WHAT With That?) The Life Expectancy of a Relationship With a Porn Addict. I cannot recommend their site highly enough. If you want common sense and great advice, go to Your Brain on Porn!
- Author: GaryWilson IsAFraud
Comment: "Physiology teacher"?! Ha! Gary Wilson is a part-time massage therapist in Ashland Oregon who barely made it out of high school. He is documented all over the place as misinterpreting science and is currently charged with stalking a female scientist (put her photo on a porn website). What a fraud and know-nothing looking for his 15 seconds.
- Author: SlimDadDude504
Comment: you mad????



Alexander Rhodes @AlexanderRhodes · 8 Jul 2016

@NicoleRPrause @DrDavidLey For evidence, what about all of these studies that @YourBrainOnPorn links to? yourbrainonporn.com/studies-report...

1 1 1



Liberos

@NicoleRPrause

Follow

@AlexanderRhodes @DrDavidLey You mean the unemployed blogger who has a police report threatening my lab and no-contact order for harassment?

RETWEET

1

LIKE

1



2:11 PM - 8 Jul 2016 from Los Angeles, CA

1 1 1

1 1 1

1 1 1



Liberos

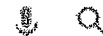
@NicoleRPrause

Follow

Replying to @GaveUpPorn @ConnerHabib @UtahGov

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.

prause site: www.yourbrainonporn.com



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Nicole Prause's Unethical Harassment and ... - Your Brain On Porn

<https://www.yourbrainonporn.com/.../nicole-prauses-unethical-harassment-and-defam...>

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Critiques of Questionable & Misleading Studies ... - Your Brain On Porn

<https://www.yourbrainonporn.com/.../critiques-of-questionable-debunking-propagand...>

10:28 AM - 10 Jan 2019



Liberos

@NicoleRPrause

Follow

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.

use site: www.yourbrainonporn.com

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67101 - 67104 - 67105 - 67106

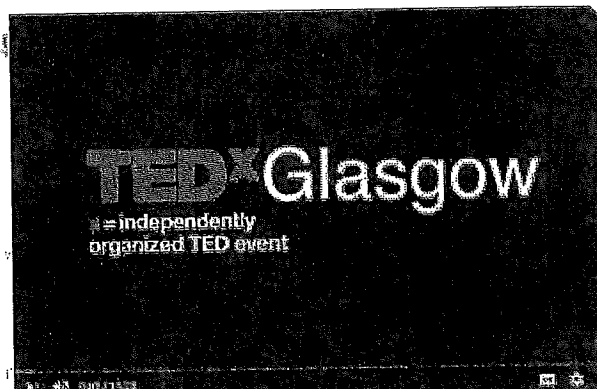
cole Prause's Unethical Harassment and ... - Your Brain On Porn
<http://www.yourbrainonporn.com/cole-prause-unethical-harassment-and-delam>
 re on your site when W. wrote UCLA concerning Prause's abusive PDF below. UCLA
 t SPAN on when Prause's site, and out on UCLA

cole Prause's Unethical Harassment and ... - Your Brain On Porn
 re www.yourbrainonporn.com/cole-prause-pd-her-ear-late-website
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 , A noted that SPAN on when Prause's site, and out

relous Claim that Gary Wilson Was Fired ... - Your Brain On Porn
<http://www.yourbrainonporn.com/relous-claim-that-gary-wilson-was-fired-marc>
 22, 2016. Dr. Nicole Prause prepared a hilarious stoppage, which she posted on an adult
 site. I was not told after Wilson fired her

Itiques of Questionable & Misleading Studies ... - Your Brain On Porn
<http://www.yourbrainonporn.com/Itiques-of-questionable-debunking-propagand>

9:24 AM - 24 Feb 2019



subject experience | Gary Wilson | TEDxGlasgow

Slide Index

an to social FBI. The FBI cannot see if someone about a statement that you had experienced
 as a woman, it is not a crime. The FBI cannot see if someone about a statement that you had experienced
 as a woman, it is not a crime.

