

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

DONALD L. HILTON JR.

Plaintiff

v.

NICOLE PRAUSE AND LIBEROS LLC

Defendants.

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Case No. 5:19-CV-00755-OLG

**DEFENDANTS NICOLE PRAUSE AND LIBEROS, LLC’S SUPPLEMENTAL BRIEF
IN SUPPORT OF MOTION TO DISMISS DEFAMATION PER SE
PURSUANT TO THE CALIFORNIA ANTI-SLAPP STATUTE**

Defendants Nicole Prause and Libereros, LLC (collectively “Dr. Prause” or “Defendants”) file this Supplemental Brief in Support of Motion to Dismiss Defamation Per Se Pursuant to the California Anti-SLAPP Statute. The Fifth Circuit’s opinion in *Klocke v. Watson*, 2019 U.S. App. LEXIS 25343 (5th Cir. 2019) answers the question as to how the Fifth Circuit views the enforceability of Anti-SLAPP laws in federal court. Under *Klocke*, a federal court should enforce a state Anti-SLAPP law that can be reconciled, or does not conflict with, the federal rules. *Klocke* held the Texas Anti-SLAPP law unenforceable in federal court, but in so doing, distinguished the Texas Anti-SLAPP law from a different Anti-SLAPP law it previously upheld in *Henry v. Lake Charles Am. Press, L.L.C.*, 556 F.3d 164 (5th Cir. 2009). Refusing to overturn *Henry*, the Fifth Circuit explained the Louisiana Anti-SLAPP statute did not impose the same procedural burdens. Importantly, as described by the Fifth Circuit, the Louisiana Anti-SLAPP statute operates nearly identically to the California Anti-SLAPP statute. Because the Fifth Circuit gave effect to a statutory framework in *Henry* that is functionally identical to the California Anti-SLAPP statute,

and refused to overturn *Henry* in *Klocke*, the outcome is clear—the Fifth Circuit would give effect to the California Anti-SLAPP statute, as should this Court.

I. The California Anti-SLAPP Statute is Enforceable in Federal Court under *Klocke*.

In *Klocke*, the Fifth Circuit held the Texas Anti-SLAPP statute could not be applied in federal court, because it conflicts with Federal Rules of Civil Procedure 12 and 56 by imposing additional burden shifting requirements. *Klocke*, 2019 U.S. App. LEXIS 25343, at *9. Rather than holding that all Anti-SLAPP statutes are unenforceable in federal court, however, the Fifth Circuit announced a nuanced approach in *Klocke* that analyzes the specifics of each statute at issue. If there is a “conflict between the [state Anti-SLAPP] law and the Federal Rules [which] is manifest,” the Anti-SLAPP law may not be enforced. *Id.* at *16. If, however, there is not an “obvious” conflict between the Anti-SLAPP law and a federal rule, the Anti-SLAPP law may be enforced. *Id.* The Fifth Circuit *Klocke* opinion refused to rely on prior Fifth Circuit opinion upholding the Louisiana Anti-SLAPP statute because it was a case “interpreting another state’s dissimilar statute.” *Id.* (discussing *Henry*, 556 F.3d at 164). Notably, the Fifth Circuit distinguished the Anti-SLAPP statute in *Henry*, instead of overruling *Henry*. Here, the application of the California Anti-SLAPP statute in federal court is functionally identical to the Louisiana Anti-SLAPP statute to which the Fifth Circuit refused to extend *Klocke* to overturn in federal court. Moreover, because the Fifth Circuit provides great deference to opinions issued by federal courts presiding over matters in their own states which apply the law of their own states, great deference should be shown to the Ninth Circuit and California United States District Court’s application of the California Anti-SLAPP statute in federal court.

A. None of the Conflicts Between the Federal Rules and the Texas Anti-SLAPP Statute Are Present When Applying the California Anti-SLAPP Statute.

Klocke took issue with the Texas Anti-SLAPP statute’s “evidentiary weighing requirements” which impose a “burden-shifting framework,” and stay on “pre-decisional discovery.” *Id.* at *9-*11. None of those concerns exist with respect to the California Anti-SLAPP statute, which instead mirrors the Louisiana statute upheld as applicable by the Fifth Circuit *Henry* opinion which *Klocke* refused to overturn:

- The California Anti-SLAPP Statute Does not Impose a Heightened Burden.

When an Anti-SLAPP motion is filed, “Texas requires the non-movant to set out a prima facie case by ‘clear and specific evidence[.]’” *Id.* at n.7. This burden is higher than ordinarily exists under the federal rules. *Id.* at 10. In contrast, the Louisiana Anti-SLAPP statute requires the non-movant “demonstrate ‘a probability of success on his claim.’” *Id.* As with the Louisiana Anti-SLAPP statute, under the California Anti-SLAPP statute, the non-movant is required to demonstrate a “‘reasonable probability’ of prevailing in its claims for those claims to survive dismissal,” which is applied similarly to Federal Rules of Civil Procedure 12 and 56. The non-movant “must demonstrate that ‘the complaint is legally sufficient and supported by a prima facie showing of facts to sustain a favorable judgment if the evidence submitted by the plaintiff is credited.’” *Metabolife Int’l v. Wornick*, 264 F.3d 832, 840 (9th Cir. 2001). “Thus, a defendant’s anti-SLAPP motion should be granted when a plaintiff presents an insufficient legal basis for the claims or ‘when no evidence of sufficient substantiality exists to support a judgment for the plaintiff.’” *Id.*

- The California Anti-SLAPP Law Allows Pre-Decision Discovery Rights.

The Fifth Circuit held the Texas Anti-SLAPP statute inapplicable in federal court in part because “discovery normally available in federal court is circumscribed” by the statute, “and operates largely without pre-decisional discovery[.]” *Klocke*, 2019 U.S. App. LEXIS 25343 at

*11. In contrast, federal courts applying the California Anti-SLAPP statute simply apply the statute without giving effect to expedited filing requirements and pre-decisional discovery limitations. *Metabolife*, 264 F.3d at 846. *See also, Planned Parenthood Fed'n of Am. v. Ctr. for Med. Progress*, 890 F.3d 828, 833 (9th Cir. 2018).

In sum, *Klocke* does not prohibit application of the California Anti-SLAPP statute. The California Anti-SLAPP statute is dissimilar, and is applied consistent with the federal rules. “If a defendant makes an anti-SLAPP motion to strike founded on purely legal arguments, then the analysis is made under Fed. R. Civ. P. 8 and 12 standards; if it is a factual challenge, then the motion must be treated as though it were a motion for summary judgment and discovery must be permitted.” *Id.* (quoting *Z.F. v. Ripon Unified School District*, 482 F. App'x 239, 240 (9th Cir. 2012)). “In order to prevent the collision of California state procedural rules with federal procedural rules, we will review anti-SLAPP motions to strike under different standards depending on the motion's basis. Our interpretation eliminates conflicts between California's anti-SLAPP law's procedural provisions and the Federal Rules of Civil Procedure.” *Id.*

B. Great Deference is Shown to California Federal Courts' Interpretation of California Law.

When the law of a state over which the Fifth Circuit does not ordinarily preside is at issue on an appeal before the Fifth Circuit, the Fifth Circuit traditionally defers to the analysis of federal courts which ordinarily preside over the state law at issue. The California District Courts and Ninth Circuit recognize the applicability of the California Anti-SLAPP statute in federal court. Because the Fifth Circuit previously upheld application in federal court of the Louisiana Anti-SLAPP statute, there is no compelling reason not to apply the analysis of California federal courts with respect to the California Anti-SLAPP statute. The California and Louisiana Anti-SLAPP statutes are functionally identical, so the outcome should be identical.

“Lacking precise guidance on this issue by the [applicable state] Supreme Court, we give great weight to the decision of the district judge.” *Merchs. Nat'l Bank v. Se. Fire Ins. Co.*, 854 F.2d 100, 105 (5th Cir. 1988). “In such a situation, we accord substantial deference to the district court's determination of the law of the state in which it sits.” *Stephenson v. Paine Webber Jackson & Curtis, Inc.*, 839 F.2d 1095, 1101 n.19 (5th Cir. 1988). “In diversity cases which involve questions of local law, an appellate court gives great deference to the opinion of the district court: [a] federal trial judge who sits in a particular state and has practiced before its courts is better able to resolve difficult questions about the law of that state than other federal judges lacking such experience.” *NCH Corp. v. Broyles*, 749 F.2d 247, 253 n.10 (5th Cir. 1985).

Federal courts which sit in California, District Courts and the Ninth Circuit Court of Appeals alike, uniformly allow federal application of the California Anti-SLAPP statute for the same reasons the Fifth Circuit upheld the Louisiana Anti-SLAPP statute in *Henry*, and refused to overturn *Henry* in *Klocke*. There is no legitimate basis upon which to refuse application of the California Anti-SLAPP statute in federal court in Texas, because the Fifth Circuit approved federal applicability of a similar statute in *Henry*, the Fifth Circuit defers to California federal courts on questions of California law, and the Ninth Circuit has squarely held that the California Anti-SLAPP statute may be federally-applied.

II. Plaintiff's Claims Should Be Struck Under the California Anti-SLAPP Statute.

All of Plaintiff's claims should be struck under the California Anti-SLAPP Statute, including Plaintiff's amended claims. The conduct for which Plaintiff sues Defendants was undertaken in furtherance of their right to petition and engage in free speech on matters of public concern. Moreover, Defendants' statements were privileged under California law.

