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	
and) Electronically Filed)
LIBEROS LLC)
Defendants)

DECLARATION OF PLAINTIFF ALEXANDER RHODES

- My name is Alexander Rhodes. I am over eighteen (18) years of age, competent to make this declaration, and not disqualified by law from doing so. I have direct, personal knowledge of the facts asserted in this declaration.
- I am a lawful resident of the Greater Pittsburgh Area and have publicized the fact that I am from Pittsburgh in several of my interviews. My website openly lists a Pittsburgh mailing address. See Exhibit A.
- This lawsuit arises out of numerous false and defamatory communications by Defendant Nicole Prause which are about me personally.
- 4) Defendant Prause's defamatory communications about me include numerous false statements that I personally engage in criminal behavior, including that I have threatened to rape women, that I'm stalking her, that I'm cyber-stalking her, that I have been reported to the FBI for stalking, that I have been reported to the FBI for cyber-stalking, that I have been reported to the FBI for computer intrusion, that I have been reported to the FBI for

Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 2 of 64

criminal threats, that I harass her, and that I am engaged in fraud. Additionally, Defendant Prause has repeatedly claimed that she has restraining and no-contact orders against me.

- 5) Defendant Prause's defamation campaign has been obsessive and significantly disruptive to my life and career. It is challenging to document the sheer amount of defamation and misinformation that Defendant Prause has spread about me and since October 2018, dealing with Defendant Prause's escalating defamation campaign has been a full-time job in itself.
- 6) In addition to repeatedly claiming that I am personally involved in criminal behavior, Defendant Prause has endeavored to personally smear me as a misogynist, affiliated with a hate group, and a sympathizer of anti-Semitism.
- 7) I am not a misogynist nor an anti-Semite. Indeed, while I am not a religious person, I am ethnically Jewish. In 2010, I went on a Taglit-Birthright Israel trip with a group of other young Jewish adults exploring the country for the first time. Since then, I have been back to Israel two more times so far. See Exhibit B.
- 8) I have never met Defendant Prause, have never seen Defendant Prause, and have never even had a private correspondence with Defendant Prause. I believe that Defendant Prause has targeted me because I run a website that raises awareness about porn addiction.
- 9) After this lawsuit was filed, Defendant Prause has continued to defame me personally with allegations of criminal conduct and trying to connect me with anti-Semites. Additionally, Defendant Prause has been spreading a lie that I sued her because I disagree with her research, attempting to falsely brand this lawsuit as a frivolous and vexatious attempt to stymie her research and free speech. See Exhibit C.

- 10) While I try to stay aware of the latest credible research in the field, I am not very familiar with Defendant Prause's research in particular. This lawsuit was not filed because of Defendant Prause's research, her criticism of the pornography addiction model, her accusations against other people in the field, or her pro-pornography advocacy. This lawsuit has nothing to do with the general debate of whether or not pornography can fit within the behavioral addiction model, but rather this lawsuit was filed in response to Defendant Prause orchestrating a defamation campaign targeting me and my website.
- 11) Upon information and belief, after this lawsuit was filed, Defendant Prause contacted a United Kingdom-based outlet ScramNews.com to relay false and defamatory information about me, who then republished defamatory statements concerning me personally. This forced me to retain another law firm in the United Kingdom at considerable expense. For example, the hit piece stated that "Rhodes is the founder of NoFap, a website that claims to help people with porn addiction, while Prause has researched porn addiction and claims that she has found no scientific basis for it. Rhodes has said this research is tantamount to defamation and is suing Prause." See Exhibit D.
- 12) After the lawsuit was filed, on November 11, 2019 at 11:12 am Eastern time, NoFap launched a crowdfund to help support the significant legal expenses that I have been incurring. See Exhibit E.
- 13) Before the crowdfund went live, Defendant Prause's attorneys were made aware that a crowdfund was going to go live later that morning.
- 14) After Defendant Prause's attorneys were alerted about the upcoming crowdfund, Defendant Prause started to claim on Twitter that the crowdfund resulted in her receiving death threats.

- 15) Before the crowdfund went live, a Twitter post (a "tweet") was made on the @NoFap Twitter account at 08:24 am saying that there would be an announcement in approximately two hours, at 10:24 am. However, ultimately the crowdfund launch was delayed until 11:12 am, which seems to have led to Defendant Prause claiming that the crowdfund led to death threats approximately 22 minutes too early. See Exhibit F.
- 16) Defendant Prause falsely attributed these alleged threats to me and the crowdfund, since she made the tweet complaining about the alleged death threats approximately 22 minutes before the crowdfund actually went live. Defendant Prause then made another tweet claiming a "second death threat" as a result of the crowdfund at approximately 11:07 am – approximately 5 minutes before the crowdfund went live. After claiming to be getting death threats as a result of the crowdfund before the crowdfund actually existed, upon information and belief, Defendant Prause continued to repeat similar accusations on Twitter, to the crowdfund software provider in an attempt to cut off the funding, and to news outlets. Ex. F.
- 17) Upon information and belief, Defendant Prause relayed false information to a Vice Media blogger who published an inaccurate hit piece "NoFap Founder Is Suing a Neuroscientist Who Thinks Masturbating Is Fine," resulting in widespread misinformation online about this case. The hit piece falsely frames this lawsuit as being filed due to disagreement with Defendant Prause's research and opinions about porn addiction. The hit piece also states that Defendant Prause "claimed that harassment and death threats from Rhodes' fans have escalated to the point that the FBI and local law enforcement are involved." See Exhibit G.
- 18) The Vice Media hit piece also quoted Defendant Prause's friend David Ley who works with xHamster/Stripchat, Max Bennet who is a vice president at xHamster/Stripchat, and

Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 5 of 64

Mike Stabile who is the communications director for the porn industry lobbying group the Free Speech Coalition.

- 19) It is my belief that Defendant Prause works with, coordinates with, communicates with, or otherwise engages with individuals within the porn industry to further cause harm to me, my website, and other victim witnesses in this case.
- 20) The author of the Vice Media hit piece included "All of this—the slippery nature of NoFap's founding principles, Prause getting harassed online—are typical when trying to understand the topic of groups like NoFap and No Nut November. Last year, Motherboard examined the origins of the anti-masturbation movement: Orgasm denial and control over one's own sex drive are key principles [sic] of historically fascist and white supremacist groups, including the Proud Boys and the Klu Klux Klan. (In 2016, Rhodes appeared on former Proud Boys leader Gavin McGinnes' [sic] podcast, and in 2018, denied knowing at the time that the Proud Boys was a white supremacist group.)" This hit piece leads readers to believe that Proud Boys existed at the time of the interview with Vice Media co-founder Gavin McInnes which is not true.
- 21) On October 27, 2018, Defendant Prause started to claim, from the Twitter account of Defendant Liberos LLC, that I am affiliated with a group known as the Proud Boys.
- 22) This defamatory attack began on October 27, 2018, the day of the Tree of Life synagogue mass shooting in Pittsburgh. See Exhibit H.
- 23) The Tree of Life mass shooting was carried out by a white nationalist extremist who espoused anti-Semitic views. Ex. H.
- 24) The Proud Boys are designated as a hate group by the Southern Poverty Law Center. See Exhibit I.

- 25) The Proud Boys are known for their far-right, white nationalist, and anti-Semitic views.Ex. I.
- 26) The Proud Boys group was created in September of 2016. Ex. I.
- 27) The Proud Boys group was founded by a Vice Media co-founder, Gavin McInnis. See Ex.I.
- 28) Vice Media is a digital media and broadcasting company. It is known for operating Vice magazine, Vice News, and other related brands. See Exhibit J.
- 29) I appeared on a podcast episode with Vice Media co-founder Gavin McInnis in April of 2016, which was prior to the creation of Proud Boys. Since the creation of Proud Boys in September 2016, I have not appeared on any further episodes of Vice Media co-founder Gavin McInnis' podcast, nor have I ever supported or defended the Proud Boys or any anti-Semitic organization.
- 30) I do not work with or communicate with Gavin McInnis and to the best of my knowledge, do not work with or communicate with any member, leader, or anyone affiliated with the Proud Boys or any designated hate group.
- 31) Gavin McInnis is a co-founder of the popular media organization Vice Media. Prior to founding the Proud Boys group, to the best of my knowledge, Gavin McInnis was best known for being a co-founder of Vice Media and a comedian. Gavin McInnis' affiliation with Vice Media is the reason that I agreed to appear on the podcast.
- 32) I appeared on the podcast to raise awareness about porn addiction since Gavin McInnis cofounded Vice Media and recently published a video discussing porn addiction. Upon information and belief, a cursory review reveals that other guests of Gavin McInnis'

Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 7 of 64

podcast include a wide variety of other non-political subject area experts, comedians, and personalities.