On Sat, Mar 21, 2015 at 6:17 AM, Janey Wilson <janeywilson68@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 <janeywilson68@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 <janeywilson68@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

From: Nikky [REDACTED]@gmail.com>
Sent: 03 November 2016 21:27
To: Dan Hind; [REDACTED]@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: www.span-lab.com
Liberos LLC: www.liberoscenter.com
[REDACTED]

From: Jamie Kendall <info@jamiendall.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.jamiendall.com

Begin forwarded message:

From: Nikky [REDACTED]@gmail.com>
Subject: Fwd: Book financial beneficiary
Date: 3 November 2016 at 21:31:24 GMT
To: info@jamiendall.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.
Research: www.span-lab.com
Liberos LLC: www.liberoscenter.com
[REDACTED]

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

From: **Janey Wilson** <janeywilson68@gmail.com>

Date: 25 March 2015 at 04:09

Subject: Concern about for-profit posing as non-profit at Melting Pot

To: mohammad@themeltingpotedinburgh.org.uk

Dear Mohammad Abushaaban,

I write out of concern for The Reward Foundation housed at The Melting Pot, which is posing as a non-profit. 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

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Company No: SC291663

----- 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.

J

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 whistleblower 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.

J

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.

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.

----- 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>

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J

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 →

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/}}</ref>. 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.

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 DISAGREE 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.

Darryl Mead 2018-Jun-13 - 22:11 UTC

AGREE 0 DISAGREE SPAM REMOVE

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 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 1 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/tmmdce/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 with animals are. Gay people are essentially sex addicts."

etc.

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

Nicole Prause 2018 Jun 14 16:10 UTC

REPLY AGREE -1 DISAGREE SPAM REMOVE

[add new comment](#)

EXHIBIT 2

Exhibit 11

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

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

DECLARATION OF 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, 2019 Dr. Prause attempted to trademark (http://tsdr.uspto.gov/#caseNumber=88281342&caseType=SERIAL_NO&searchType=statusSearch) 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 be managed by Dr. Prause (@BrainOnPorn) commenced a smear campaign against me, claiming falsely that I had hundreds of URLs of Mormon-themed pornography on my website (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".

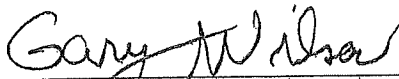
I declare under penalty of perjury that the foregoing is true and correct. Executed on 22 January, 2020.

Gary Wilson

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



Gary Wilson

EXHIBIT 3

regarding yourbrainonporn.com



support@linode.com

Fri 1/31/2020 3:02 PM

You »



Support Ticket 13304252 Linode 'ybop-prod (linode14376974)' has been updated by jackley:

Hello Gary,

My apologies if the tone of our prior communication did not convey our sympathy to your position. As in the prior instances of our interactions regarding Ms. Prause, we were merely advising you of the existence of Ms. Prause's possible claims against your website, and to confirm that you had not published Ms. Prause's home address or telephone number.

To this end, Linode has invested considerable resources in doing our due diligence in the instant matter (as was the case with Ms. Prause's previous issues). We take all abuse claims seriously, though as advocates of all our customers, do our best to discourage frivolous reports.

At this time, Ms. Prause has provided us with no actionable requests, so Linode will not be taking any action.

Linode is legally required to forward claims regarding content to our customers, but in doing so, we should have also advised you as to Linode's behind the scenes efforts.

Could you please provide any correspondence that led to your message to me?

We are reviewing your request for correspondence on this matter and will provide an update early next week

Please let us know if you have any questions.

Thank you,

• Jim

EXHIBIT 4

<https://twitter.com/NicoleRPrause/status/1226927887678201856>



Liberos @NicoleRPrause · Feb 10

CA Office of Attorney General & LAPD are in loop to get my full address off @Linode website of Scary Gary. Direct links were sent to @Linode January 3, 2020 & they refused to remove my address.

Write @Linode to follow CA anti-stalking law 6208.1

liberoscenter.com/contact/

@McLNeuro



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7



Liberos @NicoleRPrause · Feb 10

I have not posted my actual address anywhere online in over 5 years because of stalking. Yes, I am aware he thinks he is circulating my address from another account. It is a false address posted because I knew someday he would do something like this.

Stalkers always escalate.



3



1



6



EXHIBIT 5

What a Google search reveals:

www.linkedin.com › [nprause](#) ▼

Nicole Prause, Ph.D. - Affiliate - University of Pittsburgh ...

View **Nicole Prause**, Ph.D.'s profile on LinkedIn, the world's largest professional community.

