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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

Case No.: 20STRO01022

**DECLARATION OF GARY WILSON IN
SUPPORT OF THE RESPONDENT’S REPLY
TO PETITIONER’S OPPOSITION TO ANTI-
SLAPP MOTION TO STRIKE PURSUANT
TO CODE OF CIVIL PROCEDURE
SECTION 425.16**

Date: August 6, 2020
Time: 8:30 a.m.
Dept.: 22

17
18
19
20 I, Gary Wilson, declare and state as follows:

21 1. I am a resident of Ashland, Oregon. I make this declaration in support of my Reply to
22 the Opposition of Petitioner Nicole Prause (“Prause”) to my Motion to Strike the Request for Civil
23 Harassment Restraining Orders (“Motion”) filed against me. I am over the age of 18 and if called
24 upon to testify to the matters stated herein, I could and would do so competently of my own personal
25 knowledge.

26 2. In the declaration Prause filed in support of her opposition to the Motion, Prause refers
27 to a conference in Germany. I did attend the International Conference on Behavioral Addictions
28 (“ICBA”) in Cologne, Germany, which took place in April 2018, and I was welcome to attend.

1 Credentials were not required, although I am the co-author and author of two peer-reviewed
2 publications on the subject of pornography’s effects. I registered in advance to hear the latest research
3 on behavioral addiction from world experts. Prause was not, in fact, invited to speak at the ICBA
4 conference and was not among the registrants (See July 31, 2020 letter I received from ICBA
5 organizers attached hereto as **Exhibit “1”** confirming Prause was not an invited presenter or on the
6 list of registrants for the ICBA conference). My decision to attend the conference had nothing to do
7 with her. As Prause did not attend the conference, I had no contact of any kind with her at the
8 conference.

9 3. In her declaration, Prause claims that in or about March 2016, in Los Angeles, she
10 believed that she saw a man surveilling her office. Prause concedes she did not identify this person as
11 me (in fact, Prause has never met me). To be clear, I was not in Los Angeles in March 2016, nor have
12 I ever been to Prause’s office. I have never gone to Los Angeles or anywhere else for the purpose of
13 surveilling Prause or having any contact whatsoever with Prause.

14 4. On my website, I have done nothing more than express my opinion regarding Prause
15 and her research as it pertains to pornography’s effects on individuals, which is a matter of widespread
16 public interest. This is evidenced by the fact that my website, which serves to report and archive
17 research with regard to this topic, averages approximately 15,000 unique visitors per day. It is also
18 evidenced by the fact that the latest edition of the diagnostic manual of the World Health Organization,
19 the ICD-11, authored by world health experts, contains two new disorders that can be used to diagnose
20 problematic pornography use, depending upon a patient’s indications: “Compulsive sexual behavior
21 disorder (6C72)” and “Other specified disorders due to addictive behaviors (6C5Y).”

22 5. I am not aligned with and have no affiliation with any “white supremacy” groups and
23 in fact, I abhor such groups. I have never encouraged anyone to threaten Prause in any way.

24 6. Prause has attached as Exhibit “B” to her declaration what she claims to be threats
25 directed to her in comments purportedly posted in response to an article in Psychology Today. I did
26 not make these comments and I have never even seen these comments before.

27 7. I do note that Exhibit “B” includes more false claims by Prause about me. Apparently,
28 Prause sent an email to an individual at Psychology Today on April 19, 2019 and falsely stated that I

1 had “an extensive record with LAPD for stalking” Prause, and that it appeared to be me making the
2 threats. These statements are completely false. I have not made any threats to Prause, including the
3 purported threats contained in the comments to the Psychology Today article. Further, there is no
4 record with the LAPD of me stalking Prause. As stated in my declaration filed in support of this
5 Motion originally, Prause did file a report against me with the LAPD in 2018 that was filled with lies
6 but did not allege that I had committed any crime. The police took no action and in fact never contacted
7 me.

8 8. I have never made threats to any of Prause’s staff or research workers. I have never
9 accused Prause of being a pedophile, child molester, or convicted felon. I have never posted Prause’s
10 home or work address on the internet.