- 33) At the time of the podcast interview, I did not know that Vice Media co-founder Gavin McInnis would, at a later date, create the Proud Boys group.
- 34) Defendant Prause began these defamatory attacks to try and link me, a life-long Pittsburgh area resident, and NoFap LLC, a Pittsburgh business, to the horrendous anti-Semitic mass shooting that was carried out in Pittsburgh that day.
- 35) In response to another person in my field criticizing her and David Ley choosing the day of the Tree of Life mass shooting to paint "anyone who helps others recover from #pornaddiction as a supporter of violent anti-Semitism and racist hatred," Defendant Prause described the shooting day as "the perfect time" and that "hate from NoFap will lead someone to attack us: and it will be on you. Stop this now." See Exhibit K.
- 36) Upon information and belief, Defendant Prause regularly works with and coordinates with David Ley to further cause harm to me, my website, and other victim witnesses mentioned in this case.
- 37) Like most Pittsburgh area community members of right mind, I was already upset as a result of the deadly attack on the Tree of Life congregation. Falsely accusing a life-long Pittsburgh area resident of being affiliated with anti-Semitic groups on the day of the Tree of Life mass shooting caused me considerable distress. Furthermore, I spent years of my childhood living in the Squirrel Hill neighborhood where the mass shooting took place. While I am not religious, for a period of time in my childhood, I attended another synagogue about a mile away from the Tree of Life congregation.

- 38) On February 25, 2020, I was contacted by the Pennsylvania Department of State regarding a complaint received by the Pennsylvania Board of Psychology against me for the unlicensed practice of psychology. They reached out via email, postal mail, and postal certified mail. See Exhibit L.
- 39) While the Pennsylvania Department of State Bureau of Enforcement and Investigation cannot provide me with information about who submitted the report, this fits the pattern of Defendant Prause's actions directed towards numerous people in my field.
- 40) This report was filed on October 01, 2019, the day after a Twitter account believed to be run by Defendant Prause, @BrainOnPorn, tweeted about reporting me to the State Board in response to my appearance on *This is Life with Lisa Ling*, which was filmed in Pennsylvania. Defendant Prause's Twitter post replied to a photograph that Lisa Ling posted, captioned with "These guys were so so brave to share how exposure to porn at a young age-some were 8 years old-affected their minds, their bodies, how they look at women (and men) and how they perceive sex and relationships. <u>#ThisIsLife</u> SUNDAY 10PM @cnnorigseries" See Exhibit M.
- 41) Defendant Prause's Twitter post stated "Cool, so you'll posts Rhodes' license to provide such mental health treatments as a link right here, right? Right? Wait, he has NO training? And NO licensure? Yikes, should he be reported for practicing without a license?" Defendant Prause's Twitter post linked to the Pennsylvania Department of State website's instructions on how to file a complaint. Ex. M.
- 42) My appearance on *This is Life* was solely a discussion about pornography addiction and in no way indicated that I was offering psychological or counseling services to anyone. In fact, the show made it very clear that therapy was not being provided, but that we were

Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 9 of 64

hosting a round-table discussion about porn. Lisa Ling clearly stated at the beginning of the episode that "Alex is not a therapist. He's a fellow addict who struggled for almost 2/3rds of his life." Before the episode was filmed, all participants were emailed "Note that this is simply an event to discuss porn addiction among peers, not actual treatment for porn addiction, not medical advice, and not healthcare or mental healthcare. We strongly encourage everybody to consider seeing a porn addiction-literate therapist. NoFap has published advice on this page: https://www.nofap.com/articles/how-to-find-a-therapist/. If you want a referral or are wondering if you should contact a therapist, please let us know either in person or through email and we can put you in touch with a local therapist who can assist you." See Exhibit N.

- 43) Neither I, nor my company, have ever purported to offer any psychology or counseling services, and have made that abundantly clear on the website.
- 44) The website's User Agreement clearly states that "NoFap is not a mental healthcare provider. NoFap's team members cannot be expected to be trained or qualified to give mental health counseling or any kind of mental health care." Similar topics are clarified numerous times throughout the User Agreement. See selected User Agreement clauses, attached as Exhibit O.
- 45) On Monday, March 16, 2020, the investigator told me that while they cannot provide me with a hard copy of the report due to Pennsylvania Department of State policies, the report stated that I am "charging residents of Pennsylvania for treatments for compulsive sexual behavior" and that I "hold no appropriate training and no licensure" to do so. The complaint also states that I "described his providing treatments on CNN's Sunday [sic] to Lisa Ling."

- 46) I have never practiced or purported to practice psychology or provide mental healthcare treatments to residents of Pennsylvania without the appropriate licensure to do so.
- 47) The allegations in the Pennsylvania State Board of Psychology complaint are complete fabrications designed to harass and otherwise defame me.
- 48) I was told by the investigator that the Pennsylvania Department of State's Bureau of Enforcement and Investigation is obligated to investigate all complaints, regardless of if they're frivolous or not. As such, I am now in the middle of a mandatory investigative process, which has been stressful and time-consuming.
- 49) Further, I have been forced to engage another law firm who specializes in professional licensure defense and I am incurring significant legal fees to deal with these completely baseless allegations.
- 50) In addition, since initiating this action, Defendant Prause has threatened and initiated several SLAPP actions against identified witnesses, those who have shown support for me, and those who have reported about the lawsuit.
- 51) Defendant Prause has filed a defamation complaint in the Small Claims Court of Los Angeles County against Staci Sprout, a witness in this case. See Exhibit P.
- 52) Defendant Prause has threatened to a file defamation action against a Canadian publication, The Post Millennial, in response to an article that they published which reported about this lawsuit. See Exhibit Q.
- 53) Defendant Prause made a legal threat against the UCLA School of Law for making a tweet about The Post Millennial article, which led to them deleting the tweet. See Exhibit R.
- 54) Defendant Prause filed a restraining order request targeting Gary Wilson, a witness in this case. See Exhibit S.

- 55) Defendant Prause has legally threatened YouTube user Daniel Nadem in response to a video which expressed support of me and criticism of her, which led to him deleting his video. See Exhibit T.
- 56) A content creator named Rebecca Watson associated with the website SkepChick.org made a YouTube video about this lawsuit. On YouTube, Defendant Prause commented under Rebecca Watson's video with "Rebecca Watson failed to seek out the response to a first filing, which can say anything without basis. The filing made numerous fraudulent claims that Rebecca Watson now repeats" and "She sought no information whatsoever prior to attacking **this female scientist fighting serious stalking problems**" and "I watched the entire video and saved it to show the damages Rhodes is causing me for my countersuit against him. Extraordinary claims require extraordinary evidence. Had Watson reached out, she would have received all the supporting documentation and not promoted his defamation. [emphasis added]" See Exhibit U.
- 57) On Twitter, Defendant Prause repeatedly reached out to Rebecca Watson to relay false information. For example, on November 25, 2019, Defendant Prause posted "Are you serious? I'm easily accessible & you never reached out. We have already responded asserting 'truth', have excellent docs, & expect dismissal, but garbage like this will be all people see online" in response to Rebecca Watson's post about this lawsuit. In addition, Defendant Prause posted "I cannot use my mailbox or front door any more because of the stalking. I'm in an address protection program. [emphasis added]" Ex. U.
- 58) Defendant Prause continued making tweets, stating that **"The number 1 reason women** fear reporting is retaliation. It is so common to file fraudulent defamation vs. those

Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 12 of 64

who report harassment that CA actually has a law against it" and "I have police and FBI reports. LAPD has filed one subpoena already. [emphasis added]" Ex. U.

- 59) On February 18, 2020, Defendant Prause posted on Twitter "I found more #NoFap forums this morning discussing how to best rape me to fix my "attitude". It has been posted for months. Who supports rape revenge against a female scientist?" When another Twitter user @MapProfessor asked Defendant Prause to provide sources, Defendant Prause replied "My attorneys and police already have it. They are the ones entitled to evidence." See Exhibit R. When another Twitter user, in response to her dubious claims about rape threats being posted on NoFap's forums, suggested that Defendant Prause not pay attention to "that junk," Defendant Prause responded "Because <u>they have filed lawsuits</u> lying that they are not doing this, they have forced me to have to read this garbage. Classic abusive move. I also do need to keep my family safe when <u>they</u> are talking about how to kill me. I would love to have nothing to read. [emphasis added]" See Exhibit V.
- 60) On February 21, 2020, upon information and belief, Defendant Prause used the @BrainOnPorn Twitter account to contact a writer at least 6 times asking him to update his article about my website to "accurately reflect the extensive misogyny" of the NoFap community. Defendant Prause claimed that the writer was "the only person who did not see the extensive misogyny (of hundreds)." In another tweet, Defendant Prause wrote "An op-ed by a rando filled with errors awfully useful to the for-profit company he wrote about. Hmmm...\$\$\$?" See Exhibit W.
- 61) After this lawsuit was filed, Defendant Prause has continued to post criticism, defamation, and misleading statements about me and my website online. Due to the sheer abundance of defamation propagated by the Defendants, only a selection of Defendant Prause's

Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 13 of 64

continued tortious activities were included in the First Amended Complaint and this Declaration.

62) I declare under penalty of perjury that the foregoing is true and correct.