Nicole has 9 jobs listed on their profile. ... 7080 **Hollywood Blvd.**

www.ncbi.nlm.nih.gov › [pubmed](#)

Porn Is for Masturbation. - NCBI

by N Prause - 2019 - Cited by 4 - Related articles

Mar 7, 2019 - Porn Is for Masturbation. Prause N(1). Author information: (1), 7083 **Hollywood Blvd.**, Los Angeles, CA, 90028, USA. nicole.prause@gmail.com.

govtribe.com › [vendors](#) › [prause-nicole-liberos-79eg4](#)

Prause, Nicole - Liberos LLC - (DBA Liberos) - GovTribe

7046 **Hollywood Blvd** Apt 403, Los Angeles, CA, 90028, USA 1010 Palm Ave Apt 309, West Hollywood, CA, 90069, USA Changed Address ...

www.beenverified.com › [People Search](#) › [Potts to Prim](#) › [Praught to Pray](#)

Nicole Prause Phone Number, House Address, Email & More ...

We found 3 records in 9 states for **Nicole Prause** in the US. ... 1650 Veteran Ave Apt 305, Los Angeles, CA; 7046 **Hollywood Blvd** Apt 403, Los Angeles, CA; 915 ...

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GARY WILSON
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT, FAMILY LAW**
10

11 NICOLE PRAUSE,

12 Petitioner,

13 v.

14 GARY WILSON,

15 Respondent.
16
17
18
19

Case No.: 20STR001022

**DECLARATION OF [REDACTED] IN
SUPPORT OF THE OPPOSITION OF GARY
WILSON TO THE PETITIONER'S
REQUEST FOR A CIVIL HARASSMENT
RESTRAINING ORDER**

Date: March 5, 2020
Time: 8:30 a.m.
Dept.: 22

20 I, [REDACTED] declare and state as follows:

21 1. I am the son of Gary Wilson. I am over the age of 18 and if called upon to testify to
22 the matters stated herein, I could and would do so competently of my own personal knowledge.

23 2. I make this declaration in support of my Father's opposition to the Request for Civil
24 Harassment Restraining Orders ("Request") filed by Nicole Prause ("Prause").

25 3. I have reviewed the Request. It attaches two (2) photos from my private Facebook
26 profile taken in 2014 and 2015, which Prause contends depict my Father and I holding guns. These
27 two photos are attached hereto for reference as **Exhibits A and B**. Prause is wrong. My Father is
28 not in either photo.

1 4. **Exhibit A** was taken in early 2014. I was working for Palantir Technologies on a
2 project with the California Department of Justice. As part of this project, I worked with the
3 Sacramento County Sheriff Department's Gang Suppression Unit. We did police ride-alongs,
4 trained the officers on our software, and built new features with them to help with their job. On the
5 day the photo was taken, we were at a secure facility which contained a weapons locker. At the end
6 of the day, the officers offered to let us take "action shots" with their unloaded firearms. The whole
7 team took advantage of the opportunity. The other person in this photo was an intern at Palantir. The
8 person taking the photo was a law enforcement officer who was a member of the gang suppression
9 unit. We returned the firearms after the photo shoot.

10 5. **Exhibit B** is a photo of me taken at a shooting range in 2015 by a friend from Palantir
11 who was a gun collector. He offered to take me and two interns to a shooting range and let us shoot
12 his guns. The range was about a 45 minute drive outside of Palo Alto, California. He taught me and
13 the interns proper gun safety at the firing range. After a couple hours of shooting, he took his guns
14 back and we all went home. I haven't seen him since 2015.

15 6. I have never met or communicated with Prause in any way. I have never threatened
16 Prause in any way. I do not own any firearms. To my knowledge, my father does not own any
17 firearms.

18 I declare under penalty of perjury under the laws of the State of California that the foregoing
19 is true and correct and of my own personal knowledge. Executed this 28 day of February 2020 at
20 Portland, Oregon.

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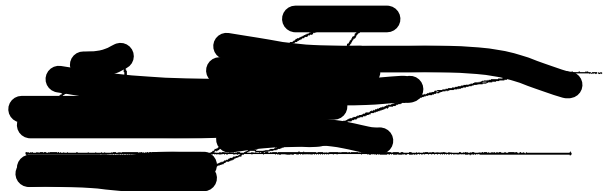
A large, irregular black redaction mark covering the signature area, obscuring the name and any handwritten notes.