A defendant may move to strike a cause of action infringing on rights of petition or freedom of speech under California's Anti-SLAPP statute. CAL. CIV. PROC. CODE § 425.16(b)(1). “[I]f

the defendant's act on which the cause of action is based was an act in furtherance of the defendant's constitutional right of petition or free speech in connection with a public issue[,]” it “is one ‘arising from’ protected activity within the meaning of section 425.16[.]” *Digerati Holdings, LLC v. Young Money Entm't, LLC*, 194 Cal. App. 4th 873, 883-84 (2011). “[O]nce it is determined that an act in furtherance of protected expression is being challenged, the plaintiff must show a ‘reasonable probability’ of prevailing in its claims for those claims to survive dismissal [which means] the plaintiff must demonstrate that ‘the complaint is legally sufficient and supported by a prima facie showing of facts to sustain a favorable judgment if the evidence submitted by the plaintiff is credited.’” *Metabolife Int'l v. Wornick*, 264 F.3d 832, 840 (9th Cir. 2001). “If a defendant makes an anti-SLAPP motion to strike founded on purely legal arguments, then the analysis is made under Fed. R. Civ. P. 8 and 12 standards; if it is a factual challenge, then the motion must be treated as though it were a motion for summary judgment and discovery must be permitted.” *Planned Parenthood Fed'n of Am. v. Ctr. for Med. Progress*, 890 F.3d 828, 833 (9th Cir. 2018). If the non-moving party cannot demonstrate the cause of action at issue is valid as a matter of law if challenged on a legal basis, or if the non-moving party cannot present prima facie evidence if challenged on a factual basis, the cause of action should be struck.

A. Plaintiff's Lawsuit Seeks to Punish “Acts in Furtherance” of the Right of Petition and Freedom of Speech.

Plaintiff sues Defendants for defamation based on three discrete acts: (1) filing a formal complaint with the University of Texas Health Science Center at San Antonio (“UT Health”) [D.E. 8, ¶¶6-7]; (2) reporting Plaintiff to the Texas Medical Board for harassing, stalking, and threatening her [D.E. 8, ¶¶8-9]; and (3) reporting Plaintiff to medical journals for misrepresenting his credentials [D.E. 8, ¶10]. Every action for which Plaintiff sues Defendants represents an exercise

of the right to petition or freedom of speech. Plaintiff's lawsuit squarely targets conduct protected by the California Anti-SLAPP statute.

“An act in furtherance” of the right of petition or freedom of speech includes written or oral statements made “before a legislative, executive, or judicial proceeding, or any other official proceeding authorized by law;” written or oral statements “made in connection with an issue under consideration or review by a legislative, executive, or judicial body, or any other official proceeding authorized by law;” written or oral statements “made in a place open to the public or a public forum in connection with an issue of public interest;” and “any other conduct in furtherance of the exercise of the constitutional right of petition or the constitutional right of free speech in connection with a public issue or an issue of public interest.” CAL. CIV. PROC. CODE §425.16(e). “[T]he Legislature intended the statute to have broad application.” *Averill v. Superior Court*, 42 Cal. App. 4th 1170, 1175-76 (Cal Ct. App. 1996).

Petitioning a government official or engaging in speech that is “intended to instigate official governmental investigation into wrongdoing” is privileged conduct. *Carver v. Bonds*, 135 Cal. App. 4th 328, 350 (Cal Ct. App. 2005). Thus, “[c]omplaints to regulatory agencies such as the Medical Board are likewise considered to be part of an ‘official proceeding’ under the anti-SLAPP statute.” *Id.* Here, Defendants’ formal complaints to the University of Texas Health System and the Texas Medical Board were written statements made to initiate formal proceedings. Defendants filed a complaint with UT Health to trigger a formal investigation under UT Health protocols. [D.E. 6-1, ¶¶13-15]. The University of Texas Health Science Center at San Antonio “is a state agency of Texas . . . the word ‘state’ includes state agencies and departments, such as branches of the state university.” *Ripley v. Univ. of Tex. Health Sci. Ctr.*, 400 F. Supp. 2d 933, 936 (W.D. Tex. 2004). Defendants filed a complaint with the Texas Medical Board to instigate

the complaint process relating to investigating “issues related to the standard of care, professional incompetence, unprofessional conduct which may endanger the public, and inability to practice medicine by reason of mental or physical impairment.” Exhibit 1, Supplemental Affidavit, ¶21. The Texas Medical Board “is an executive body of state government; its members are executive officers of the state.” *Hotze v. Miller*, 361 S.W.3d 707, 714 (Tex. Ct. App.—[Tyler] 2012)(citing Tex. Occ. Code. § 152.005). Finally, Defendants’ written statements to medical journals addressed matters being considered or reviewed by UT Health and the Texas Medical Board in connection with formal complaints made to instigate or develop official investigative proceedings. CAL. CIV. PROC. CODE §425.16(e). All the conduct for which Plaintiff sues Defendants are “acts in furtherance” of the right to petition and freedom of speech, and are protected under the California Anti-SLAPP statute.

B. Defendants Petitioned the Government and Exercised Their Freedom of Speech on Matters of Public Interest

Defendants’ complaints to government agencies and reports to public journals also addressed issues of public interest. Defendants sought to address public misrepresentations as to the qualifications of a medical doctor. Whether a medical doctor is qualified, or is exaggerating credentials to the public, is a matter of public interest. “[M]atters of health are undeniably of interest to the public.” *Rivera v. First DataBank, Inc.*, 187 Cal. App. 4th 709, 716 (Cal. Ct. App. 2010)(quoting *Nagel v. Twin Laboratories, Inc.*, 109 Cal. App. 4th 39 (Cal Ct. App. 2003)). Even private reports on matters of public interest are protected under California’s Anti-SLAPP statute. *Averill*, 42 Cal. App. 4th at 1175.

Speech that seeks to provide a cautionary message regarding the credentials or qualifications of a medical professional is speech on a matter of public interest. *Carver v. Bonds*, 135 Cal. App. 4th 328, 344 (Cal. Ct. App. 2005). Defendants’ speech “warned readers not to rely

on doctors ostensible experience . . . and told what it described as a ‘cautionary tale’ of plaintiff exaggerating that experience . . . since the statements at issue served as a warning against plaintiff’s method of self promotion . . . the statements involved a matter of public concern. The challenged statements were therefore protected activity under the anti-SLAPP law.” *Id.* Exercising the right to petition or freedom of speech on a matter that implicates the operations of a medical provider address matters of public interest. *Integrated Healthcare Holdings, Inc. v. Fitzgibbons*, 140 Cal. App. 4th 515, 523 (Cal. Ct. App. 2006). “The hearings and articles focused on [the medical provider’s] ability to successfully operate the hospitals, and the potential harm to the public should [the medical provider fail]. [Defendant’s] e-mail message expressing concern [about the medical provider] and its ability to operate [the hospital] falls squarely within these issues.” *Id.*

Defendants’ speech and petition of government entities addressed issues of public concern, and are protected under the California Anti-SLAPP statute.

C. Plaintiff Cannot “Establish a Probability He Will Prevail.”

Plaintiff cannot establish a probability of success with respect to his defamation claims, because Defendants’ speech and petitions are privileged, and contained truthful statements.

Plaintiff cannot establish Defendants’ complaints that he was harassing and threatening them were false, because Plaintiff engaged in the conduct complained of. Defendants’ earlier Motion to Dismiss and supporting affidavit are replete with examples of harassing and threatening conduct engaged in by Plaintiff, including (*inter alia*) accusing Prause of being “pro-porn,” being affiliated with the pornography industry, sexually abusing children, and working at a research facility that affiliated itself with Nazi pedophiles in order to facilitate research involving sexual abuse of children. *See generally*, [D.E. 6; D.E. 6-1].

With respect to Plaintiff's claims based on Defendants' reports that Plaintiff was exaggerating his credentials, Plaintiff cannot demonstrate a probability of success. Defendants reported that Plaintiff appeared to be claiming an affiliation or employment with UT Health that did not exist. Exhibit 1, Supplemental Affidavit, ¶24. And, in fact, UT Health confirmed he was not an employee. Exhibit 1, Supplemental Affidavit, ¶25. Based on UT Health's response, two medical journals agreed the apparent misrepresentation should be investigated. Exhibit 1, Supplemental Affidavit, ¶25. Plaintiff takes exception with the investigation initiated by Defendants' communications, but Defendants' communications were privileged. Defendants made communications to a public journal of a judicial or public official proceeding, and regarding a judicial or public proceeding, regarding an investigation triggered by a formal complaint process, and an official FOIA request. Such communications are privileged under California law. "[C]ommunicatio[n] to, a public journal, of . . . a judicial [or] other public proceeding, or . . . of anything said in the course thereof" is "[a] privileged publication or broadcast." CAL. CIV. CODE § 47(d)(1). Further, Defendants had a well-founded reason to believe Plaintiff may have misrepresented his credentials, because he was not listed as a faculty member, and UT Health officially reported they had no record of him as an employee. "A privileged publication or broadcast" also includes "[i]n a communication, without malice, to a person interested therein . . . concerning the job performance or qualifications of an applicant for employment, based upon credible evidence, made without malice, by a current or former employer[.]" CAL. CIV. CODE § 47(c). Defendants reported that Plaintiff appeared to be misrepresenting his faculty status on a C.V. or resume (i.e., a document used to obtain employment) based on information obtained from UT Health. Defendants' statements were privileged as a matter of law.

III. Defendants are Entitled to Attorney's Fees and Costs.

Defendants are entitled to attorney's fees and costs under the California Anti-SLAPP statute, upon the Court striking Plaintiff's claims. "[A] prevailing defendant on a special motion to strike shall be entitled to recover his or her attorney's fees and costs." CAL. CIV. PROC. CODE §425.16(c)(1). The Ninth Circuit held that this provision is enforceable in federal court. *Metabolife*, 264 F.3d at 845.

IV. Conclusion

As recognized by the Fifth Circuit in *Klocke*, Anti-SLAPP statutes which do not conflict with federal rules are enforceable in federal court. Defendants are California citizens, with the right to avail themselves of the protections afforded by the California Anti-SLAPP statute. The Court should strike Plaintiff's claims, which seek nothing more than to silence Defendants' truthful, privileged statements regarding matters of public interest. Defendants respectfully request the Court strike Plaintiff's defamation claims with prejudice, retain jurisdiction to assess the appropriate amount of fees and costs, and issue all other relief just and appropriate under the circumstances.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify I circulated a copy of the foregoing document in conformity with the Federal Rules of Civil Procedure to all counsel registered to receive service through the Court's CM/ECF system on September 13, 2019.

Via CM/ECF

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conclusion: Hilton is not a neuroscientist by any standard. See *Declaration of Cantor, attached hereto as Exhibit 1(A)*.