11 9. I did file a complaint regarding Prause with the California Board of Psychology (the
12 “Board”) in approximately October 2016. The Board is a public agency that is part of the California
13 Department of Consumer Affairs. All of the information I submitted to the Board in support of the
14 complaint was true. I am aware that since 2016, at least three other complaints have been filed with
15 the Board against Prause by persons other than me. At the suggestion of the Board’s investigator, I
16 regularly checked the Board’s online system during the 3-year investigation of Prause. I never saw
17 any indication that Prause was suspended from practice.
18

19 10. I did not publicly refer to the complaint I had filed with the Board until after Prause
20 first publicly revealed that “Gary Wilson” had filed a Board complaint against her, at which time she
21 also claimed she had prevailed. Only then did I publicly correct her in a comment section, explaining
22 that the investigation appeared to be ongoing, as I had recently been asked if I would testify if it came
23 to a hearing. Months after that, the Board terminated its lengthy investigation, stating narrowly that,
24 “There was insufficient evidence to establish a violation of the laws and regulations relating to the
25 practice of psychology with regard to [Prause’s] practice or conduct in this matter.” (October 11, 2019
26 letter from Board attached to Prause declaration as Exhibit “C”)
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12. The statements and information attached as Exhibit “D,” Exhibit “F” and Exhibit “G” to Prause’s declaration from my website are all true. They are examples of Prause’s malicious actions against me and defamatory statements made by Prause regarding myself and others, including Don Hilton and Alexander Rhodes, both of whom have filed defamation lawsuits against Prause that are currently pending. Further, I did obtain information from Prause’s twitter feed that indicated Prause did collaborate with the Free Speech Coalition (“FSC”), the lobbying arm of the porn industry. (See tweets from Prause attached as **Exhibit “2”** hereto).

13. In 2013 and 2014, my wife and I did exchange correspondence with UCLA regarding Prause. One of the reasons for the communications was that Prause indicated that she was using resources from UCLA to maintain a website which contained defamatory and false allegations about me (See copy of “SPAN Lab” webpage from 2013 that states “Copyright © 2012-2013 SPAN Lab, all Rights Reserved University of California, Department of Psychiatry” attached hereto as **Exhibit 3**). In 2013, Prause had also created defamatory YouTube channels named “Gary Wilson Stalker” and “Gary Wilson Is a Fraud” which are also referred to in the UCLA letters. In 2013, Prause, using an alias, posted comments to various YouTube videos with false statements about me, including that I was “**currently charged with stalking a female scientist**”, an obvious reference to herself (See copy of comments attached hereto as **Exhibit “4”**). UCLA declined to discipline Prause, explaining that her website was not, in fact, a UCLA website on their servers (making it impossible for them to discover the source of the defamatory material), which she had denied posting (but nevertheless removed).

14. The UCLA letters simply confirm that Prause has been maliciously targeting me since 2013, attempting to brand me falsely as a “stalker.” The frivolous request Prause has filed with this Court for a restraining order against me is just another example of Prause making false accusations

1 against me and filing false claims to try and discredit and silence me because I disagree with her
2 publicly regarding her views on the effects of pornography.

3
4 15. With regard to Prause's claim that I have posted photographs of her on my website, the
5 screenshots I have posted are not "pictures of Prause" but rather images of her tweets (her personal
6 twitter account is "Liberos@NicoleRPrause") that were already publicly available, and the tweets
7 were posted to document and attempt to counter her malicious activity directed towards me and others.
8 Attached hereto as **Exhibit "5"** are examples of such screenshots, which include a February, 2019
9 tweet in which Prause made the following false and defamatory statements about me to a woman who
10 made a favorable comment about my work: **"You are promoting stalking women. Wilson has
11 multiple police and FBI reports for stalking me & followers send rape threats."**

12 16. Prause has tweeted about me on her personal twitter account approximately 500 times.
13 She also operates another twitter account called "Real Your Brain On Porn" which she uses to publish
14 additional false and defamatory statements. Attached hereto as **Exhibit "6"** is an example of one such
15 tweet from August, 2019 in which she says that I have **"many FBI and police reports for stalking"**
16 and I promote **"antisemitism that sends death threats to us."**

17 17. Prause's opposition simply confirms my belief that Prause has filed this request in an
18 effort to stifle my right to free speech, to intimidate me from acting as a witness in the defamation
19 lawsuits now pending against her (or to attempt to discredit me as a witness), and to attempt to expunge
20 evidence of her malicious activity.

