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GARY WILSON

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

11 NICOLE PRAUSE,  
12  
Petitioner,  
13  
v.  
14 GARY WILSON,  
15  
Respondent.

**Case No.: 20STR001022**  
**DECLARATION OF ALEXANDER RHODES  
IN SUPPORT OF MOTION TO STRIKE THE  
REQUEST FOR A CIVIL HARASSMENT  
RESTRAINING ORDER**  
(CCP 425.16 Anti-SLAPP)  
[Notice of Motion and Motion to Strike;  
Declaration of Gary Wilson; Declaration of Staci  
Sprout filed concurrently herewith]  
Date: August 6, 2020  
Time: 8:30 a.m.  
Dept.: 22

21 1. My name is Alexander Rhodes. I am over eighteen (18) years of age. If called upon  
22 to testify to the matters stated herein, I could and would do so competently of my own personal  
23 knowledge.

24 2. I have filed a federal lawsuit in Pennsylvania against Nicole Prause (“Prause”) and  
25 her company Liberos LLC (“Liberos”) which arose out of numerous false and defamatory  
26 communications by Prause.

27 3. Prause’s defamatory communications about me include but are not limited to  
28 numerous false statements that I personally engage in criminal behavior, including that I’m stalking

1 her, that I'm cyber-stalking her, that I have been reported to the FBI for stalking, that I have been  
2 reported to the FBI for cyber-stalking, that I have been reported to the FBI for computer intrusion,  
3 that I have been reported to the FBI for criminal threats, that I harass her, and that I am engaged in  
4 fraud. Additionally, Prause has repeatedly claimed that she has restraining and no-contact orders  
5 against me.

6 4. Prause's defamation campaign has been obsessive and significantly disruptive to my  
7 life and career. It is challenging to document the sheer amount of defamation and disinformation  
8 that Prause has spread about me - and since October 2018, dealing with Prause's escalating  
9 defamation campaign has practically been a full-time job in itself.

10 5. In addition to repeatedly claiming that I am personally involved in criminal behavior,  
11 Prause has endeavored to personally smear me as a misogynist, affiliated with hate groups, and a  
12 sympathizer of anti-Semitism.

13 6. I am not a misogynist nor an anti-Semite. Indeed, while I am not a religious person, I  
14 am ethnically Jewish. In 2010, I went on a Taglit-Birthright Israel trip with a group of other young  
15 Jewish adults exploring the country for the first time. Since then, I have been back to Israel two  
16 more times so far.

17 7. I have never met Prause, have never seen Prause, and have never even had a private  
18 correspondence with Prause. I believe that Prause has targeted me because I run a website that raises  
19 awareness about porn addiction.

20 8. On February 25, 2020, I was contacted by the Pennsylvania Department of State  
21 regarding a complaint received by the Pennsylvania Board of Psychology against me for the  
22 unlicensed practice of psychology. While the Pennsylvania Department of State Bureau of  
23 Enforcement and Investigation cannot provide me with information about who submitted the  
24 complaint, this fits the pattern of Prause's actions directed towards numerous people in my field.

25 9. This complaint was filed on October 01, 2019, the day after a Twitter account  
26 believed to be run by Prause, @BrainOnPorn, tweeted about reporting me to the State Board in  
27 response to my appearance on *This is Life with Lisa Ling*, which was filmed in Pennsylvania.  
28 Prause's Twitter post replied to a photograph that Lisa Ling posted, captioned with "These guys

1 were so so brave to share how exposure to porn at a young age-some were 8 years old-affected their  
2 minds, their bodies, how they look at women (and men) and how they perceive sex and  
3 relationships. #ThisIsLife SUNDAY 1 OPM @cnnorigseries.”

4 10. Prause’s Twitter post stated “Cool, so you’ll posts Rhodes’ license to provide such  
5 mental health treatments as a link right here, right? Right? Wait, he has NO training? And NO  
6 licensure? Yikes, should he be reported for practicing without a license?” Prause’s Twitter post  
7 linked to the Pennsylvania Department of State website’s instructions on how to file a complaint.

8 11. On Monday, March 16, 2020, the investigator told me that while they cannot provide  
9 me with a hard copy of the report due to Pennsylvania Department of State policies, the report stated  
10 that I am “charging residents of Pennsylvania for treatments for compulsive sexual behavior” and  
11 that I “hold no appropriate training and no licensure” to do so. The complaint also states that I  
12 “described his providing treatments on CNN’s Sunday [sic] to Lisa Ling.”

13 12. I have never practiced or purported to practice psychology or provide mental  
14 healthcare treatments to residents of Pennsylvania without the appropriate licensure to do so. The  
15 allegations in the Pennsylvania State Board of Psychology complaint are complete fabrications  
16 designed to harass and otherwise defame me.

17 13. In addition, since I filed my lawsuit against her, Prause has threatened and initiated  
18 several SLAPP actions against identified witnesses, those who have shown support for me, and those  
19 who have reported about the lawsuit.

20 14. For example, Prause has filed a defamation complaint in the Small Claims Court of  
21 Los Angeles County against Staci Sprout, a witness in my lawsuit against her and Liberros.

22 15. Prause has threatened to a file defamation action against a Canadian publication, The  
23 Post Millennial, in response to an article that they published which reported about my lawsuit against  
24 her and Liberros.

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16. 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.

17. 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.

18. Due to the sheer abundance of defamation and disinformation propagated by Prause, only a small selection of her tortious activities was included in this declaration. Should this Court require further information, more documentation and exhibits are available on the docket of my federal lawsuit against Prause and Liberros.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 7<sup>th</sup> day of May 2020 at Pittsburgh, Pennsylvania.

Alexander Rhodes  
Alexander Rhodes