6. Hilton co-authored one chapter in a textbook "Neurobiology of Addictions". The book is not a listed text for any college course that I could identify. In my experience, chapter authors are typically selected by the editors. The editors of this book were his own colleagues at University of Texas Health Sciences Center (Alan Swann and F. Gerard Moeller). To my knowledge, Swann and Moeller also have no background in the scientific study of pornography or sex.
7. To my knowledge, Hilton himself has published only one other book as a single-author, "He Restoreth my Soul: Understanding and Breaking the Chemical and Spiritual Chains of Pornography Addiction Through the Atonement of Jesus Christ". This book was self-published by Hilton. See Publishing Information for Hilton Book, attached hereto as Exhibit 1(B).
8. To my knowledge, Hilton is listed as a reviewer for one publisher, MDPI, which is rated "0", the lowest possible quality, for 2020 by the Norwegian Register for Scientific Journals, Series and Publishers. Based on my experience in the neuroscience field, this indicates the journal is of poor quality, and scholars who publish in it generally cannot count those papers towards their performance review.
9. Despite his claims to the contrary, Hilton has not published a "peer-reviewed paper" about our 2013 Steele et al. paper. Rather, Hilton submitted a letter to the editor, which contained no data and is not subject to peer-review. In his short letter, Hilton stated "The Steele et al. paper had no control group of any kind." We used a within-subject control, which is statistically superior to a between-subject control. I cover this in my Research Methods class for undergraduates. Further, Hilton stated that our large-sample neuroscience paper "fails to comprehend the truth". This bizarre statement represents a lack of training in model testing, the purpose of science, which can conclude only "support" or "falsification" for models. The journal offered us the opportunity to respond to his letter, as is customary. Given Hilton's obvious failure to offer any credible critique of our research, my co-authors (5 PhDs and MDs in addictions) and I agreed to decline to respond to Hilton's short letter.

I do not consider Dr. Hilton a "rival" neuroscientist, because he does not practice in the field of neuroscience. I am unaware of any neuroscience body that recognizes Hilton as having any expertise in the field of neuroscience. To my knowledge, Hilton has never spoken at any neuroscience or sexuality research conference. I have seen no evidence to

support that he has expertise in this area. Thus, there is no basis for Hilton's contention that I filed any complaints against Hilton based on a rivalry in the field of neuroscience.

10. I sought additional clinical and statistical training. As a result, I am both licensed to treat patients in California and have been a full-time statistician. Hilton has provided no evidence of additional training that would qualify him to provide mental health treatment.
11. Hilton states "Prause also posted a photo of herself posing on the red carpet with some pornography industry individuals". One of the documentary films I participated in, *After Porn Ends 2*, held a premier, in which I was photographed. This is the picture that Hilton claims was taken at an awards show for pornography performers. Contrary to Hilton's claims, the documentary film covered the positive and negative aspects of individuals who were adult industry performers, directly counter to his claims that this photograph would somehow support the adult industry. Hilton was aware of this before filing this lawsuit. As reflected in my prior declaration, I provided this clarification to journalist Chad Sokol when responding to Hilton's claim that I had attended the Adult Video Awards.
12. I am considered an expert on sexual harassment. I have been educated on, studied, and conducted peer-reviewed research in the field. I was responsible for writing and editing the "sexual harassment" section of a paper on the challenges of women specifically in the discipline of psychology:

Gruber, J., Mendle, J., Akinola, M., Atlas, L., Ayduk, O., Barch, D. M., . . .Prause, N.,...Williams, L. A. (2019). The future of women in psychological science. *Manuscript for publication*.

In our paper we define sexual harassment as "including unwelcome sexual advances, sex-based "put downs," (e.g., derogatory labels, sexist comments and jokes), and sexually crude displays (e.g., pornography)" with the most common forms in academia "including inappropriate comments about body, behavior, or appearance". The main reason women do not report sexual harassment is due to fear of retaliation. Based on my experience, training, and research, Hilton's history of commenting on my alleged love of pornography, and collaboration with individuals who have harassed and stalked me in the past, constitute sexual harassment:

 - a. Hilton has repeatedly referred to my appearance and posted suggestive, personal photos of me in evening gowns without my permission as a regular

feature for the last 7 years during his talks. In his public speeches, which are posted on the Internet, Hilton claims I “wanted” him to show photographs of me and that I “want[ed] to be represented this way,” referring to images of me in an evening gown. I do not own any such photographs or rights to such photographs, and have never provided such photographs. I do not give Hilton permission to post photographs of me in evening gowns at religious conferences or anywhere else. In my opinion, presenting personal images of me in professional settings claiming that I “wanted it” because of how I am dressed is sexual harassment.

- b. Hilton states on film that I “love” and “use” pornography. Hilton further claimed that my personal masturbation practices prohibit me from being able to evaluate science in this area. Hilton has no source for such insinuations of claims about my personal sexuality. In my opinion, falsely commenting on my personal sexuality to denigrate my ability to perform my job constitutes sexual harassment.
- c. Hilton repeatedly, publicly claims that I am a “porn prof”, a “porn producer”, and “involved in pornography.” He even has repeatedly shown two images of me, claiming I am posing with pornography producers. None of the images he has shown include images of me with pornography producers. I have never been involved in producing pornography. In my opinion, repetitively, publicly claiming that a female scientist works in pornography is sexual harassment.
- d. Hilton has also sexually harassed me by repeatedly claiming that I attend the Adult Video News (AVN) awards. To my knowledge, AVN only sends tickets to people in the pornography industry. Examples of his verbatim claims regarding AVN include:
 1. “I’m still trying to sort out Gary Wilson’s claim that you attended the AVN awards. This is the photo he and Donald Hilton are citing.” from reporter Chad Sokol.
 2. “This website for Liberos, Nicole Prause’s company, has a media kit. The photo of Nicole Prause with performers and producers at the annual AVN award is in this media kit.” This is in a paper posted 50 times around the Internet. See Hilton’s Self Published Paper, attached hereto as Exhibit 1(C).
 3. “Nicole Prause, this is on Twitter, where she's congratulating her on this, basically they're buds. This is AVN. *This is really good.* And this is a link to an interview of Nicole Prause on her show where she's talking

about it. And notice, that, for instance, she just did another study on um, uh, basically how on the penis.” (Emphasis supplied). This is posted on the Internet.

4. “So this one as well, this one shows Nicole Prause to be a porn producer if you have problems with people attacking pornography let me know, remember, she wrote this paper, The Emperor’s New Clothes, to Melissa Hill, 'Jeanne's story I heard at AVN was amazing' Adult Video News, it's the big porn industry meeting every year. So, Nicole Prause, was at the AVN meeting. At the meeting with the big pornography industry every year.” This is posted on the Internet.
5. “And then, AVN is the other academy awards and, um, Melissa Hill, a producer, said look, um, over here, said 'Jeanne's story', Mel, um, Dr. Prause, wrote to Melissa Hill on Twitter and said 'I heard at AVN was amazing, I'll refrain'. Now, recently someone had contested that and told me 'Dr. Prause told me that she didn't go to AVN.' I'm like, well, maybe she didn't, but I, eck, uh, what do I do with that?” This is posted on the Internet.
- e. Hilton proactively contacted a public news reporter, Chad Sokol, and instructed Sokol to contact me repeatedly, which Sokol did by phone and email, repeatedly claiming that I was in the pornography industry. Sokol told Hilton that his accusations were false, yet Hilton continued to instruct Sokol to contact me repeatedly regarding these false allegations. Hilton claimed to Sokol to have evidence that I was involved in the pornography industry that never materialized, so Sokol refused to print Hilton’s false sexual harassment. See Sokol Email Correspondence, attached hereto as Exhibit 1(D).
- f. Hilton claims that I am friends with pornography performers, specifically Jeanne Silver, which prohibits me from being impartial in my science. In one post, in which he cites a Twitter exchange between me and Ms. Silver, Hilton states: “Nicole Prause, this is on Twitter, where she's congratulating her on this, basically they're buds.” I have never met Ms. Silver. See Silver Email, attached hereto as Exhibit 1(E). Claiming I am personally close friends with a pornography performer, Hilton commented on my personal sexual values to a public audience with the stated intention of reducing their trust of my research. In my opinion, this is sexual harassment. This also was posted on the Internet.
- g. Hilton gave a talk stating that I advocate for a performer whom Hilton claims stated “Girls in porn are holes for me to put my penis into. Nothing more. Aesthetically-shaped chunks of meat”. I consider Hilton’s claim I advocate for my own body to be a “hole” for, apparently, anti-pornography activists to “put their penis into” is sexual harassment. I have received personally-disturbing

misogynistic threats of sexual violence against me echoing Hilton's statements. This is posted on the Internet.

- h. Hilton claims I have "younger and younger people watching porn!" I would never show a child pornography and have advocated for the exact opposite numerous times publicly. See Ley Declaration, attached hereto as Exhibit 1(F). I consider this false claim about my alleged advocacy of pornography for children is sexual harassment. This is posted on the Internet.
- i. Hilton stated "And this is a link to an interview of Nicole Prause on her show where she's talking about it. And notice, that, for instance, she just did another study on um, uh, basically how on the penis. And it's a 3D study and she published in a peer-reviewed journal. I'm not making this up. Nicole Prause." I conducted a study on dyspareunia, the pain that women often experience during sexual intercourse, and the partner factors that might contribute to their pain experience. Hilton stating that I am printing phalluses with no purpose is sexual harassment. This is posted on the Internet.
- j. Hilton stated I was "being promoted by AdultEmpire, which is a MindGeek subsidiary". I have never been paid by or received any support from any pornography company. I consider this false claim about my personal sexuality and/or affiliation with the pornography industry to be is sexual harassment. This is posted on the Internet.
- k. Hilton stated "MindGeek, I talked about them earlier, it's basically the monopoly, a porn monopoly, of the world, and, like the site that is promoting Nicole Prause they're all under MindGeek. So these porn professionals are promoted by MindGeek." It is sexual harassment to denigrate my professional capabilities by implying that I participate in producing or perform in pornography as a "porn professional". This is posted on the Internet.
- l. Hilton stated that I claim "the problem is that we don't just accept it and embrace any kind of sexuality any time, anywhere with anyone. They have no problem with the immense profits of the porn industry". This claim about my personal sexuality is sexually harassing. I have never made this statement and these are not my values. This is posted on the Internet.
- m. Hilton stated "Nikky Prause who runs that lab trained at the Kinsey Institute". After claiming my professional affiliation, Hilton goes on to claim "So this is direct collaboration. Kinsey and his coworkers coerced and cooperated with and collaborated with people like Belusic, the Nazi pedophile, and Rex King, the American pedophile, and they collaborated with them and taught them how to time their abuse" "So understand the Kinsey Institute and what they do". As a trainee and employee of the Kinsey Institute, I did not participate in the molestation of children as part of my research. See Janssen Letter, attached hereto as Exhibit 1(G). The Kinsey Institute had the same false claim

filed by Hilton's collaborator, Judith Reisman, dismissed with prejudice from Indiana courts in 1994 because it was false. Hilton provided the exact same "Table 34" as Judith Reisman did in Indiana in his Texas court filing as evidence of my training in child molestation. As shown in my prior declaration and the Declaration of Cameron Staley, Hilton has made the same claim that I molested children to Dr. Cameron Staley in person. This implication that I molest children based on my employment with the Kinsey Institute is a false statement about my personal sexuality, which is sexual harassment. This is posted on the Internet.