21 I declare under penalty of perjury under the laws of the State of California that the foregoing
22 is true and correct of my own personal knowledge. Executed this 2nd day of August, 2020 at
23 Ashland, Oregon.

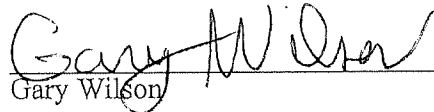
24 
25 Gary Wilson

EXHIBIT 1

To whom it may concern



5th International
Conference on
Behavioral Addictions

07/31/2020

As conference organizers for the 5th International Conference on Behavioral Addictions that was held in Cologne, Germany from April 23 to April 25 in 2018, we are writing to communicate that Dr. Nicole Prause was not an invited presenter. Additionally, her name is not on the list of registrants for the conference/conference program.

Sincerely,

Prof. Dr. Matthias Brand

Prof. Dr. Astrid Müller

Prof. Dr. Zsolt Demetrovics

EXHIBIT 2

FREE SPEECH COALITION & Proposition 60

Adult performer *Ruby the Big Rubousky*, who is vice president of the Adult Performers Actors Guild, stated that Prause obtained porn performers as study subjects through the most prominent porn industry interest group, the Free Speech Coalition. (Prause has since deleted this Twitter thread).



In the case of adult films, however, that possibility has been ruled out by science and accepted by diagnostic groups (DSM-5 and ICD-11).

Data do not support sex as addictive

thelancet.com



2 replies 0 retweets 0 likes 0 messages



Ruby The Big Rubouski @JRAxxx · Feb 3

No it hasn't. And it's irresponsible. Especially coming from someone who exploits performers for her studies.

1 reply 0 retweets 1 like 0 messages



Liberos @NicoleRPrause · Feb 3

All of my studies receive ethics review and approval from federally-monitored institutional review boards. I am happy to share ICD or DSM papers describing why they do not classify them as addictive, if you are interested.

3 replies 0 retweets 1 like 0 messages



Ruby The Big Rubouski @JRAxxx · Feb 3

I'm thinking you get a lot of money and access to performers through the Free Speech Coalition.

1 reply 0 retweets 0 likes 0 messages



Liberos @NicoleRPrause · Feb 3

We are funded by two grants from non-profits. One is a foundation, the other is federal. We have never received any funding from FSC. I do not "access" performers for any of my research.

1 reply 0 retweets 1 like 0 messages



Ruby The Big Rubouski

@JRAxxx

Follow

Replying to @NicoleRPrause @DrDavidLey @ImAriBass

You just lied to me, we know for a fact you use performers.

1:05 PM - 3 Feb 2018

If the above is true it reveals a very cozy working relationship between Prause and the FSC. A relationship that may have started in 2015, when Prause was publicly offered (and apparently accepted) assistance from the deep-pocketed FSC. On October 1, 2015, the FSC (which has spent millions on lawsuits that benefit the porn industry) offered Prause assistance with respect to her so-called "bullies."

FSC FreeSpeechCoalition @FSCArmy · 1 Oct 2015
#Shaming> Strong arm tactics> Is the only "safe sex" in #LosAngeles SEX @aidshealth Michael Weinstein approves?