EXHIBIT A

EXHIBIT A

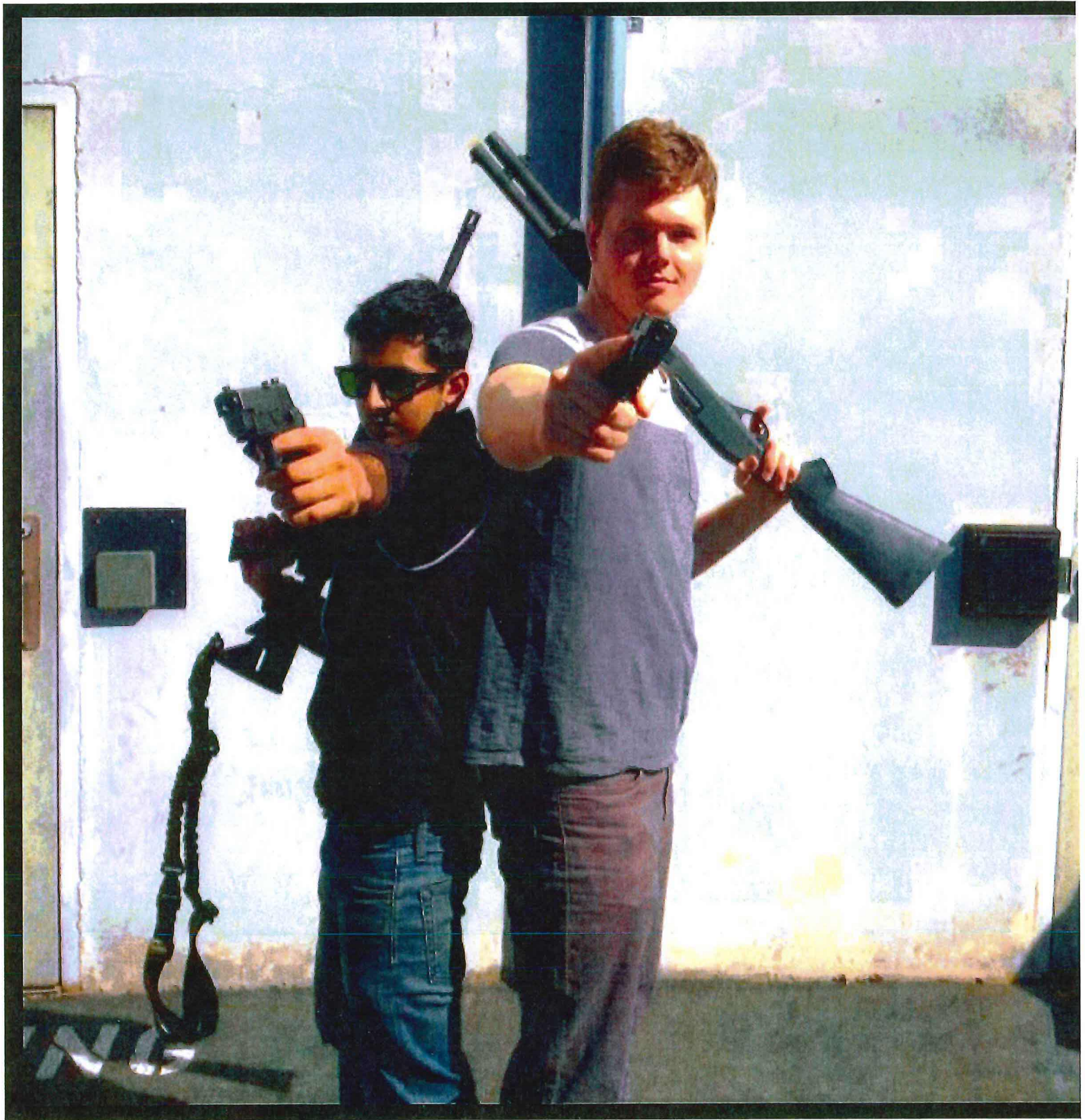
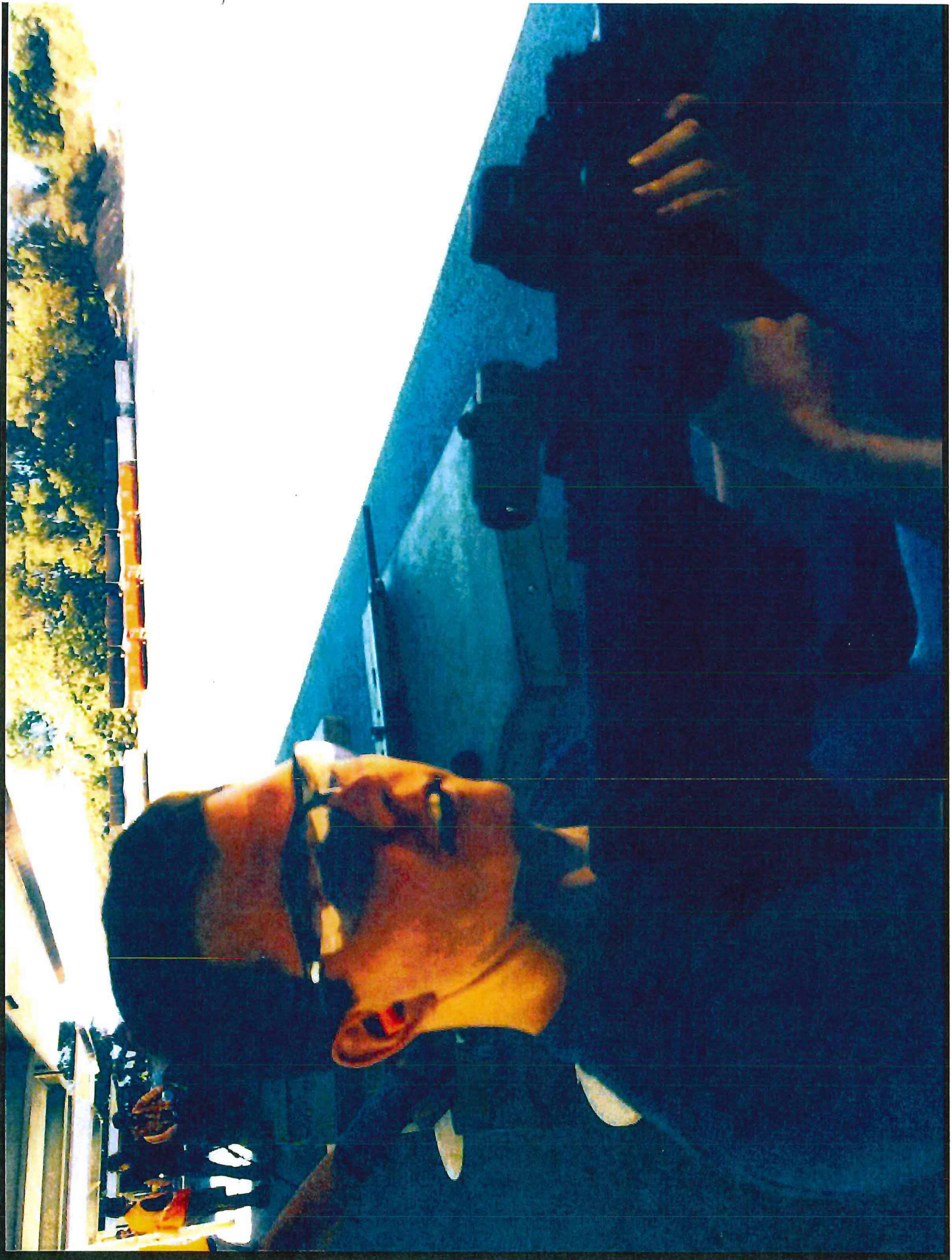


EXHIBIT B

EXHIBIT B



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PROOF OF SERVICE
Nicole Prause v. Gary Wilson
LASC Case No. 20STR001022

I am employed in the County of Orange, State of California, over the age of eighteen years, and not a party to the within action. My business address is SONGSTAD RANDALL COFFEE & HUMPHREY LLP, 3200 Park Center Drive, Suite 950, Costa Mesa, California 92626.

On the date set forth below, I served the foregoing copy of the document(s) described as **RESPONSE TO REQUEST FOR CIVIL HARASSMENT RESTRAINING ORDERS** as follows:

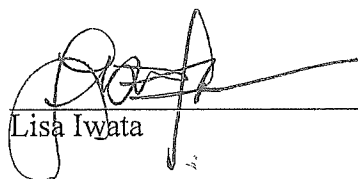
☒ **By Mail:** By placing the document(s) listed above in sealed envelope(s) with postage thereon fully prepaid for collection and mailing in Costa Mesa, California, addressed as set forth below, or as stated on the attached service list.

Nicole Prause
Post Office Box 1318
Sacramento, CA 95812

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **March 2, 2020**, at Costa Mesa, California.



Lisa Iwata

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