- n. Hilton continues to claim that I attended the AVN awards to suggest I am personally involved in pornography. Emails from Melissa Hill and Jeanne Silver verified that my 2015 Tweet could have had nothing to do with my attending the AVN awards, as shown in my prior declaration. In addition, Shelley Bartolini now verifies that I have never been at the AVN awards. See Bartolini Declaration, attached hereto as Exhibit 1(H). Finally, during the 2019 AVN awards I was collecting data all weekend for a study in California, supported by receipts for ATM withdrawals in Los Angeles, an electronic research calendar showing research conducted at my Burbank testing space, a log on to my University of Pittsburgh Box account from a Los Angeles IP, and a car rental in Los Angeles to transport equipment with mileage only suitable for nearby Burbank, not Las Vegas where AVN 2019 was held. See Receipts in Los Angeles during AVN, attached hereto as Exhibit 1(I). It was impossible for me to have attended the AVN awards as Hilton continues to falsely claim to the court based on intentionally malicious interpretations of mere tweets.

13. In addition to making these sexually harassing statements, Hilton also claims that I only publish positive aspects of pornography. This is false. In fact, I published an intervention to help people manage sexual urges that felt out of control, which became the first ever to implement brain stimulation to alter sexual excitability:

Prause, N., Siegle, G. J., Deblieck, C., Wu, A., & Iacoboni, M. (2016). EEG to primary rewards: Predictive utility and malleability by brain stimulation. *PLoS one*, 11(11), e0165646.

In addition, numerous public statements show me expressing negative aspects of pornography effects. Some examples include:

"Both positive and negative emotions increased following sexual stimulus exposure consistent with previous research"

- Staley, C., & Prause, N. (2013). Erotica viewing effects on intimate relationships and self/partner evaluations. *Archives of sexual behavior*, 42(4), 615-624.

“Of course, there are real concerns about the medium that should be addressed. One concern we share about adult films is that the adult entertainment industry, while regulated like any other legal business, can attract trafficking victims or unscrupulous agents. Another concern we share is that sex education in the U.S. is so poor that younger children may struggle to understand that sex films are fiction, not documentary.”

- Klein, M., Kohut, T. & Prause, N. (2018). Why are we still so worried about watching porn? Slate.com <https://slate.com/technology/2018/07/why-are-we-still-so-worried-about-watching-porn.html>

“We agree that sex films do generate some cause for concern. For example, as an ethical matter, people should not be exposed to sex films without consent. We are actively researching methods to help distressed people manage their sexual urges.”

- Prause, N., Pfaus, J., Blaine, S., Georgiadis, J., Kieffaber, P., Janssen, E., Cantor, J., & Hoffmann, H. (2016). Anti-porn program misrepresents science, Salt Lake Tribune. <https://archive.sltrib.com/article.php?id=4680276&itype=CMSID>

14. Hilton continues to falsely assert that I advocate for children to view pornography. In support of this claim, he altered my published statement, and provided the inaccurate, altered statement to this Court. Specifically, Hilton lied that one of my published papers includes the following statement: “One possibility is that those with higher sexual sensation seeking use VSS at younger ages and broaden the content of their VSS when sexual partners are not available to them to engage in actual sexual risk behaviors.” Hilton claims that his statement shows that I have recommended for children to view pornography. However, the statement from my papers actually does not end with that period, it ends with a citation to “[154].” 154 is the citation for:

Seigfried-Spellar KC, Rogers MK. Does deviant pornography use follow a Guttman-like progression? *Comput Hum Behav*. 2013;29(5):1997–2003.
doi:10.1016/j.chb.2013.04.018.

In other words, that sentence was never a recommendation for minors to view pornography, it was a statement of fact made by another author whom we were quoting. Hilton has misquoted our paper to create the false impression that I advocate for minors to use pornography. The lead author, Dr. David Ley, verifies that Hilton made false

statements in his presentations to religious organizations and to this Court by altering the sentence from our paper. See Ley Declaration, attached hereto as Exhibit 1(J).

I have stated dozens of times in media and in my science that it is illegal for minors to view pornography and it should be discouraged. See, e.g., Prause, N. (2019). Porn Is for Masturbation. Archives of Sexual Behavior, 1-7, attached here to as Exhibit 1(K). In this paper, I write "VSS viewing by youth is illegal in the USA and most of the world, so it would never be appropriate to encourage youth to view VSS."

15. When I became aware of Hilton's communications with journalist Chad Sokol, I learned that Hilton was working with Gary Wilson. Although Hilton claims he does not follow me on social media, it appears that Hilton obtained the photographs that he sent to Sokol from Gary Wilson. A reverse Google image search shows the exact images provided in this lawsuit were provided by Gary Wilson from his website yourbrainonporn.com. In his statement, Hilton admits that he obtained my old tweets from Wilson. Wilson also posts extensive false claims that I am in pornography. For example, Wilson falsely claims, that I write for a pornographic website hosted by Mike South, whom I actually do not know. See South Email Correspondence, attached hereto as Exhibit 1(L).
16. By working with Wilson and claiming that I am involved in the pornography industry, Hilton knew or should have known that I have been forced to file multiple complaints against Gary Wilson for stalking, harassment, computer intrusion, and criminal threats since 2013. These reports to law enforcement were publicly available, as Gary Wilson posted them on his website www.yourbrainonporn.com, to which Hilton contributes. Although Wilson claims that these reports do not exist and were never filed, I have obtained the reports directly from the FBI. See Freedom of Information/Privacy Act Response for Records of Reports against Gary Wilson and Alexander Rhodes, attached hereto as Exhibit 1(M). Hilton and Wilson also have written and presented together in their anti-pornography activism. Hilton's collaboration with Wilson, who has physically stalked, cyber stalked and harassed me in the past, caused me to fear that Hilton also intended to harass me further and was supporting Gary Wilson's escalating behaviors.
17. Wilson has a documented history of stalking me. As a result, I qualified for California's Safe at Home Program, and solicited a no-contact order against Wilson. Wilson has filed complaints with UCLA regarding me, which UCLA investigated and rejected as false. I have also filed a cyberstalking report with the FBI against Wilson. A chronology of these events is as follows:
 - a. April 12, 2013. Following a barrage of emails from Gary Wilson, I instructed him to never contact me again. He has violated this no-contact order at least 50 times.

- b. July 3, 2013. Psychology Today editor Lybi Ma instructed Wilson and his wife Marnia Robinson to stop posting false information about me on their Psychology Today column. Wilson and Robinson posted another defamatory column, so Lybi Ma permanently cancelled their Psychology Today column due to their harassment and libel.
- c. July 22, 2013. Gary Wilson created a Google map from his home address in Ashland, Oregon to drive to my laboratory at UCLA. I contacted police (incident #2013-047636) at the University of California, Los Angeles (UCLA). I alerted all of my staff with Wilson's photo by email to immediately call police if they saw him. I closed the lab for two weeks, instructing my research assistants to work remotely.
- d. July 30, 2013. Gary Wilson and his wife sent nearly 100-page complaint about me to UCLA. UCLA was unable to verify any of their claims and dismissed it.
- e. July 24, 2013-August 3, 2013. Wilson posted a private photograph of me on his website that required three DMCA notices to have removed, as he kept migrating the image each time it was legally removed.
- f. July 30, 2013 I filed a cyberstalking report with the Federal Bureau of Investigation (FBI) regarding Gary Wilson. See Exhibit 1(M).
- g. October 18, 2013. Gary Wilson and his wife Marnia Robinson sent another complaint to UCLA claiming that I fabricated my data and was harassing them. The university found this complaint was false and responded to Wilson and his wife Robinson that was the case on November 8, 2013.
- h. December 2, 2013. Gary Wilson and his wife Marnia Robinson sent yet another complaint to UCLA with false claims. UCLA also dismissed these false claims on March 4, 2014 after repeated contact by Wilson demanding "answers".
- i. December 16, 2013 I filed a cyberstalking report with the FBI regarding Gary Wilson due to his increasing violations of my no-contact request and harassment with UCLA. See Exhibit 1(M).
- j. February 3, 2014. Gary Wilson appeared on white supremacist show Gnostic Media on DailyStormer (<https://dailystormer.name/gnostic-media-podcast-an-interview-with-gary-wilson-this-is-your-brain-on-porn/>)
- k. September 24, 2015. Following further escalation of unwanted contact, I filed a protective order against Gary Wilson in Oregon. The Oregon courts stated that it needed to be filed in Los Angeles. I was concerned that Wilson would use that appearance to discover my home address, and declined to move the filing to Los Angeles.
- l. October 15, 2015. I hired an attorney, Jed White, JD, to send a cease and desist letter to Gary Wilson and his wife Marnia Robinson to stop their defamation and to stop contacting me. See Cease and Desist Correspondence, attached hereto as Exhibit 1(N).