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March 23, 2020 Executed on

Alexander Rhodes



NoFap.com Website

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		posting on our forums.							
		is from around the world:							
		Much like our users, our team members are located in many countries scattered around the globe. NoFap® is based out of Pittsburgh, Pennsylvania within the United States of America. But we have volunteers and contractors located in countries such as the United Kingdom, Canada, Egypt, Israel, and elsewhere.							



Can I send a donation via traditional mail?

Yes, you can send donations to this address:

NoFap LLC PO Box 81015 Pittsburgh, PA 15217

While you may opt to use shipping tracking, please avoid requiring a signature for delivery. Letters that require signatures will likely be retuined liverable.

Is my contribution tax deductable?

No, because NoFap isn't registered through the government as a 501(c)(3) non-profit entity. Unfortunately, donations are not tax deductible mean they don't go to a good cause!

Email Footers (2017 screenshot)

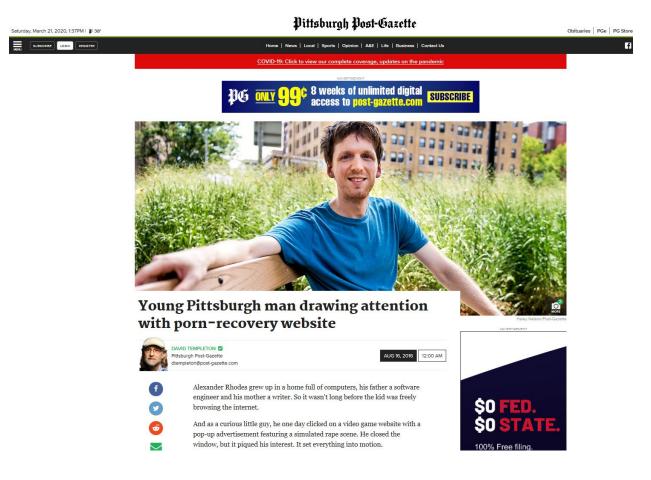


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Soon the initial curiosity evolved into a daily devotion to hard-core pornography — an explorative compulsion turned addiction with up to 14 porn sessions a day, resulting in pain and even injury to himself. "Everything was escalating," he said.

The routine continued once he enrolled at the University of Pittsburgh, where he started a relationship with a young woman and soon discovered problems with his own sexual performance. He couldn't continue without fantasizing about pornography. Nothing quite worked when he focused solely on her.

That was the turning point.

What Mr. Rhodes and others describe as porn addiction and porn-induced erectile dysfunction are hot topics among psychologists, psychiatrists, researchers and even pornographers. In time he finally quit the porn habit and founded the successful porn-recovery platform NoFap.com.

Mr. Rhodes, 26 and currently living in Shadyside, says the platform reaches more than 1 million unique visitors a month, many experiencing physical and psychological problems resulting from salacious material online. The site features articles, scientific studies, advice and chats, creating a solid network of people helping each other to express their sexual habits in a way they believe are healthier and make them happier.

He and his website are drawing national attention.

Mr. Rhodes was featured in an April 11 cover story in Time magazine ("Why young men who grew up on internet porn are becoming advocates for turning it off") with an extended July 8 profile of Mr. Rhodes in The New York Times ("The Anti-Porn Purveyor") and a May 26 op-ed piece he wrote for the Washington Post ("The conversation we're not having about porn"), among many others.

Operating the website with his team represents a full-time occupation, along with a busy schedule of interviews and appearances.

"This is not what many people like talking about," he said. "But I talk about the uncomfortable subject matter openly rather than hide it. My goal is to spread the word, create awareness, but not legislate against pornography."

The science of porn

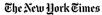
Most influential to date has been a 2014 Cambridge University study that found addictive-related brain changes from X-rated content, with less arousal



The New York Times

nytimes.com/2016/07/08/fashion/mens-style/anti-internet-porn-addict.html

 \equiv Q, MEN'S STYLE





Alexander Rhodes, the founder of a pornography recovery website, said giving up porn has allowed him to have meaningful relationships. Kristian Thacker for The New York Times

By Sridhar Pappu

July 6, 2016

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Alexander Rhodes sat along a stretch of grass, looking out over the Allegheny River. The two of us were sitting in a quiet space on the outskirts of Pittsburgh where we had planned to spend the night in tents camping out.

"The key thing to consider is that I am not a very good businessman," he said. "I'm not really anything but a guy who was addicted to internet porn."

A few years ago, Mr. Rhodes, 26, founded a <u>website</u> as an online space meant to help others who share his particular problem. It has about one million unique visitors each month, he said, and nearly breaks even.

Mr. Rhodes, who grew up in western Pennsylvania and worked at

Wikipedia

Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 18 of 64



Business Insider

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EXHIBIT B

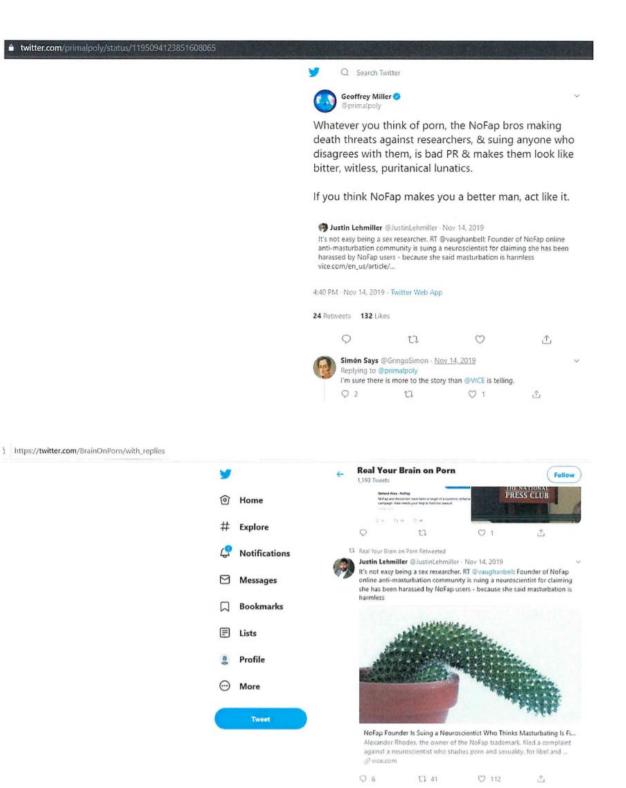
Israel Photograph: The Western Wall



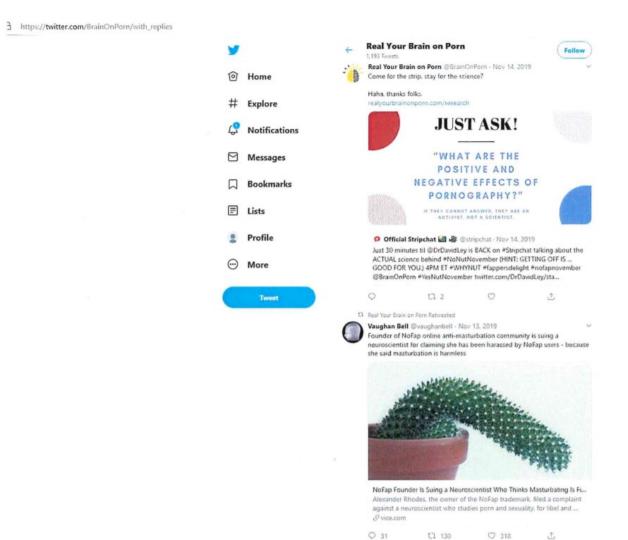
Israel Photograph: Masada



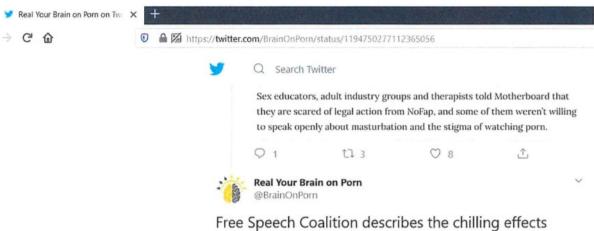
EXHIBIT C



Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 22 of 64



Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 23 of 64



Rhodes/NoFap malicious legal threats have had on education and free speech in the USA.

"There's reason to be concerned about the way in which the trademark of NoFap by Alexander Rhodes might be used to silence criticisms of antimasturbation campaigns, which have historically been referred to as NoFap," Mike Stabile, communications director for adult industry advocacy group Free Speech Coalition, told Motherboard. "This makes it tremendously difficult for critics of these anti-masturbation campaigns to reach an audience, because they can't use 'NoFap' without fear of legal retribution. As a result, scientists, therapists and others who have spoken out about the anti-masturbation community's anti-semitism, misogyny and harassment find themselves targeted if they use the phrase."