Tinder Isn't Responsible For STDs, It Says
Tinder and Grindr are not happy after LA billboards link their apps to higher STD rates.
medicaldaily.com

2 1 2

FSC FreeSpeechCoalition @FSCArmy Follow

Replying to @NicolePrause


@NicolePrause Hello Dr :-) if you'd like, contact Diane@freespeechcoalition.com> We hate bullies, too

12:45 PM - 1 Oct 2015

Prause emailed the FSC to accept their "help" with her imaginary bullies. Prause then promptly begins to discuss with another industry account why condoms in porn are a bad idea (the porn industry's position):


FSC FreeSpeechCoalition @FSCArmy · Oct 1
@NicolePrause Hello Dr :-) if you'd like, contact Diane@freespeechcoalition.com> We hate bullies, too

3 4

 Nicole Prause, Ph.D. @NicolePrause · Oct 1
@FSCArmy Emailed!

FAIR 4 CA Condoms in Porn @fair4ca · Oct 1
@NicolePrause "MSM... on GSN apps are at greater risk for [GC/CT] than MSM... who meet in-person or on the internet" ncbi.nlm.nih.gov/pubmed/24926041

View other replies

 Nicole Prause, Ph.D. @NicolePrause · Oct 1
@fair4ca exactly...linking tinder or grindr to spec STI is absolutely false. Risk behav & disease NOT spec to app.ur cite proves my point

PROPOSITION 60

Prause immediately began supporting the FSC's campaign against California's ill-fated Proposition 60 (calling for condom use in porn):



Liberos
@NicoleRPrause

Follow

Got two more #NoOn60 votes this morning because my running buddies thought it put condoms in porn...very misleading prop @FSCArmy

LIKE

1



8:23 AM - 6 Nov 2016 from Los Angeles, CA



Here she retweets FSC propaganda. (Again, dozens of Prause's incriminating pro-FSC tweets have since been deleted.):



Liberos
@NicoleRPrause

Follow

When govt says "we will protect you" & workers say "please don't", workers know what they need #NoProp60



FreeSpeechCoalition @FSCArmy

FSC Executive Director @ericpaulleue ready to lead the rally to #AHF for #NoProp60 #FSCArmy

RETWEETS

2

LIKE

1



11:37 AM - 17 Oct 2016

Prause asks *VICE* magazine to fire infectious disease specialist Keren Landman, MD for supporting Prop 60 (condoms in porn)



Liberos @NicoleRPrause · 1h

@landmanspeaking @Rikoochandstar @VICE The only STI data you cited were from infection clinic, not performer sample. Many science errors.



Keren Landman

@landmanspeaking

Follow

@NicoleRPrause @Rikoochandstar @VICE

Nope.

Sex Transm Dis. 2011 Jun;38(7):644-8. doi: 10.1097/OLQ.0b013e318214e408.

High Chlamydia and gonorrhea incidence and reinfection among performers in the adult film industry.

Goldstein BY¹, Steinberg JK, Avornale S, Korndt PR.

[Author information](#)

Abstract

BACKGROUND: Adult film industry (AFI) performers engage in unprotected oral, vaginal, and anal sex with multiple partners, increasing the likelihood of acquisition and transmission of human immunodeficiency virus and other sexually transmitted diseases. Current industry practice does not require condom use; instead it relies upon limited testing. We sought to estimate the annual cumulative incidence of chlamydia (CT) and gonorrhea (GC) and assess the rate of reinfection among AFI performers.

METHODS: We retrieved all CT and GC cases diagnosed among performers between 2004 and 2008 in Los Angeles, CA and reported to the health department surveillance registry. Using 2008 data, we estimated ranges for CT and GC annual cumulative incidences based on assumptions of the population size of performers. For cases reported between 2004 and 2007, we determined the CT and/or GC reinfection rate within 1 year.

RESULTS: Lower bounds for the annual cumulative incidences of CT and GC among AFI performers were estimated to be 14.3% and 5.1%, respectively. The reinfection rate within 1 year was 26.1%. Female performers were 27% more likely to be reinfected as compared with male performers (prevalence ratio, 1.27; 95% confidence interval, 1.09-1.48).

CONCLUSION: CT and GC infections are common and recurrent among performers. Control strategies, including promotion of condom use, are needed to protect workers in this industry, as testing alone will not effectively prevent workplace acquisition and transmission. Additional legislation that places more responsibility on the production companies is needed to ensure the safety and health of performers.