- m. October 27, 2015. Gary Wilson contacted the UCLA Office of Intellectual Property requesting information about my company's participation in their startup program.
- n. March 2016. Someone tried to gain entry to my home, asking where my unit was using my name, but they were stopped by the management company.
- o. March 10, 2016. I ordered and installed security hardware for my home due to Wilson's continued harassment and fear that he had physically located my home.
- p. April 5, 2016. I required security at a public talk at a Jewish center in San Francisco from fear Gary Wilson would try to attend or send white supremacists to attack the center.
- q. April 12, 2016. Gary Wilson and Marnia Robinson contacted UCLA after they knew I no longer worked there, demanding that UCLA investigate me, demanding that UCLA publicly denounce me, claiming UCLA was being naïve and making additional false claims. UCLA also found no grounds for these.
- r. August 9, 2016. I required security from Gary Wilson at a talk for the American Association of Sex Educators, Counselors, and Therapists.
- s. October 4, 2016. Gary Wilson joked on Twitter about physically stalking me.
- t. December 2016. Gary Wilson and Stefanie Carnes sent identical complaints to the California Board of Psychology against my professional license making false allegations already reviewed and dismissed by UCLA. The Board of Psychology has informed my attorney and I that there are no negative findings. No patients were ever involved. The board concluded the complaints were low priority. Wilson continues to regularly post publicly that I am "under investigation by the state of California" without admitting he filed the fraudulent complaints himself in an obvious abuse of state resources.
- u. June 12, 2017. A Gary Wilson follower posts that I should be raped.
- v. September 1, 2017 Gary Wilson appeared on white supremacist show Stefan Molyneux (<https://www.youtube.com/watch?v=mhqx7yctQVk>) and extensively promotes this show on his Twitter @YourBrainOnPorn.
- w. January 18, 2018. Gary Wilson was ejected from a scientific conference, the annual conference of the European Society for Sexual Medicine, by their attorney prior to the conference start when they discovered his true background. He was not giving a keynote address as he claimed. I had just given an actual keynote address at this conference, so Wilson knew I was attending. I had no control over their decision to eject him.
- x. March 7, 2018. Gary Wilson is banned from the Quora platform because he created a second fake account to stalk my own account. This was a violation of their terms of service.

- y. April 22, 2018. Wilson appeared uninvited to a Behavioral Addictions meeting in Cologne, Germany, scaring a number of scientists in attendance who discussed security concerns regarding his presence.
- z. April 25, 2018 I reported these escalations to physical stalking to the Los Angeles Police Department (LAPD) report # 180809436 and the FBI. See Exhibit 1(M).
- aa. August 31, 2018. I required security from Gary Wilson at a talk for the Society for the Scientific Study of Sexuality where I would be debating Dr. Marc Potenza regarding sex addiction.
- bb. February 19, 2019. Gary Wilson and his wife Marnia Robinson contacted the National Organization of Rare Diseases (NORD) requesting that my competitive grant from them, which had nothing to do with pornography, be rescinded. NORD requested my assistance in getting Wilson and Robinson to stop harassing them, as the pair continued to email NORD over and over.
- cc. Feb 22, 2019. Gary Wilson tells reported Chad Sokol with Donald Hilton that I am involved in the pornography industry and attended the AVN awards.
- dd. April 11, 2019. Wilson emailed my colleague Dr. Michael Seto, claiming to have proof I was involved in the pornography industry.
- ee. April 19, 2019. I received a series of anti-Semitic, misogynist death threats through a forum on Psychology Today. See Psychology Today Emails, attached hereto as Exhibit 1(O).
 - a. April 22, 2019. I filed a report with the FBI for these death threats describing Wilson's history of appearing on white supremacist shows.
 - b. April 22, 2019. Detective Perez determined that these were new causes of action and requested that I file a criminal threats complaint with LAPD. My report was assigned Incident No. 190423001757, and it remains under investigation with Gary Wilson as the only known person of interest.
 - c. May 9, 2019. I hired an attorney, Wayne Giampetro, JD, to send a cease and desist letter to Gary Wilson to stop his new defamatory claims.
 - d. May 28, 2019. I called 9-1-1 because I believed the process server attempting to serve me with this lawsuit was connected to Gary Wilson. Knowing that Hilton now had my home address and could tell Gary Wilson where I lived, I gave notice to my apartment manager the same day that I would be moving.
 - e. June 13, 2019. Wayne Giampetro, JD, sends another cease and desist letter to Gary Wilson to stop his new defamatory claims.
 - f. June 21, 2019. The American Civil Liberties Union instructed Gary Wilson in a letter to stop threatening myself and a group of scientists and therapists with malicious, unfounded litigation. See ACLU Correspondence, attached hereto as Exhibit 1(P).
 - g. July 1, 2019. I relocated my home again due solely to fear of Wilson's stalking because Donald Hilton, who works with Wilson, had my home address.

- h. July 4, 2019. Wilson and Robinson receive legal service of Mr. Giampetro's Cease and Desist letter at their home in Ashland, OR. See Service of Cease and Desist, attached hereto as Exhibit 1(Q).
- i. July 18, 2019. Wilson filed a World Intellectual Property Organization complaint against me for a website that he knew I did not own, requiring me to hire an attorney again to prove that I did not own the website.
- j. July 30, 2019. Wilson spoke for over an hour on an anti-pornography show about this lawsuit (<https://www.youtube.com/watch?v=Omjgpu0munw>). Wilson stated about my colleagues and me, "I hope they are watching...because they will never stop me." I reported his threat to the LAPD detective investigating the criminal death threats and the Los Angeles prosecutor.
- k. August 17, 2019. A group of past board members with whom I have no affiliation sent the Society for the Advancement of Sexual Health (SASH) a letter of concern for their involvement with Gary Wilson echoing my concerns. Their letter states:

Dear SASH Board:

As a group of former board members, we wanted to raise serious concerns about the involvement of Gary Wilson and his wife Marnia Robinson in the organizational leadership. It is our belief that core to SASH's values has always been the scientific and clinical objectivity to explore a variety of different aspects to problematic sexual behaviors. During our tenure, we strove to move away from one singular model to be inclusive and to invite others into discourse, many of whom we did not always agree with. All along, our goal was to improve our understanding of the field.

Many of us left SASH when Mr. Wilson and Ms. Robinson joined SASH. While the reasons are multifactorial, one of our concerns was the direction SASH was taking, once again, to be restrictive and insular. Mr. Wilson will only engage in academic discourse through his blog. He does not publish his own studies. He actively requested that the publication of the special edition of SAC be halted, rather than contribute a letter to the editor or publish his own research. More concerning, information has come to light about potential integrity and affiliations. I have attached documentation that is widely available in the public domain and have been circulated on social media. Finally, we are concerned that Mr. Wilson and Mrs. Robinson are utilizing SASH to propagate their agenda as opposed to fully embracing the mission of SASH.

We believe Mr. Wilson and Mrs. Robinson should be asked to answer the following questions to the board:

- 1) What are Mr. Wilson's credentials? How does he respond to criticism that he misrepresents those?

2) What is Mr. Wilson's relationship with certain members of known hate groups? Why did he feel it was appropriate to promote his work through those channels?

3) Are Mr. Wilson and Mrs. Robinson open to discussion of alternative perspectives on pornography? Where does that fit in to the trainings developed by SASH?

Our goal is to help preserve the reputation and integrity of an organization we worked incredibly hard to create. We fully acknowledge it is up to the current leadership to determine the role Mr. Wilson and Mrs. Robinson play in the organization. However, we could not remain silent about these concerning issues.

Sincerely, [6 signatories]

- i. August 24, 2019. Wilson submitted Hilton's response to this court to Google Scholar for indexing. See Google Scholar Documents, attached hereto as Exhibit 1(R). Google scholar is the main resource scientists use to find peer-reviewed articles. It does not index pdfs from a website unless they are submitted for indexing. This means that scientists using this resource to search for research that I have conducted will, instead, find this defamatory court filing. The link also will be emailed to thousands of people, if not millions, who subscribe to receive Google Scholar alerts.
- m. August 25, 2019. Wilson broke in to the website of my colleague Daniel Burgess and posted instructions publicly for others to do the same. We filed another report to the FBI and updated the Los Angeles police detective assigned to his case. See Exhibit 1(M).
- n. August 27, 2019. Wilson publicly claimed that I and over 20 other professionals committed felony computer hacking by accessing his website to post pornographic links referring to "Mormon" pornography of young girls in 2016 and 2017. Wayne Giampetro, JD had to send another Cease and Desist to stop Gary Wilson's latest false claims against us. See Exhibit 1(N). Wilson has filed no known report to law enforcement regarding this supposed felony I/we committed.
- o. September 12, 2019. The World Intellectual Property Organization ruled against Gary Wilson's complaint against me.

18. Hilton, who provides content for Wilson's website, knew or should have known that he was promoting Wilson's harassment of me by working with Wilson, as Wilson has made several disparaging and harassing comments about me around the Internet:

- a. "Miss Prause is the head of UCLA SPAN lab" (from yourbrainrebalanced.com removing my doctorate, referring to marital status)
- b. "Miss Prause is the head of UCLA SPAN lab" (from jsparkblog.com removing my doctorate, referring to marital status again)
- c. "Nicki" (misspelling of a nickname removing my doctorate)
- d. ~~Neuroscientist~~ Nicole Prause [deleted "Neuroscientist" from published article reproduced]
- e. "Ley's sidekick Prause"

19. To date, my name is on Gary Wilson's website www.yourbrainonporn.com 9,710 times, he has over 100 unauthorized images of me on his website www.yourbrainonporn.com, including the one used by Hilton in his public talks about my sexuality, and has placed my name with his website link over 103,000 times on the Internet. See Prause Mention Data for Wilson Website, attached hereto as Exhibit 1(S). Wilson described my physical location on his website, including:

- a. "Note: Rory Reid's UCLA office is right next door to Prause's (and the two used to be roommates)"
- b. "females willing to act as sexual guinea pigs in Prause's Hollywood Blvd office"

Wilson's website www.yourbrainonporn.com falsely accuses me of a variety of criminal acts that have never been filed with law enforcement. For example, Gary Wilson falsely claims on his website www.yourbrainonporn.com that I secretly test "porn stars" in my laboratory, have no university affiliations overseeing my research, am supported through unreported conflicts of interest by the pornography industry, and am funded by the sexual servitude of women through a company called OneTaste. Wilson knows these statements are untrue, as he has been served with cease and desist letters from my attorneys. See Exhibit 1(M). I have never tested porn stars, my research is overseen by federally-regulated, public university ethics review panels with which I have an affiliation (University of Pittsburgh, University of Nebraska-Lincoln), I have no support from the pornography industry, and none of my research is, or has ever been, funded by the OneTaste company.