10:53 PM · Nov 13, 2019 · Twitter Web App

1 Retweet 5 Likes

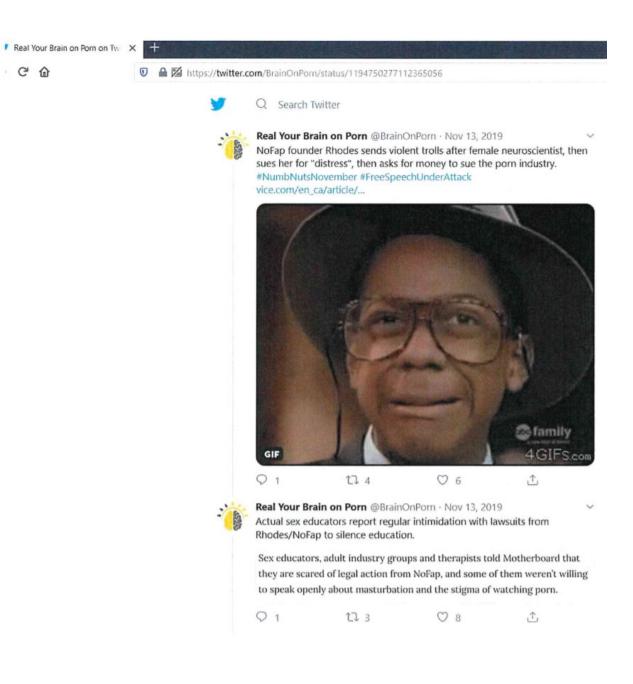
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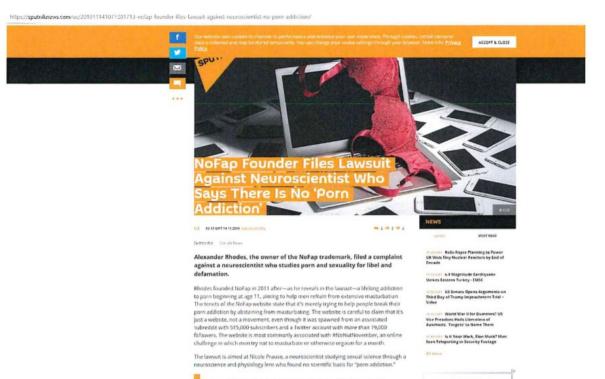
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Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 24 of 64



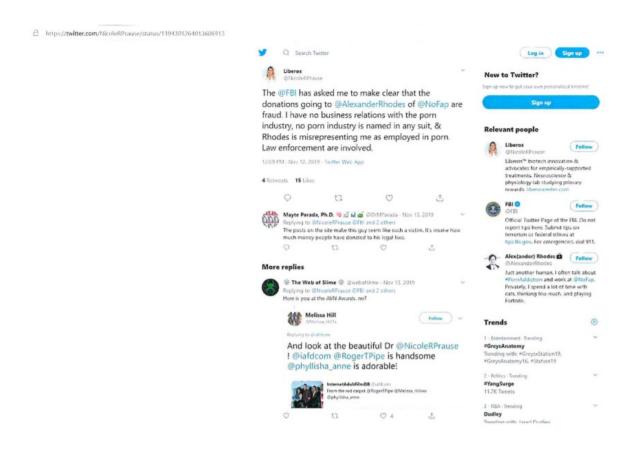
Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 25 of 64



These online communities have whipped themselves into a frenzy when in the past men wouldn't have been concerned, " Prause told the Guardian in 2016. "Then the next time they go to have sex they are

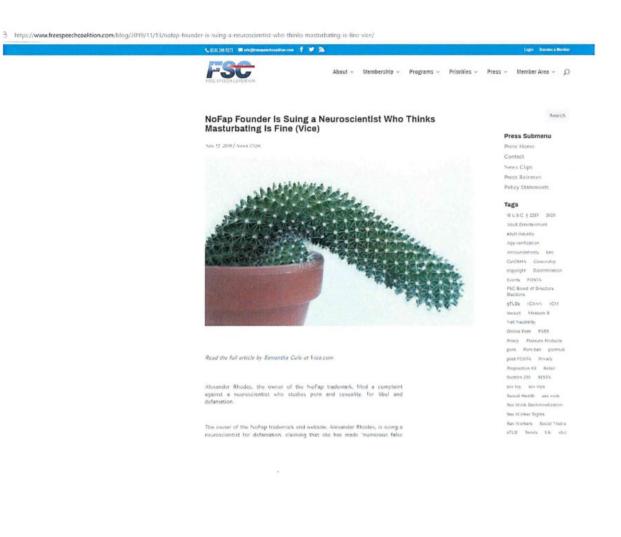
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Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 26 of 64

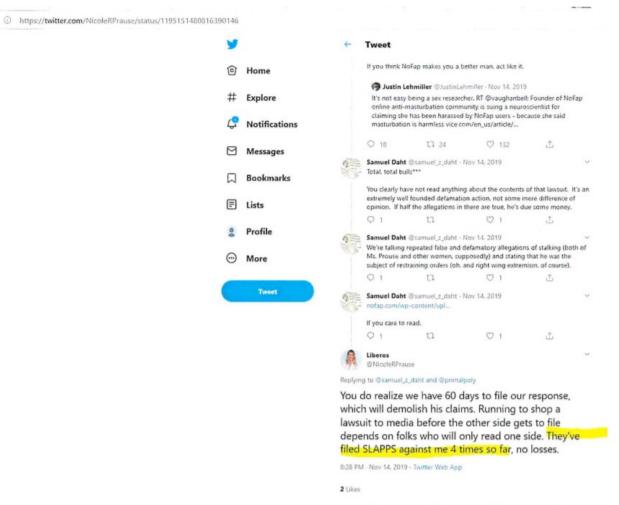


https://twitter.com/NicoleRPrause/status/1195148033777782784

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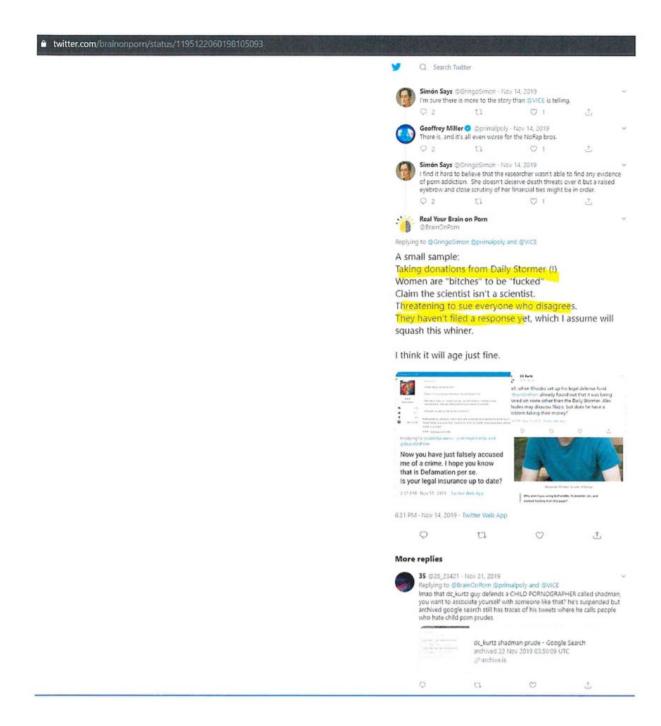


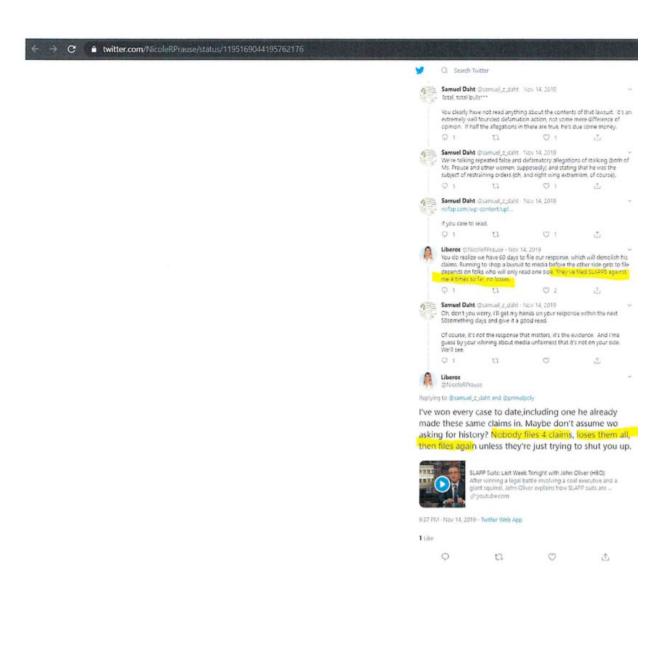
Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 28 of 64



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Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 29 of 64





Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 31 of 64

https://twitter.com/BrainOnPorn/status/1190383763932368896



lt's...worse.

Misogyny, pimping for religious anti-porn groups, and selling a "premium" membership and t-shirts. twitter.com/BrainOnPorn/st...

West is born-again, also against premarital sex, so #NoFap is just promoting religious shame. I'm sure West called them right up 😂

faces. How about for one giving indece ow the ass crack and vaginal region qu out enough to show their lady bits for ated through DNS servers through the c





Andrew Product

Case 2:19-cv-01366-MPK Population 30-D Filed 03/23/20 Page 32 of 64



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Second Sec

January 20, 2020 By Sam Bright and Kate Plummer

An academic is reportedly recieving death threats from members of the far-right, after a crowdfunding campaign was set up to sue her for defamation.

