16

17

18

19

20

21

22

23

24

25

26

27

28

1	WILLIAM D. COFFEE, ESQ. (Bar No. 143653)	
	bcoffee@sr-firm.com	
2	NICHOLAS W. LYNES, ESQ. (Bar No. 312463)	
nlynes@sr-firm.com  SONGSTAD RANDALL COFFEE & HUMF		REVIIP
5	3200 Park Center Drive, Suite 950	
4	Costa Mesa, California 92626	
ا ہے	Telephone: (949) 757-1600	
5	Facsimile: (949) 757-1613	
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,	Case No.: 20STR001022
12	Petitioner,	DECLARATION OF STACI SPROI
12	i cutioner,	DECLARATION OF STACES ROC
13	v.	
14	GARY WILSON,	
~ '	~~~~~ · · · · · · · · · · · · · · · ·	

I, Staci Sprout, declare and state as follows:

Respondent.

1. I am over the age of 18 years of age. If called upon to testify to the matters stated herein, I could and would do so competently and of my own personal knowledge.

**DECLARATION OF STACI SPROUT** 

- I am a licensed psychotherapist (Licensed Independent Clinical Social Worker, or LICSW), a Certified Sex Addiction Therapist and the author of the book, Naked in Public: A Memoir of Recovery From Sex Addiction and Other Temporary Insanities. My book and much of my work is intended to provide hope and help to people who suffer from sexual addiction. As detailed more fully below, I have been attacked online and have been falsely accused by Nicole Prause ("Prause") because I disagree with her on the issue of whether pornography is addictive.
- 3. Prause made three formal complaints against me to regulatory bodies: two to the Washington State Department of Health, and one to the National Association of Social Workers. In the 25 years of practice since earning my Master's Degree in Social Work, I have never had a

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

complaint filed against me for any reason, or been accused of wrongdoing or ethical misconduct, other than the complaints filed by Prause. In each case, the complaints contained false accusations against me.

- 4. Prause made an unfounded complaint to the Washington State Department of Health on January 24, 2018, which was dismissed without investigation. Among other things, she falsely claimed that I engaged in "false advertising to patients" "intentional misinformation" and that I violated "numerous standards of care". From the terms of her communication to the Department of Health, her real concern was that I teach people that sex addiction is a genuine problem that can be overcome with proper therapy and help. Prause disagrees and made false complaints to the Washington State Department of Health because of such disagreement.
- Prause made a second unfounded complaint to the Washington State Department of Health on June 13, 2018. Again, her complaint was closed without investigation.
- 6. In the summer of 2018, Prause filed a formal complaint to the National Association of Social Workers about me for ethical violations. Again, the gist of the complaint was that I was spreading false information and taking advantage of my clients because my therapy practice is dedicated to helping adults heal from sex/relationship addiction, intimacy avoidance, and betrayal trauma. This complaint was also dismissed because it lacked merit.
- 7. I have had several uncomfortable exchanges with Prause online. My first experience with Prause was when she posted a critical tweet in response to one of mine in November 2017. She used the account "Liberos@NicoleRPrause" to publicly name me and disagree with something I had posted on my public twitter account. I responded to her as a comment on her twitter post to debate the issue. Within a few exchanges it was clear to me she was not interested in genuine dialogue. In fact, I experienced her as an intellectual bully, and I responded by immediately blocking her on twitter. I have a personal policy to block people who are abusive in any way, or attempt to be. If I had known I would be facing two years of harassment after that, I would have taken a screen shot of this first exchange.
- 8. Prause also made a false accusation on my public Facebook author page in 2018, after I posted an article from World Psychiatry, saying that I was "lying to line [my] pockets" and that I

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

"should have had a complaint filed against [me]" and stating, "...oh, you're not licensed. Well, that makes sense." My post was not about her at all, it was an article on the Compulsive Sexual Behavior Disorder diagnosis being considered by the World Health Organization — yet she personalizes so much of what I do as an online educator. In fact, I have been a Licensed Independent Clinical Social Worker in the state of Washington in good standing since 7/22/2001.

- 9. I have never met Prause in person, nor has she been a psychotherapy client of my private practice. After enduring her online attacks and false reports against me, I eventually began to stand up for myself. I published facts online about her harassment of me, disagreed with her opinions, and made true public statements as an online educator and activist. I also stood up for colleagues she has attacked. That is not defamation.
- It is a core value for me to find compassion for all people who feel oppressed. I believe Prause is casting herself in this role as part of her ongoing campaign to intimidate those who disagree with her. In actuality, she is the offender. This is a chronic pattern for which Prause is already under legal pursuit.
- 11. After being forced to address Prause's false reports, even though they were all dropped without formal investigation, I sought support from other colleagues who had been similarly attacked by her — I know of more than a dozen, and there are far more out there I do not know. Last year, I signed an affidavit detailing my experiences with Prause in a defamation lawsuit filed by a neurosurgeon colleague against Prause. In January, I signed an affidavit detailing my experiences with Prause in another defamation lawsuit filed by yet another victim of her relentless bullying. I was introduced to this young man by a mutual colleague, and felt concern for his suffering as a result of her harm to him. I offered to help him raise money for his legal campaign fundraiser, and recorded a video telling the truth about what's been going on. To date he has received over \$111,000 in donations to support his case, for his legal fees.
- 12. In late December of last year, Prause sent me a letter demanding that I pay her \$10,000 based on claims that are either clearly false, or based on public statements I have made about Prause that are true. She sent a similar demand letter to a news organization that published an unflattering story about her, stating they owed her \$10,000 also. Criticism based on true actions is

 $\mathbb{Z}^4$ 

not defamation, it is the outcome of being a public figure.

- 13. In January, I was served with a copy of a lawsuit filed by Prause against me in the Los Angeles County Small Claims Court in California. Ms. Prause makes several unsubstantiated claims that I am defaming her and misrepresented to the Court that I do business in California, in order to try and gain jurisdiction over me. Now I am legally forced to deal with this a small claims suit in a city I do not live in, work in, nor own property in for her baseless claims.
- 14. I believe the lawsuit recently filed against me by Prause in California is part of an ongoing effort by Prause to use the legal system to pursue misance false complaints to harass myself and others she seeks to silence.

1 declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 25th day of March 2020 at Statio, WA WA

Stacy Sprout