2:57 PM - 7 Nov 2016



In response to above tweet, Prause *tells* *VICE* magazine that it should fire expert Dr. Landman for writing an article supporting Prop 60:



Liberos

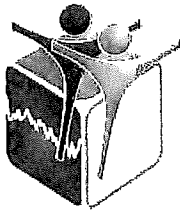
@NicoleRPrause

Fo

@VICE consider letting this freelancer go.
Every political, newspaper (save 1) &
independent scientist is vs. 60,
@landmanspeaking clear bias

3:13 PM - 7 Nov 2016 from Dallas, TX

EXHIBIT 3



span

About
[Welcome](#)
[People](#)
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[Tour](#)
[Mission](#)

Research
[Current Studies](#)
[Publications](#)
[Resources](#)

Get Involved
[Participation](#)
[Training](#)
[Contact](#)
[Your weekend](#)

welcome to span lab

Welcome to the Sexual Psychophysiology and Affective Neuroscience (SPAN) Laboratory. We are devoted to increasing the understanding of sexual responses in individuals, their partners and sexual behaviors that risk physical and emotional health. We conduct research and offer learning opportunities for students. Please feel free to contact us with any questions on the [contact](#) page.

SPAN Lab activity

8/11/13 Greg Siegle and Frause win research award for EEG studies from the [International Academy of Sex Research](#) at their annual meeting.

Ongoing Been diagnosed with "sex addiction" and paying for treatments only to find out that sex addiction is not a diagnosis in the DSM? Any patient can file a complaint against their therapist by going to their [state board](#) and selecting "complaint" for instructions. This process is free.

7/17/13 A new [study of sex addiction](#) discussed on [Psychology Today](#).

6/6/13 Current lab research technology covered by [VICE magazine](#).

1/15/13 Prause nominated for Early Career Award by the [International Society for Psychophysiological Research](#).

1/15/13 Prause awarded Catalyst Grant to host UCLA symposium on sexual motivation.

12/11/12 Prause addresses attraction to certain types of erotica in [Huffington Post article](#).

11/11/12 Prause appears with Greg Siegle and other researchers on the Discovery Channel's "Sex in America" discussing their research on orgasm.

8/15/12 Siegle and Prause awarded MRI scans to pilot a novel reward index that includes sexual tastes.

Upcoming events

November, 2013

San Diego, California
 Prause giving a talk at the Society for Scientific Study of Sexuality annual meeting.

October, 2013

Florence, Italy
 Prause giving a talk at the Society for Psychophysiological Research annual meeting.

August, 2013

Chicago, IL
 Prause giving a talk at the International Academy for Sex Research annual meeting.

June, 2013

Los Angeles, CA
 Prof. Greg Siegle visits SPAN laboratory to test parallel tasks with his UPMC site.

February, 2013

Los Angeles, CA
 Prof. Rudolf Stark will present his fMRI research on sexual learning and motivation.

EXHIBIT 4

GaryWilson Stalker

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!



9:24

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

It's an...

[See all comments](#)

[Delete](#)



SlimDatDude504 2 weeks ago
you mad????

[Reply](#) in reply to GaryWilson IsAFraud (Show the comment)



GaryWilson IsAFraud 2 weeks ago
"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.

[Reply](#)

<input type="checkbox"/> From	Subject	Date
<input type="checkbox"/> JonItalia	Comment on your video: Gabe discusses curing porn-induced ED (show #9)	08/03/13

<input type="checkbox"/>	Comment on your video: Internet Porn: Effects on Social Anxiety & Confidence (show #12)	07/26/13
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GaryWilson Stalker

Well, at least no one is viewing this garbage. In case someone comes across it, Gary Wilson is a fraud. He tells media he is a "physiologist". He actually never went past high school. He also claimed to be a professor at OSU? Ha! Try part time massage therapist now rejected from teaching at an unaccredited massage school. Now he's in trouble for posting pictures of some woman on a porn site without her permission. I give this guy 6 months before he's in jail.