Nicole Prause (pictured above), an American neuroscientist who studies porn and sexuality, has said that she started to receive death threats after Alexander Rhodes (pictured below), an anti-masturbation campaigner, set up a <u>crowdfunding campaign</u> using fundraising platform Donorbox to sue her for "defamation".

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Put These Lights In Kitchen

Ad This simple \$50 lighting trick will make your ki stunning. (See pics)

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Rhodes is the founder of NoFap, a website that claims to help people with porn addiction, while Prause has researched porn addiction and claims that she has found no scientific basis for it. Rhodes has said this research is tantamount to defamation and is suing Prause.

Writing on his campaign page, Rhodes says he's been "targeted by an unprecedented campaign of defamation from entities who appear to be closely associated with the porn industry."



Alexander Rhodes/Facebook

But as well as denying claims that she is associated with the porn industry, Prause has said this campaign has now led to far-right harassment from Rhodes' supporters, including "death threats" and "misogyny".

Prause claims that Rhodes' fans have tried to hack her Facebook and email, while directing a string of harassment at her. Indeed, a number of online comments in support of the crowdfunding campaign use violent language towards Prause – including one tweet that reads: "I hope there's bloodshed".

 $m{r}$ Adding to this, Prause believes she is being stalked, and that her address has been posted online.

The No Fap crowdfunding campaign, targeting Prause, has received a range of positive coverage from far-right "news" Sites, including <u>The Daily Stormer</u>, which accompanied their story with an anti-Semitic cartoon. It has also been featured on <u>Infowars</u>, run by far-right US commentator Alex Jones, and forum <u>Poal.</u>

As a result, it's no surprise that one comment on the crowdfunding page calls for "groypers" to "rise up". Groypers is a far-right meme based on an image similar to Pepe the Frog. Prause also claims several other far-right messages were posted on the page, though they appear now to have been deleted.

Bob The Builder | \$10.70

Porn is the route of most if not all problems in society today. It makes you lazy, fat, anxious, and frankly I wonder if my life would have been significantly better if I had never typed in sex in google at the age of 7. Those who profit off destroying countless families and lives of young men like myself should frankly be in jail if not taxed 200% of their income. Stay strong brothers in Christ. Groypers rise up

<u>Speaking to VICE</u>, Prause said: "Alexander Rhodes and NoFap's lawsuit has no merit nor do his libelous and unfounded assertions regarding me, my character, or my business.

"He is entitled to his opinions, however he is not entitled to spread complete falsehoods about me to profit himself and silence speech."

Making all this possible is **Donorbox**, an online donation system that profits by hosting user's campaigns.

But unlike many other services, Donorbox has been embroiled in controversy, due to the clients it hosts.

The platform has been criticised for allowing the far-right to fundraise, including <u>Tommy Robinson</u>, James Goddard and the <u>now-defunct</u> far-right "news" platform Politicalite.

FAKE NEWS

Donorbox is well aware that it hosts characters who could be generously described as unsavoury. Last year, BuzzFeed asked Donorbox founder Charles Zhang why his company platformed hate figures, receiving little response.

It seems possible that Rhodes was aware of his campaign's controversial nature and that, to avoid being noplatformed, he needed to choose a payment system with laissez-faire rules. A Q&A section on his crowdfunder says:

Why aren't you using GoFundMe, Kickstarter, etc, and instead hosting it on this page?

Unfortunately, based on past observations, we're concerned that if we hosted the fundraiser on one of those websites, somebody would work hard to ensure that it gets taken down using frivolous complaints or legal intimidation. We're self-hosting our own crowd funding campaign to be more resilient to censorship from the porn industry and its supporters. However, because it's hosted right on our homepage, you know that this campaign is authentic. All payment pages are encrypted and donating here is just as safe as it is on other traditional crowd funding websites.

But while Donorbox is more relaxed about its clients than other platforms, it would appear that Rhodes' campaign could still be violating its terms and conditions. Indeed Donorbox says it blocks "campaigns that are fraudulent, misleading, inaccurate, dishonest, impossible or imitating any other person or fundraising campaign without permission."

Schodes' No Fap page suggests that his campaign is fighting the "porn industry" – an industry Prause insists she has absolutely no ties to. It could be argued that Rhodes is being deliberately misleading.

The crowdfunder has raised \$84,000 so far. Donorbox will earn <u>1.5%</u> of what is fundraised, meaning it has earned \$1260 and will gain \$3000 if the crowdfunder reaches its \$200,000 target.

A very healthy return.

TAKE ACTION

DONORBOX SHOULDN'T BE MAKING MONEY FROM HATE AND FAKE NEWS: SIGN THE PETITION NOW

Home Page Campaigns

Writing news and running campaigns to change the status quo. Celebrating diversity, exposing austerity, and tackling global problems. Press for change.

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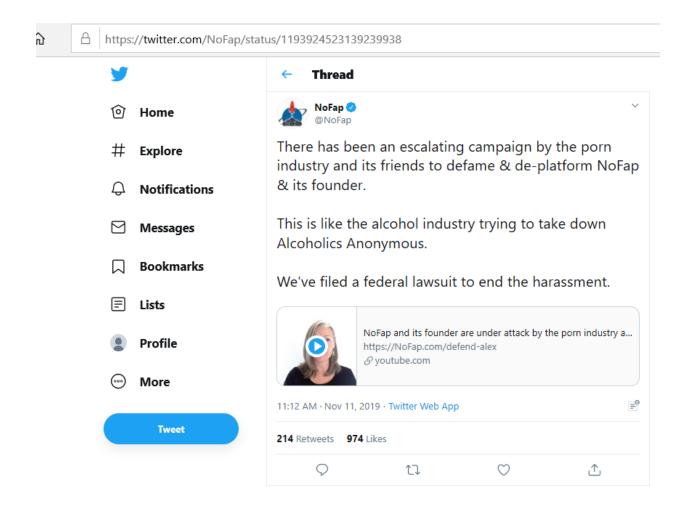


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Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 39 of 64

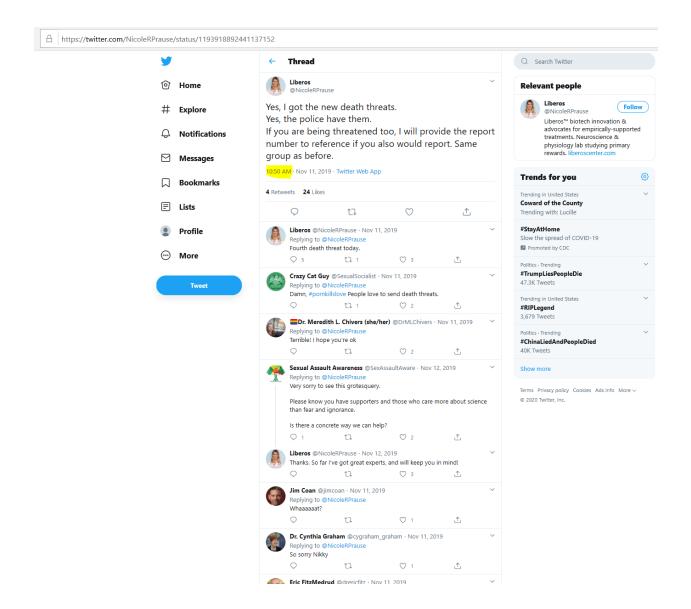


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Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 41 of 64

EXHIBIT F

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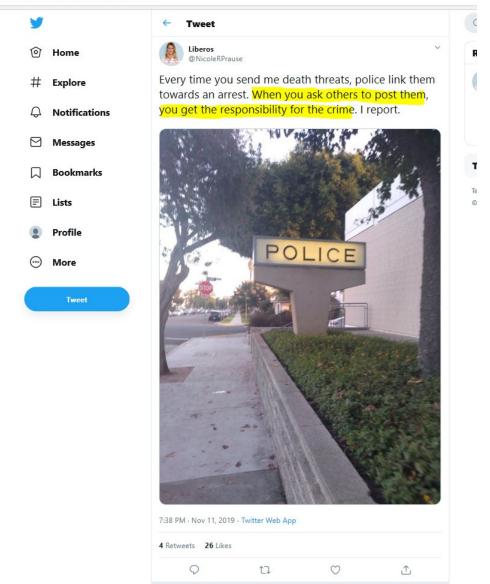
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https://twitter.com/NicoleRPrause/status/1193953616488361984 ← Thread Liberos @NicoleRPrause · Nov 11, 2019 Ø Home Yes, I got the new death threats. Yes, the police have them. If you are being threatened too, I will provide the report number to # Explore reference if you also would report. Same group as before. Q 12 0 24 îl 4 ≏ Д Notifications Liberos @NicoleRPrause \square Messages Fourth death threat today. Bookmarks 1:08 PM · Nov 11, 2019 · Twitter Web App 1 Retweet 3 Likes F Lists \heartsuit 1] ≏ Profile . Ed @Ed_UKation · Nov 11, 2019 Replying to @NicoleRPrause \odot More Why is this happening to you? I've just started following your twitter. \mathcal{Q}_1 17 01 ≏ Liberos @NicoleRPrause · Nov 11, 2019 Anti-porn activists. Many of us get death threats from these people. If you don't say porn is all bad all the time they openly talk about how they will kill you. Q 3 17 ♡ 4 ≏ Ed @Ed_UKation · Nov 11, 2019 It's worrying that death threats seem to be the new norm in online interaction for certain groups. 1] 01 ≏ Dwight Scholl (@ 1. 2019) @mrdscholl · Nov 11, 2019 Replying to @NicoleRPrause So sorry you have to deal with things like this. 17 0 2 ≏ Crazy Cat Guy @SexualSocialist · Nov 11, 2019 Replying to @NicoleRPrause Do you have security? Q 2 17 ♡ 2 ≏ Liberos @NicoleRPrause - Nov 11, 2019 Yes, but I do not disclose details publicly so that it will remain effective. The exception is that I am in the California address protection program for stalking since they have been posting my address and trying to show up at my work. sos.ca.gov/registries/saf... Q ♡ 2 11 仚 ihavebigstupid @ihavebigstupid · Nov 12, 2019 Replying to @NicoleRPrause Great! 0 î٦ \heartsuit ≏

Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 43 of 64

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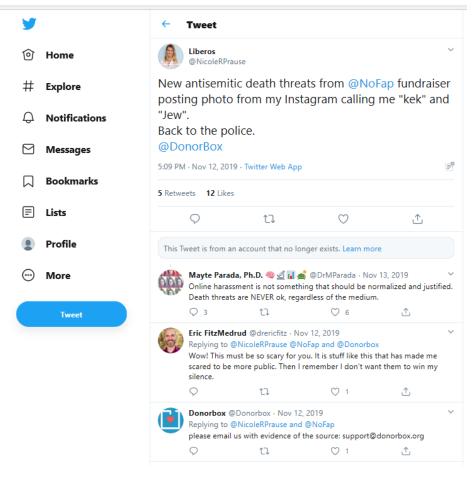
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Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 44 of 64

EXHIBIT F

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Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 45 of 64

EXHIBIT F

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Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 46 of 64

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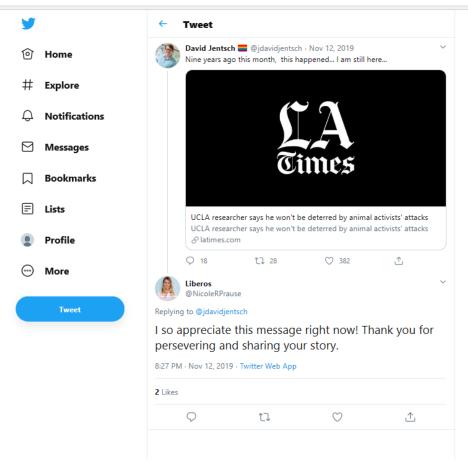
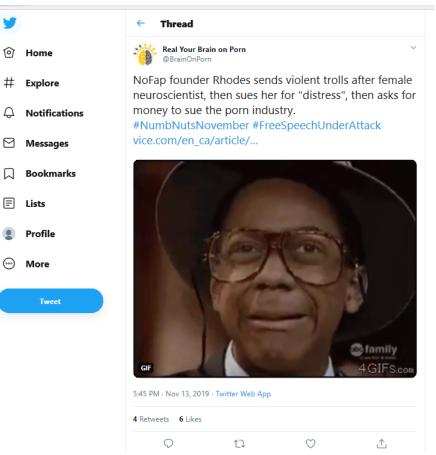


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Exhibit G

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NoFap Founder Is Suing a Neuroscientist Who Thinks Masturbating Is Fine

Alexander Rhodes, the owner of the NoFap trademark, filed a complaint against a neuroscientist who studies porn and sexuality, for libel and defamation.

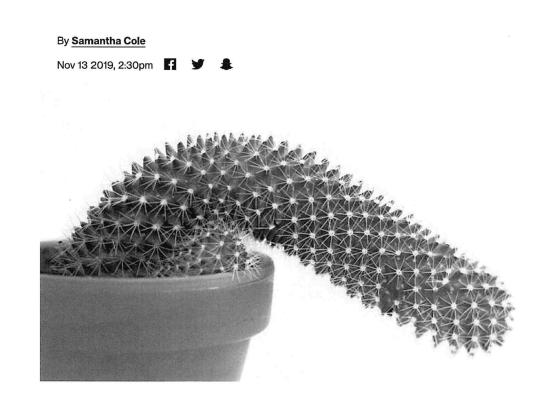


IMAGE VIA GETTY IMAGES

The owner of the NoFap trademark and website, Alexander Rhodes, is suing a neuroscientist for defamation, claiming that she has made "numerous false and defamatory statements" about him and his work.

Rhodes founded NoFap in 2011 after—as he tells it in <u>the lawsuit</u>—a lifelong addiction to porn beginning at age 11. His work, put simply, is to help men resist jerking off. The tenets of the <u>NoFap website</u> state that it's merely trying to help people break porn addiction by abstaining from masturbating. The website is careful to claim that it's just a website, that it's not a movement, even though it was spawned from an associated subreddit with 515,000 subscribers and a <u>Twitter account</u> with more than 19,000 followers.



NoFap is most commonly associated with #NoNutNovember, an online challenge in which men try not to masturbate or otherwise orgasm for a month. As with many male-focused online communities, there are parts of the community that are focused on men's rights, are misogynistic, and that have harassed people. A 2018 study published in the peer-reviewed journal Sexualities found that members of NoFap online communities don't see women in porn as "real women," and that "real sex" is seen through the predominately male, heterosexual worldview of its members.



Let This Be the Last No Nut November

SAMANTHA COLE

Nicole Prause, a neuroscientist who studies sexual science through a neuroscience and physiology lens, has researched so-called "porn addiction" and found no scientific basis for it. "These online communities have whipped themselves into a frenzy when in the past men wouldn't have been concerned," Prause <u>told the Guardian in 2016</u>. "Then the next time they go to have sex they are causing themselves more distress."

Prause has said publicly that she is regularly harassed by NoFap followers, and in posts in the last few days, she's claimed that harassment and death threats from Rhodes' fans have escalated to the point that the FBI and local law enforcement are involved.

In the lawsuit, Rhodes claims that Prause's statements are false, and have caused him to suffer "significant reputational harm and sustained actual damages" in lost revenue, productivity, and expenses in amount amount exceeding the jurisdictional minimum of \$75,000.

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"Alexander Rhodes and NoFap's lawsuit has no merit nor do his libelous and unfounded assertions regarding me, my character, or my business," Prause told Motherboard. "He is entitled to his opinions, however he is not entitled to spread complete falsehoods about me to profit himself and silence speech."

Rhodes' attorney, Andrew Stebbins, told Motherboard that Rhodes will not tolerate "malicious personal attacks from those who seek to discredit, disparage and otherwise injure him through false statements designed to

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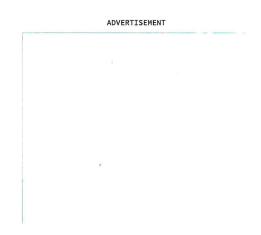
assassinate his character and reputation. This case is brought solely in response, and properly limited in scope, to such attacks."

Rhodes also launched a crowdfunding campaign where he aims to raise \$200,000 to pay for the lawsuit. At the time of publication, he has raised \$34,327.89.

Sex educators, adult industry groups and therapists told Motherboard that they are scared of legal action from NoFap, and some of them weren't willing to speak openly about masturbation and the stigma of watching porn.

Max Bennet, Vice President of New Media at amateur camming platform Stripchat, said that Stripchat decided to start hosting a weekly interactive stream for users with therapist David Ley, after conducting a user survey.

The informal survey found that many of the people who watch the platform feel bad—or at least anxious—about their porn and masturbation habits. Of the 6,300 Stripchat users they surveyed, 42 percent said they experienced at least "occasional anxiety" about their **<u>cam-viewing habits</u>**.



On Thursday, Ley will host a <u>special No Nut November-themed stream</u>. But Ley and Stripchat are hesitant to even mention NoFap in announcements, because they fear harassment from people in that movement.



How Cam Models Changed the Porn World Forever SAMANTHA COLE 1/24/2020

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"These folks are some of the most obsessive, hateful folks I've ever encountered online," Ley told Motherboard. "They rabidly attack anyone who disagrees with them, with extraordinary black and white thinking... My impression is that they tend to be highly obsessive individuals who transmute their obsessive use of porn into an obsession with attacking people who might expose that the problem is in them, rather than the porn. Ultimately, they're the problem, not the porn."

The phrase NoFap was <u>trademarked by Rhodes in 2013</u>. The <u>NoFap website</u> <u>states</u> that "using the NoFap Marks as a generic word for quitting porn or abstaining from masturbation" isn't an authorized use of the trademark.