20. In addition to working with and promoting the Gary Wilson, Hilton also works with Judith Reisman. Judith Reisman has made false and disparaging statements about the Kinsey Institute and the International Academy of Sex Research, a group of scientists studying sexuality from across the world. I have attended meetings of the International Academy of Sex Research for years and am an elected member. Reisman and Hilton work closely together. They both promote the existence of "erotoxins," which they claim are present in the brain after one views pornography, although no such substance has been proven to exist. Both are in the Lighted Candle Society, a religious anti-pornography activist

group. Hilton is extensively interviewed on Judith Reisman's website. Reisman also has regularly threatened my safety and the safety of my colleagues:

- a. Claimed everyone at The Kinsey Institute was involved in the sexual molestation of children. See Stuhlhofer Declaration, attached hereto as Exhibit 1(T); Letter from Indiana University, Bloomington, attached hereto as Exhibit 1(U).
- b. Attempted to incite others to protest our scientific meeting in person by claiming that we were involved in sexually molesting children. See Exhibit 1(T).
- c. Created a Facebook group posting that every member of the annual meeting of the International Academy of Sex Research in Croatia that year should be murdered. I was a speaker at that meeting. See Exhibit 1(T); Graham Declaration, attached hereto as Exhibit 1(V). Some declined to attend the meeting due to her threat of violence. See Exhibit 1(V).
- d. Filed a fraudulent lawsuit against the Kinsey Institute claiming that we were involved in sexually molesting children and child pornography. Her lawsuit was purely harassment and was dismissed with prejudice. See Exhibit 1(U).

21. In the course of addressing Hilton's various claims regarding me, I became aware that he frequently worked and collaborated with Gary Wilson and Judith Reisman. I also became aware that Hilton claimed to have an MD. I was aware that he reported living in Texas. I used the Texas Medical Board license lookup (<http://www.tmb.state.tx.us/page/look-up-a-license>) and identified that Hilton was licensed as a physician in Texas. I further found that a complaint process was available to formally petition the Texas Medical Board to initiate an official proceeding. "The Texas Medical Board receives and reviews over 7,000 complaints a year from patients, patient family members, health care professionals and other sources." Also, "The most frequent complaints involve issues related to standard of care, professional incompetence, unprofessional conduct which may endanger the public, and inability to practice medicine by reason of mental or physical impairment." (<http://www.tmb.state.tx.us/page/enforcement>). This led me to believe that I qualified to petition the Texas Medical Board and file a complaint.

Specifically, Hilton was claiming that I was involved in child molestation and the pornography industry, claimed "porn addiction" and "sex addiction" were recognized diagnoses, and was promoting Gary Wilson, against whom I had been forced to file multiple FBI and police reports for stalking and criminal death threats against me. Hilton also created content for Wilson's website yourbrainonporn.com against me, where the FBI and police reports were described. Although Hilton knew that Gary Wilson had been

reported numerous times to law enforcement for harassing, stalking, and threatening myself and others, Hilton supported Wilson. Hilton asked Wilson to post his interview on Wilson's website, which Wilson did. Hilton also received the images of me in his talks from Gary Wilson and worked with Gary Wilson to try to get reporter Sokol to report that I was personally involved in pornography. Finally, Hilton has sent the lawsuit documents to Gary Wilson before they were publicly available for all three filings, which Wilson did post on both his website (www.yourbrainonporn.com) and his wife's website (www.pornstudycritiques.com), never with my response. Wilson further submitted Hilton's statement to Google Scholar, which would result in Hilton's statement to the court being emailed to thousands of scientists.

22. In my petition to the Texas Medical Board, I reported to the Texas Medical Board that Hilton was:
- a. Disseminating research results which he knew to be false <https://www.ama-assn.org/delivering-care/ethics/code-medical-ethics-research-innovation> in violation of rules for disseminating research. See Staley Declaration, attached to prior Motion to Dismiss; see also Exhibit 1(A).
 - b. Disseminating information about me that he knew to be false in violation of <https://www.ama-assn.org/sites/ama-assn.org/files/corp/media-browser/code-of-medical-ethics-chapter-10.pdf> in violation of physicians promoting "core team values of honesty" and failure to use recommended "institutional ethics committees" which were freely available to him. See Exhibit 1(F); 1(U).
 - c. Violating my sexual boundaries by publicly claiming I personally masturbate to pornography, enjoy pornography, am personally involved in the pornography industry by attending the Adult Video News Awards, attended events with "porn producers" individuals who have never produced pornography, in violation of <https://www.ama-assn.org/delivering-care/ethics/code-medical-ethics-professional-self-regulation> which includes "verbal or physical conduct of a sexual nature" that "may influence or be perceived as influencing professional advancement in a manner unrelated to clinical or academic performance harm professional working relationships". See Exhibits 1(E); 1(H). Hilton's claims about my personal sexuality fit within the definition of sexual harassment. See Exhibits 1(F); 1(V).
23. The Texas Medical board was not responsive to my petition. I submitted my complaint on February 22, 2019 and received an electronic receipt. The board did not mark my complaint as received until May 2019. Given that the sexual harassment by Donald Hilton was ongoing, I was forced to consider other remedies to stop Hilton's sexual harassment during this delay.

24. Hilton appeared nowhere on the faculty page for the University of Texas Health Sciences Center San Antonio Department of Neurosurgery, where he claimed to work. Hilton appears nowhere in the online directory for the University. I sought to verify his standing at the University of Texas Health Sciences Center by initiating a formal FOIA proceeding and using a Freedom of Information Act (FOIA) Request submitted on April 24, 2019 using the appropriate university portal. See FOIA Response from UT Health-SA, attached hereto as Exhibit 1(W). I received the response on May 8, 2019. The response to my FOIA request from the university stated "The University of Texas Health Science Center at San Antonio has no records reflecting that Donald Hilton, M.D. is now or ever has been an employee of the University." Based on this information, it appeared Hilton may have been falsely presenting himself as an employee. I accurately reported this FOIA to the journal editors, and included the complete FOIA response as an attachment in my accurate reports to journal editors.
25. Hilton had claimed he was an adjunct professor at the University in several journal articles. I contacted the appropriate editors for the *International Journal of Neurology* and *Surgical Neurology International*, accurately stated the FOIA information, and included the complete FOIA response as an attachment. My accurate statements are clearly reflected by the journal request Hilton himself provided. The journal editors requested verification from the university, given that a FOIA indicated no relationship, yet Hilton was declaring that he had such a relationship. Both journal editors agreed with me that the FOIA response required further investigation of Hilton's claimed affiliation with UT Health.
26. On May 16, 2019 I received an email from Jim Cook, the managing editor of the *Surgical Neurology International*. It included a forwarded email from John R. Floyd, MD, Chair of the Department of Neurosurgery to Mr. Cook confirming that "Although Dr. Hilton is not a UT Employee[.]" Instead, Dr. Floyd stated Hilton "has held a clinical Adjunct Appointment in the Department of Neurosurgery, and has been involved in the ACGME accredited training program since about 2007." Hilton's Amended Complaint against me describes this as a "volunteer" position.
27. Based on Hilton's status as a volunteer adjunct professor, I contacted the university and sought to file a formal petition or complaint to institute an official investigative or disciplinary proceeding.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on September 12, 2019.

A handwritten signature in black ink, appearing to read "Nicole Prause", is written over a horizontal line.

Nicole Prause, Ph.D.

STATE OF CALIFORNIA §
 §
COUNTY OF LOS ANGELES §

DECLARATION OF JAMES CANTOR, PH.D.

1. My name is James M. Cantor, Ph.D., C.Psych., and I am both a research scientist and clinical psychologist registered in my home province of Ontario, Canada. I earned my Doctor of Philosophy (Ph.D.) degree in Clinical Psychology from McGill University. Until last year, I was an Associate Professor in the Department of Psychiatry of the University of Toronto's Faculty of Medicine and the Head of the Law and Mental Health Research Section of the Centre for Addiction and Mental Health. I left that position to open a full-time clinic and consulting practice in 2018.
2. I am also past Editor-in-Chief for the scientific journal *Sexual Abuse*, and currently serve on the editorial boards of the *Journal of Sexual Aggression*, the *Journal of Sex Research*, and *Archives of Sexual Behavior*.
3. My expertise is in the neuroscience of human sexuality. I have published widely in peer-reviewed journals my research on animals and on human behaviour, spanning neurochemistry, neuroanatomy, as well as clinical applications. My best known research pertains to atypical sexualities, especially my MRI studies of pedophilia and the typology and classification of hypersexuality problems (variously labelled 'sexual compulsivity' or 'sexual addiction').
4. I first met Dr. Prause over ten years ago at a scientific conference. Although we have never directly collaborated on any research projects, I have long been familiar with her research and career. She is a widely recognized neuroscientist and psychophysiological in our field.
5. Dr. Prause informed me that Dr. Hilton appeared to present MRI images from my own research in men with pedophilia during a public talk he gave in 2009. Reportedly, Hilton claimed that these were published MRIs of "pornography addicts" and that these MRI images proved that "pornography addiction" was "real."
6. Although I am not a witness to Dr. Hilton's statement, its contents are necessarily false: In 2009, there simply did not exist any MRI studies of "pornography addicts" (however labelled). Presenting MRI images of pedophiles from my study as "porn addicts" would be entirely inaccurate, if not outright fraudulent. These populations are entirely distinct, with distinct causes, distinct symptoms, and distinct needs for appropriate treatment. There do exist viewers/perpetrators of child pornography offenses who self-label as sex addicts in order to forestall the much more stigmatizing diagnosis of pedophilia, and this has led to some confusion. Such claims do not, however, reflect either the scientific



consensus or clinical reality. Child molestation and child pornography are illegal. Consenting adults viewing pornography depicting adults is not. These behaviours are not comparable, either scientifically, clinically, or legally. Moreover, there is no basis to any reported claims that pedophiles view pornography more than do the mainstream, non-pedophilic public. In none of my studies of pedophilia could the study participants be described as “porn addicts” or “sexually compulsive” or “hypersexual” or similar. Despite that my career has long kept me in contact with nearly every neuroscientist in the world studying human sexual problems, I am unaware of any who would describe pedophiles as “porn addicted” or similar.