Internet Porn: Effects on Social Anxiety &...
Gary Wilson discusses the relevant science behind 2 common changes guys report after they quit internet porn: increased confidence and decreased social anxiety

[See all comments](#)

[Delete](#)

EXHIBIT 5

continuing into 2019: Prause continues to post defamatory tweets claiming that Wilson was "terminated" from SOU, or was a TA (teaching assistant) at another Oregon University. In addition, she continues to lie about Wilson misrepresenting his credentials.

tweet #1 – 2-25-19:

 **Liberos** @liberaleRPrause [Follow](#)

Replying to @reputalpoly @spasall @optics @YTC@Syndicate

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...

reputalpoly.com

5:27 PM · 25 Feb 2019

1 Like

tweet #2:

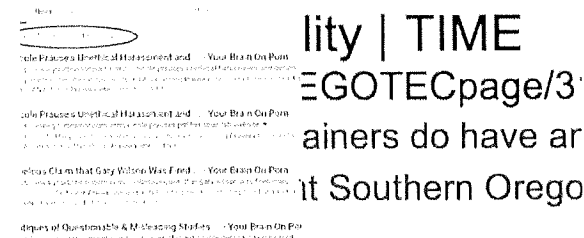
 **Laila Mickelwait** @lailamickelwait · 27h
Thanks for your contribution Gary. You have studied these issues so thoroughly and your expertise in this area is truly unmatched. I'm glad those following this thread will be properly educated.

 **Liberos** @liberaleRPrause [Follow](#)

Replying to @Ladakhshiva @SH101 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.

Visit www.yourbrainonporn.com



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

9:42 AM · 24 Feb 2019

he strikes again.... on a Sunday. Prause lies: Wilson was not terminated, nor was he a TA (as documented in this section). Wilson never misrepresented his credential, and Prause has never cited any evidence for this: Ongoing – Prause falsely claims that Wilson has misrepresented his credentials. Prause's name is not on YBOP 82,000 times: October, 2018: Prause falsely claims that her name appears over 35,000 (or 82,000; or 103,000; or 108,000) times on yourBrainOnPorn.com

EXHIBIT 6



LblForWomen @lblwcri · 5h

This may surprise you but I went through your entire garbage account and your harassment of Gary earlier. Whichever idiot is behind this account - if you think your targeting of one writer isn't obvious you're either stupid or desperate



Real Your Brain on Porn

@BrainOnPorn

Replying to @lblwcri @YourBrainOnPorn and @LailaMickelwait

"one writer" you mean the one who

- 1) lied he's a professor
- 2) lied his account was hacked with porn
- 3) lied he taught a college class
- 4) was told by ACLU to stop harassing us
- 5) has many FBI and police reports for stalking
- 6) promotes antisemitism that sends death threats to us

1:07 PM · Aug 25, 2019 · Twitter Web App



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PROOF OF SERVICE
Nicole Prause v. Gary Wilson
LASC Case No. 20STRO01022

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 **DECLARATION OF GARY WILSON IN SUPPORT OF THE RESPONDENT'S REPLY TO PETITIONER'S OPPOSITION TO ANTI-SLAPP MOTION TO STRIKE PURSUANT TO CODE OF CIVIL PROCEDURE SECTION 425.16** as follows:

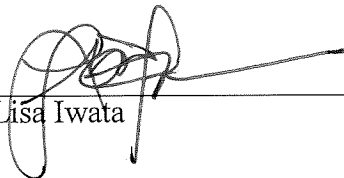
- By Mail:** By placing the document(s) listed above in sealed envelope(s) with postage thereon fully prepaid for collection and mailing in Costa Mesa, California, addressed as set forth below, or as stated on the attached service list.
- E-Mail:** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I sent the document(s) to the person(s) at the e-mail address(es) as set forth below, or as stated on the attached service list.

Brett A. Berman
The Berman Law Group
1801 Century Park East, Suite 1830
Los Angeles, CA 90067
(310) 788-3837. Ext. 200
Email: brett@bermanfamilylaw.com

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 **August 3, 2020**, at Costa Mesa, California.



Lisa Iwata