"The need [for Stripchat's therapy chat] is there, in part I believe because of the anti-masturbation messaging put out by different groups," Bennet said. "When it came to #NoNutNovember, we decided to focus specifically on this topic, but we avoided using certain phrases in our conversations and posts because of the trademark."

"There's reason to be concerned about the way in which the trademark of NoFap by Alexander Rhodes might be used to silence criticisms of antimasturbation campaigns, which have historically been referred to as NoFap," Mike Stabile, communications director for adult industry advocacy group Free Speech Coalition, told Motherboard. "This makes it tremendously difficult for critics of these anti-masturbation campaigns to reach an audience, because they can't use 'NoFap' without fear of legal retribution. As a result, scientists, therapists and others who have spoken out about the anti-masturbation community's anti-semitism, misogyny and harassment find themselves targeted if they use the phrase."

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All of this—the slippery nature of NoFap's founding principles, Prause getting harassed online—are typical when trying to understand the topic of groups like NoFap and No Nut November. <u>Last year, Motherboard examined</u> 1/24/2020

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the origins of the anti-masturbation movement: Orgasm denial and control over one's own sex drive are key priniciples of historically fascist and white supremacist groups, including the Proud Boys and the Klu Klux Klan. (<u>In</u> <u>2016</u>, Rhodes appeared on former Proud Boys leader Gavin McGinnes' podcast, and <u>in 2018</u>, denied knowing at the time that the Proud Boys was a white supremacist group.)

"It's endlessly fascinating to me how these folks take on the role of besieged martyrs, fighting against evil, but then claim their arguments are not based in morality," Ley said. "I'm personally and professionally troubled that they present men and masculinity as being so weak that dirty movies overwhelm our reason, our self-will, and cripple our penises. It's a disturbing presentation of their idea of men."

TAGGED: SEX, MASTURBATION, NOFAP, NO NUT NOVEMBER

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Eleven people are dead and six more are wounded — including four police officers — after a mass shooting at the Tree of Life Congregation in Pittsburgh's Squirrel Hill neighborhood Saturday morning.

The shooter, who officials said had an assault-style rifle and three handguns, is in custody, Pittsburgh police said. Officials have confirmed he is Robert Bowers, 46, of Baldwin Borough. He was in Allegheny General Hospital in fair condition with multiple gunshot wounds, officials said. ontent ents ticle *W*ikipedia store

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With the uncertainty surrounding the outbreak of the **coronavirus pandemic**, v across the globe that our volunteers are working to bring you a trusted source these challenging times, knowledge must and will remain open for all.

Read more \rightarrow

en.wikipedia.org/wiki/Pittsburgh_synagogue_shooting

Pittsburgh synagogue shooting

From Wikipedia, the free encyclopedia

The **Pittsburgh synagogue shooting** was a mass shooting that took place on October 27, 2018, at the Tree of Life – Or L'Simcha Congregation^[a] in the Squirrel Hill neighborhood of Pittsburgh, Pennsylvania. The congregation was attacked during Shabbat morning services. The shooter killed eleven people and wounded six. It was the deadliest attack on the Jewish community in the United States.^{[5][6]}

Robert Gregory Bowers, 46 years old,^{[7][8]} was arrested at the scene and charged as the suspect with 63 federal crimes, some of which are capital crimes.^[9] He has pleaded not guilty.^[9] He separately faces 36 charges in Pennsylvania state court.^{[7][10]}

Bowers had earlier posted anti-Semitic comments against HIAS (formerly, Hebrew Immigrant Aid Society) on the online social network Gab.^{[11][12][13]} Dor Hadash^[14] and Tree of Life were supporting participants.^[15] Referring to Central American migrant caravans and immigrants, Bowers posted on Gab that "HIAS likes to bring invaders in that kill our people. I can't sit by and watch my people get slaughtered. Screw your optics, I'm going in."^[16]

Some sources say that this incident should be classified as an act of domestic terrorism.^{[3][17][18]}

Contents [hide]



Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 56 of 64

EXHIBIT I

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PROUD BOYS

Established in the midst of the 2016 presidential election by *VICE* Media co-founder Gavin McInnes, the Proud Boys are self-described "western chauvinists" who adamantly deny any connection to the racist "alt-right," insisting they are simply a fraternal group spreading an "anti-political correctness" and "anti-white guilt" agenda.



EXTREMIST GROUP INFO:

SPLC DESIGNATED HATE GROUP

Date Founded: 2016

Location: New York City, New York Ideology: <u>General Hate</u> Their disavowals of bigotry are belied by their actions: rank-and-file Proud Boys and leaders regularly spout <u>white nationalist</u> memes and maintain affiliations with known extremists. They are known for <u>anti-Muslim</u> and misogynistic rhetoric. Proud Boys have appeared alongside other <u>hate groups</u> at extremist gatherings like the <u>"Unite the Right</u>" rally in Charlottesville. Indeed, former Proud Boys member <u>Jason Kessler</u> helped to organize the event, which brought together Klansmen, antisemites, Southern racists, and militias. Kessler was only "expelled" from the group after the violence and near-universal condemnation of the Charlottesville rally-goers.

Other hardcore members of the so-called "alt-right" have argued that the "western chauvinist" label is just a "PR cuck term" McInnes crafted to gain mainstream acceptance. "Let's not bullshit," Brian Brathovd, aka Caeralus Rex, told his cohosts on the antisemitic The Daily Shoah

From the blog Oct. 13, 2018 Far-right skinheads join Proud Boys in assaulting protesters in New York City following Gavin McInnes event

O Not secure | takimag.com/article/introducing_the_proud_boys_gavin_mcinnes/ CONTRIBUTORS SUBSCRIBE DONATE LOGIN номе POLITICS CULTURAL CAVIAR COMMERCE GREATEST HITS TE TRENDING Introducing: The Proud Boys Gavin McInnes 🛚 Crushing the Coronavirus Curve September 15, 2016 On Sunday, September 11, while college students The Week That Perished vandalized memorials, the NYC chapter of the Proud Boys held its second meet-up at the Tribeca bar Gaslight. Though the exact details are kept secret, the meetings The Chinks in Our Armor usually consist of drinking, fighting, and reading aloud from Pat Buchanan's Death of the West. There were about fifty men at this gathering and no women because women The Democratic Party's are not allowed. The basic tenet of the group is that they Problem With Blacks, Women, are " Western chauvinists who refuse to apologize for Jews, and Homosexuals creating the modern world." □ □ Like Archie Bunker, they long for the days when "□ □ girls were girls and men were men." 🗆 This wasn" 🗆 t controversial even twenty years ago, but being proud of Western culture today is like being a crippled, black, lesbian communist in 1953. We just had a Reasons for Hope man apologize to Chelsea Clinton for being a man and another almost lose his job because he won" - t watch gay movies.

EXHIBIT I

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 washingtonpost.com/news/morning-mix/wp/2017/07/10/the-alt-rights-proud-boys-love-fred-perry-polo-shirts-the-feeling-is-not-mutual/
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 video called "10 Things I Hate About Israel").

The Proud Boys hold an equally incendiary worldview. <u>In an introductory post</u> about the group in September 2016, McInnes, wrote the basic tenet of the outfit was "Western chauvinists who refuse to apologize for creating the modern world." Initiation into the group is a process. The first degree is announcing you're a Proud Boy. "This means you make your Western chauvinism public and you don't care who knows it," McInnes wrote.

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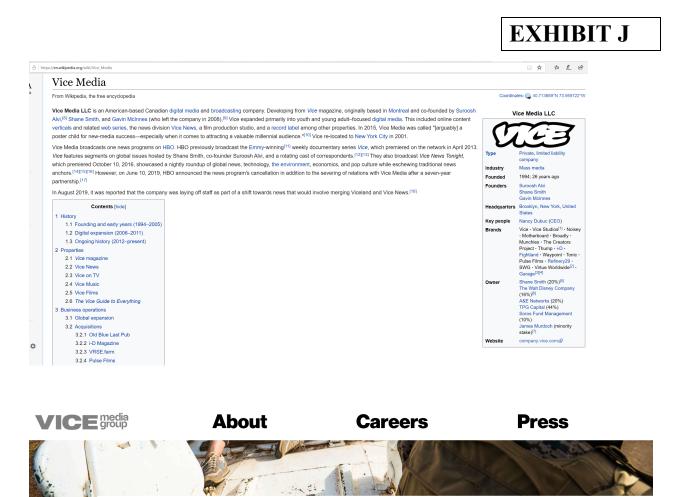
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The second degree involves taking a beating from five other Proud Boys until you can say the name of five breakfast cereal brands. This level also requires the initiate to give up masturbation. The third degree means you must get a "Proud Boy" tattoo. The fourth and final level requires the would-be Proud Boy to engage in "a major fight for the cause." McInnes has <u>explained</u>: "You get beat up, kick the crap out of an antifa."

Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 58 of 64





The world is ever-evolving and full of raw, untapped potential. We exist to help people navigate it all.