7. In science, we do not claim that a study “proves” a theory. We use term “support” to reflect the principle that the some future study may always falsify (or fail to replicate) an earlier one. Describing studies in that way would reflect a basic misunderstanding of the scientific process.
8. The *Association for the Treatment of Sexual Abusers* (ATSA) is the largest international organization of scientists, therapists, and law enforcement professionals developing and implementing effective treatment for sex offenders and prevention of sexual abuse. In 2017, ATSA released a public statement explicitly distinguishing sex abuse from sex addiction, emphasizing that mistaking sex abuse as a sex addiction will prevent the abusers from receiving the types of treatments they actually require (<http://www.atsa.com/sex-addiction-sexual-abuse-and-effective-treatment-0>). These cannot be considered interchangeably.
9. Dr. Prause provided Dr. Hilton’s curriculum vitae to me from a previous court filing. He does not appear to have any training in neuroscience, nor could I identify his participation in any recognized activities of neuroscientists, such as scientific conference talks, grant funding, or data collection. Medical education does not typically include training in research methodology or the advanced statistics required to perform image analysis in neuroscience. Dr. Hilton does not appear to be a neuroscientist.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on September 9, 2019.



James M. Cantor, Ph.D.

Hilton's anti-pornography book is self-published not scholarly

Hilton's anti-pornography book was published by Forward Press

He Restoreth My Soul
(Kindle Edition)
by Donald L. Hilton Jr.
MD

★★★★★ (103)
Kindle Edition \$9.97

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Book sections

Cover

Beginning

*Understanding and Breaking the Chemical and Spiritual Chains of
Pornography Addiction Through the Atonement of Jesus Christ*

DONALD L. HILTON JR., MD

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ISBN • 978-0-9810376-0-3

EXHIBIT
1(B)

Texas comptroller records show Forward Press is an LLC of Hilton's wife with Donald Hilton as principal

The screenshot shows the Texas Comptroller of Public Accounts website. On the left, a search for 'Taxable Entity' has yielded two results for 'FORWARD PRESS'. On the right, a detailed view of 'Franchise Tax Details' is shown for 'FORWARD PRESS PUBLISHING, LLC'. The details include the Texas Taxpayer Number (32038929082), Mailing Address (418 RIDGE TRACE SAN ANTONIO, TX 78258-6923), Right to Transact Business in Texas (ACTIVE), State of Formation (TX), Effective SOS Registration Date (02/18/2009), Texas SOS File Number (0801088298), Registered Agent Name (JANA K HILTON), and Registered Office Street Address (418 RIDGE TRACE SAN ANTONIO, TX 78258).

Texas Comptroller of Public Accounts
Glenn Hegar

Taxable Entity

2 matches found for the search string

If you have questions about the search

Results

View Details	Name
Details	FORWARD PRESS MI
Details	FORWARD PRESS PU

Franchise Tax Details

Franchise Search Results Public Information Report

As of : 09/10/2019 14:36:54

This page is valid for most business transactions but is not sufficient for filings with the Secretary of State
Obtain a certification for filings with the Secretary of State.

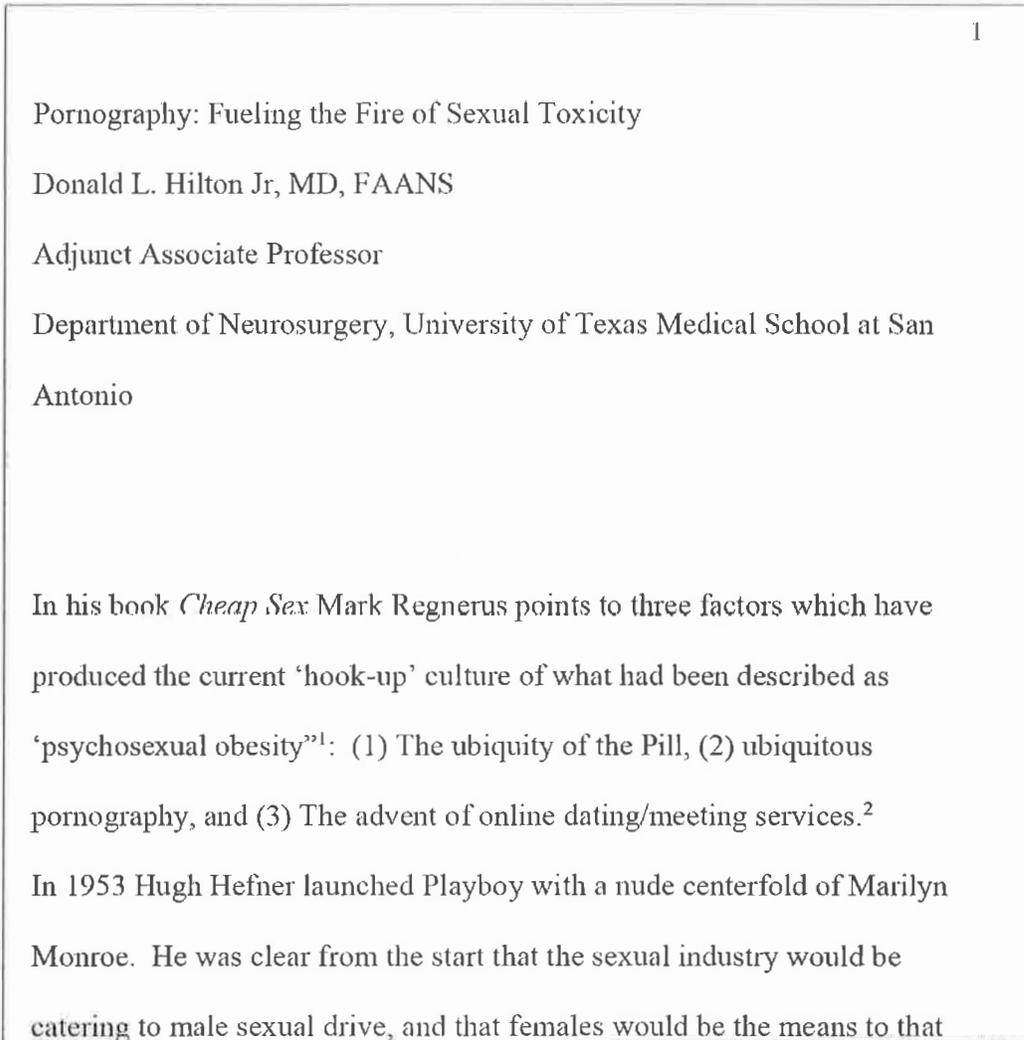
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Texas Comptroller of Public Accounts
Glenn Hegar

- Home
- Contact Us

Hilton self-published a paper with false claims regarding AVN awards and image

Title page and relevant footnote from the non-reviewed paper (yellow highlight added)



¹⁵Schmidt C, Morris LS, Kvamme TL, Hall P, Birchard T, Voon V. Compulsive sexual behavior: Prefrontal and limbic volume and interactions. *Human Brain Mapping* (2016). DOI: 10.1002/hbm.2344

¹⁶Voon, V., Mole T.B., Banca P., Porter L., Morris L., Mitchell S., Lapa T.R., Potenza M.N., Irvine M. (2014). Neural Correlates of Sexual cue Reactivity In Individuals with and without Compulsive Sexual Behaviors. *Plos One*, July 11, 2014

¹⁷ Mechelmans, D.G., Irvine, M., Banca, P., Porter, L., Mitchell, S., Mole, T.B., Lapa, T. R., Harrison, N. A., Potenza, M. N., Voon, V. (2014). Enhanced Attentional Bias towards Sexually Explicit Cues in Individuals with and without Compulsive Sexual Behaviours. *PlosOne*. DOI: 10.1371/journal.pone.0105476

¹⁸ Gola M, Wordecha M, Sescousse G, Lew-Starowicz M, Kossowski B, Wypych M, Makeig S, Potenza MN, & Marchewka A. Can Pornography Be Addictive? An fMRI Study of Men Seeking Treatment for Problematic Pornography Use. *Neuropsychopharmacology* Sept 2017, 42(10):2021-2031.

¹⁹ <https://www.yourbrainonporn.com/brain-scan-studies-pom-users#brain>

²⁰ <https://www.yourbrainonporn.com/brain-scan-studies-pom-users>

²¹ David Ley, Nicole Prause, & Peter Finn. The Emperor Has No Clothes: A Review of the 'Pornography Addiction' Model. *Current Sexual Health Reports*. DOI 10.1007/s11930-014-0016-8.

²² David Ley. *Ethical Porn for Dicks: A Man's Guide to Responsible Viewing Pleasure*. ThreeL Media, Stone Bridge Press, 2016. Endorsement on Amazon page for book: "David Ley's voice brings much-needed nuance to some of the most important conversations occurring about pornography today."—pombub

²³ <https://liberoscenter.com/media/> This website for Liberos, Nicole Prause's company, has a media kit. The photo of Nicole Prause with performers and producers at the annual AVN award is featured by her in this media kit.

²⁴ Rodriguez-Hart C, Chitale FA, Rigg R, Godlstein BY, Kerndt PR, Tavrow P. Sexually transmitted infection texting of adult film performers: is disease being missed? *Sexually Transmitted Disease*. 2012 Dec; 39(12):989-94.

²⁵ Bill Margold, pornography performer, quoted by Gail Dines. *Pornland: How Porn Has Hijacked our Sexuality*. Beacon Press, Boston 2010, pg xxvi

²⁶ Sun C, Ezzell MB, Kendall O. Naked Aggression: the Meaning and Practice of Ejaculation on a Woman's Face. *Violence Against Women*. 2016 DOI: 10.1177/1077801216666723.