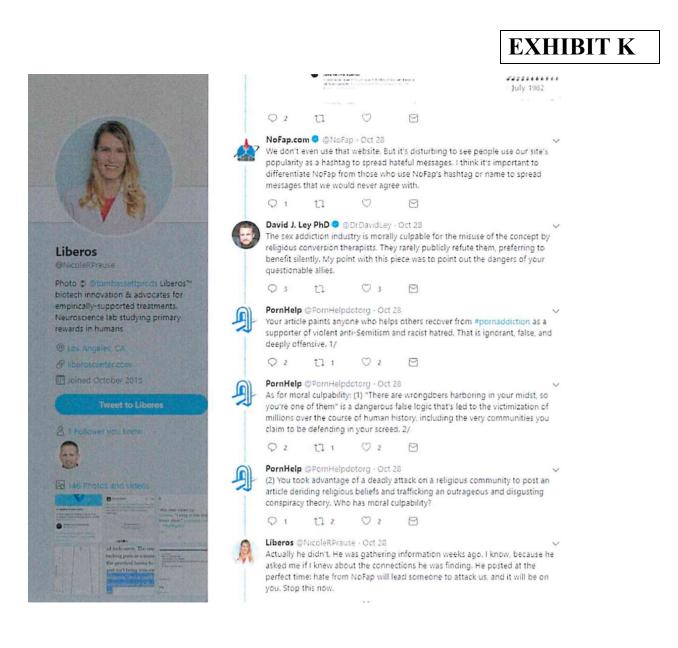
Launched in 1994, VICE has offices in 35 cities across the world and makes 1700 pieces of content every day through five key lines of business: <u>VICE.com 7</u>, an award-winning international network of digital content; VICE Studios, a feature film and television production studio; <u>VICELAND 7</u>, an Emmy-winning international television network; a Peabody award-winning <u>NEWS 7</u> division; and <u>VIRTUE 7</u>, a global, full-service creative agency with 21 offices around the world.





70 New clients at VIRTUE this year

Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 59 of 64



Case 2:19-cv-01366-MPK Docu ADD Dit Liled 03/23/20 Page 60 of 64



BUREAU OF ENFORCEMENT AND INVESTIGATION

11 Stanwix Street, Room Pittsburgh, PA 15222

Professional Conduct Investigator I Email: Telephone: Fax: www.dos.state.pa.gov

February 25, 2020

Alexander Rhodes

Dear Alexander Rhodes,

The Bureau of Enforcement and Investigation (BEI) assigned me to gather facts regarding information that was reported to the State Board of Psychology about your professional conduct and your website NoFap. Your input regarding this matter may assist the Board in determining the outcome. I would like to speak with you, in person, to obtain information on this matter.

I have attempted to contact you using the email address <u>contact@NoFap.com</u>.

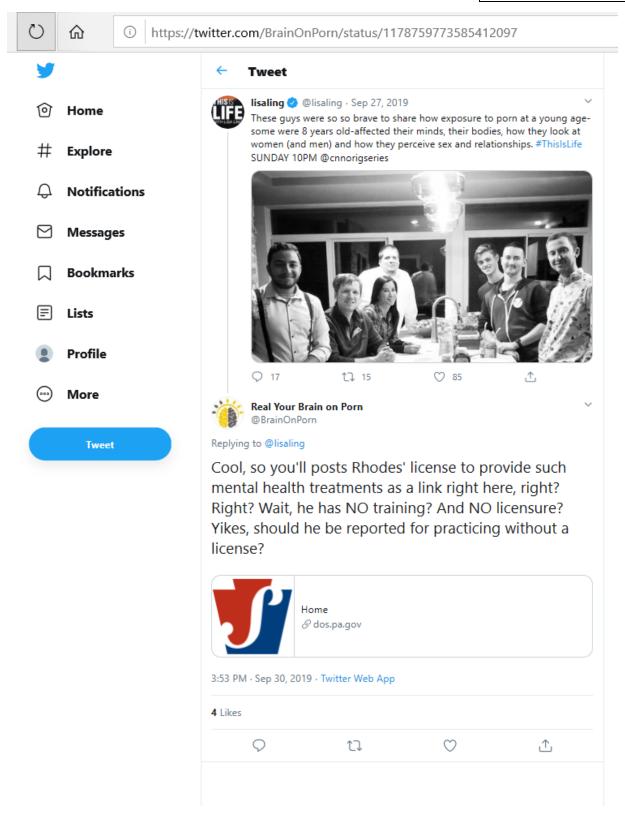
Please contact me as soon as possible to schedule a meeting at a location that would be mutually acceptable. My best telephone contact number is my BEI mobile number of My email address is **Sector Context**. My work schedule is Monday through Friday, from 8:30 a.m. to 5:00 p.m. Please let me know when you would be available, and I will certainly attempt to accommodate your request.

If I do not meet with you by March 13, 2020, I will inform BEI that you do not wish to cooperate with this inquiry, and I will proceed without your input.

Sincerely,



EXHIBIT M





Professional Licensing

The Pennsylvania Department of State receives complaints concerning the licensees and registrants of the following 29 professional and occupational licensing boards & commissions regulated by the Department's Bureau of Professional and Occupational Affairs.

If you believe the practice or the service provided by a licensee or registrant of the above-named boards or commissions to be unethical, immoral, below an acceptable standard of practice or out of the scope of the profession you are urged to file a Statement of Complaint Form with the Department of State. Also, if you suspect someone of unlicensed practice, please file a complaint.

Please note the following guidelines before completing and submitting the Statement of Complaint Form:

- The Department will not involve itself in a monetary dispute unless it involves an allegation that services were billed for, but were not rendered -- or if there is evidence of other billing or insurance fraud.
- The Department cannot act as a court of law to impose prison sentences or to order a person to make monetary restitution. This can only be achieved through the services of an attorney in a civil or criminal court proceeding.
- Decisions about whether or not to prosecute cases are constrained by the applicable licensing laws, rules and
 regulations, which set forth specifically enumerated offenses for which the licensing boards and commissions may
 impose discipline on a licensee. If offensive conduct or activity does not fit within any specifically enumerated
 offense, disciplinary action cannot be filed against the licensee because the activity is not within the applicable
 board or commission's jurisdiction
- If you file a complaint, you may be required to attend a formal hearing and provide testimony in support of your complaint should a decision be made to file formal charges against a licensee.

Case 2:19-cv-01366-MPK Document 30-1 Filed 03/23/20 Page 63 of 64

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A https://www.dos.pa.gov/ProfessionalLicensing/FileaComplaint/Pages/default.aspx

Pennsylvania Department of State

- Download <u>the Statement of Complaint Form (PDF)</u>. You will need Adobe Acrobat or Adobe Reader to view this form. If you do not have either please click on the link in the left hand navigation bar to get a free Adobe Acrobat Reader. Return the completed form by mail to the Professional Compliance Office at: Department of State, Professional Compliance Office, PO Box 69522, 2601 North Third Street, Harrisburg, PA 17106-9522. Be sure to include any attachments and supporting documents (legible copies, no originals) that you wish to provide in support of your complaint.
- You may request a Statement of Complaint Form by mail, by calling the Professional Compliance Office Hotline at <u>1-800-822-2113</u> (if you are calling from within Pennsylvania) or at <u>1-717-783-4854</u> (if you are calling from outside Pennsylvania). Return the completed form to the Professional Compliance Office at: Department of State, Professional Compliance Office, PO Box 69522, 2601 North Third Street, Harrisburg, PA 17106-9522. Be sure to include any attachments and supporting documents (legible copies, no originals) that you wish to provide in support of your complaint.

If you require special accommodation in downloading or viewing the form, please e-mail us at <u>RA-BPOA@pa.gov</u> or call the Complaint's Hotline.

Upon receipt of your Statement of Complaint form, it will be reviewed to ensure that the complaint is within the Department's jurisdiction. A written acknowledgment of having received your complaint will be mailed to you using the name and address provided on your submittal. Unfortunately, due to the large number of cases that we process, we are unable to provide regular status reports or updates. You will be notified of the final disposition of your complaint. Please be aware, however, that pursuant to Act 25 of 2009, 63 P.S §2205.1, if you submit a complaint anonymously, the Department will not be able to share any information pertaining to the complaint with anyone, including you.

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Exhibit N

GMail

Alexander Rhodes

Fwd: Some things before you arrive, and safe travels!

1 message

@nofap.com> To: Alexander Rhodes @nofap.com>	Tue, Feb 25, 2020 at 4:07 PM
Forwarded message From: The second second nofap.com> Date: Sat, the second seco	
Hello	
Thank you for deciding to share your experiences with us and <i>This is Life with Lis</i>	sa Ling.

Just a few notes:

- If you have any questions, please let me, Alexander, or a crew member know right away. We're here to make this experience comfortable and fun for you.

- Note that this is simply an event to discuss porn addiction among peers, not actual *treatment* for porn addiction, not medical advice, and not healthcare or mental healthcare. We strongly encourage everybody to consider seeing a porn addiction-literate therapist. NoFap has published advice on this page: https://www.nofap.com/articles/how-to-find-a-therapist/. If you want a referral or are wondering if you should contact a therapist, please let us know either in person or through email and we can put you in touch with a local therapist who can assist you.

See you soon!