²⁷ Sun C, Bridges A, Wosnitzer R, et al. A Comparison of Male Female Directors in Popular Pornography. What Happens when Women are at the Helm. <https://doi.org/10.1111/j.1471-6402.2208.00439.x>

²⁸ Tasha Reign: I Was Assaulted on a Stormy Daniels Porn Set. And She Did Nothing. *The Daily Beast*. Marlow Stern. May 14, 2018.

Hilton presented the paper at an advertised, public talk at the Medical Institute



Medical Institute @MedInstitute · Dec 7, 2018

This unleashing of toxic sexuality on humanity is damaging those who view it and is addictive to those who continue to use it."
- Your Brain on Porn

Check out our Pornography article by Dr. Donald Hilton
medinstitute.org/articles/porno...

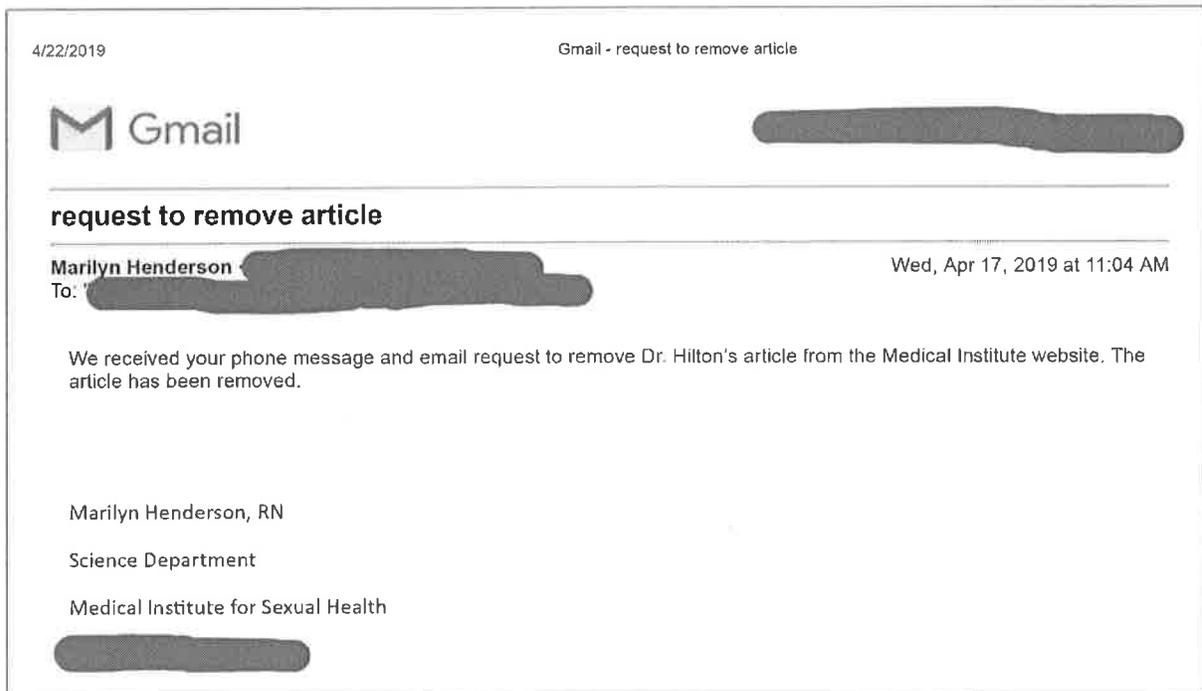





The paper has been posted at least 50 times on the Internet



The Medical Institute did not dispute the sexual harassment and removed Hilton's non-reviewed paper from their website, where it had been publicly available since 2018



Hilton and Stalker Gary Wilson insisting to reporter Prause attended porn awards she did not attend

Chad Sokol [redacted]@spokesman.com> Fri, Feb 22, 12:02 PM ☆ ↶ ⋮
to me ▾

Hi Dr. Prause,

This is the story we published today. There's a lot more I would have liked to delve into, but I didn't have enough time or space in the paper.

<http://www.spokesman.com/stories/2019/feb/22/gonzaga-university-to-host-anti-porn-conference-on/>

I don't mean to belabor this question, but I'm still trying sort out some details in Gary Wilson's claim that you attended the AVN awards. If it's untrue, I would like to prove it to him and pointedly ask why he's peddled the false claim.

This is the photo that he and Donald Hilton are citing. It was posted to Twitter in June 2016.

<https://twitter.com/iafdcom/status/745823086818136064>

When we spoke yesterday evening, you said this photo came from a screening for "After Porn Ends 2," in which you appeared as an expert. However, every source I can find shows the film premiered in March 2017.

<https://www.xbiz.com/news/218228/after-porn-ends-2-screening-draws-top-legends>

I also see that the AVN awards take place in January each year, so none of this is making much sense to me. Can you offer any clarification?

I realize all this controversy and mud-slinging is a distraction from the actual science, but I also think it's important to discredit baseless conspiracy theories.

Thanks again,

Chad



7/25/2019

Gmail - I hope this clears things up!



Nicole Prause <[redacted]>

I hope this clears things up!

Jeanne Silver <[redacted]>
To: Nicole.Prause@gmail.com

Wed, Jul 3, 2019 at 9:57 AM

To whom it may concern:

In 2015 I was inducted in to the Adult Industry Hall of Fame, which is not a part of the Adult Video Network (AVN). I was inducted along with others, including Melissa Hill. At that induction, which is publicly available on YouTube, I told my story of working in the adult industry. I did attend the AVN /AEE (Adult Entertainment Expo) show but not the awards in 2015. I was invited to attend in 2016 and did go as a speaker on sex and disability.

I have never met Dr. Prause. I have no reason to think Dr. Prause was ever at AVN or in the adult industry herself. Any reference to my being at the AVN in 2015 likely was referring to my hall of fame induction, which actually occurred the weekend before AVN. Someone who was not at AVN likely would not have known which event was which.

Sincerely,
Jeanne Silver
[redacted]



STATE OF CALIFORNIA §
 §
COUNTY OF LOS ANGELES §

DECLARATION OF DAVID LEY, PH.D.

1. My name is David Ley, Ph.D. I am a licensed psychologist in New Mexico. I also am a researcher, public speaker, and popular writer on human sexuality, including the effects of pornography.
2. I met Dr. Nicole Prause when she was a Research Scientist at Mind Research Network and University of New Mexico in Albuquerque, New Mexico around 2010. She was conducting neuroscience research relevant for my writing. We eventually collaborated on a widely-cited, peer-reviewed article that was critical of the claims of the sex addiction industry.

Ley, D., Prause, N., & Finn, P. (2014). The emperor has no clothes: A review of the ‘pornography addiction’ model. *Current sexual health reports*, 6(2), 94-105.

3. I have seen that Hilton claims our paper recommended that children view porn. It does not. To support his lie he claims we stated “One possibility is that those with higher sexual sensation seeking use VSS at younger ages and broaden the content of their VSS when sexual partners are not available to them to engage in actual sexual risk behaviors.” Hilton altered the statement. The sentence actually ends “[154].” which is the citation:

Seigfried-Spellar KC, Rogers MK. Does deviant pornography use follow a Guttman-like progression? *Comput Hum Behav.* 2013;29(5):1997–2003.
doi:10.1016/j.chb.2013.04.018.

In other words, that sentence was never a recommendation for youth to view pornography, it was a statement of fact made by another author whom we were quoting. Hilton obviously knows he deleted the citation with the intention to lie, yet has presented this nationally and internationally as alleged evidence that we told children to view pornography. I regularly describe in media interviews and clinical trainings that youth viewing, creating, or sharing pornography is illegal and should never be encouraged. I also describe that youth with higher sensation-seeking tendencies access pornography at a younger age, as an expression of their innate desires, and that later sexual sensation-seeking behaviors reflect these tendencies, not the effects of pornography exposure.

4. Dr. Prause has been a target for extreme misogyny as a part of her research in pornography, including from individuals listed in this lawsuit. I personally received the statement from Dr. John Adler, was on the listserv where Dr. Geoff Goodman made his sexist comments, and have seen Alexander Rhodes’ NoFap community obsessively call Dr. Prause misogynist names, joking about raping and stalking her. There is no doubt that their



statements were sexist and some also were sexual. Dr. Prause has been the multi-year target of extreme sexism by the anti-pornography community. While I have also received threats and defamatory criticism, it has never approached the level, volume or intensity of the attacks leveled upon Dr. Prause. I believe this is because she is a leading neuroscientist in both the human sexuality and addictions field, including a licensed clinician, giving her obvious authority to express her expertise in these areas where few women work.

5. Dr. Prause has shared her university and legal reports with me about these individuals. She always accurately described exactly what happened. I have never seen any response from these review bodies describing her statements as inaccurate.
6. I have received a series of death threats related to my writing about pornography. Some refer to Dr. Prause, including threats to rape her, and referring to her as “bitch” and similar. I have spoken with the Los Angeles Police Department (LAPD) regarding these threats and they continue to investigate these threats. I am aware of at least four other individuals studying pornography who have received such threats.
7. I am aware that Gary Wilson has been posting malicious, false, sexist, and extensive harassment of Dr. Prause since 2013 across hundreds, possibly thousands, of websites. I have seen her name over 10,000 times on just one of Gary Wilson’s websites, www.yourbrainonporn.com. My own postings on Psychology Today allowed me to see the IP address of those who posted comments. These revealed an IP address that I believe to have been Gary Wilson’s, when the poster claimed not to be Gary Wilson making harassing and false statements about Dr. Prause. The IP address was cross-validated with other posts where Gary Wilson identified himself, geo-located to his home in Ashland, Oregon, and submitted to the FBI.
8. Dr. Prause has consulted me several times about staying safe from Gary Wilson. She has told me many times over the years that she relocated her home and office multiple times due solely to fear from Gary Wilson. Her fear is justified. Wilson is extremely obsessed and threatening with Dr. Prause. I am very concerned for her safety from Gary Wilson, and I expressed this to the Los Angeles Police Department.
9. Wilson has extensively, literally “advertised” the FBI and police reports that Dr. Prause has been forced to file due to his stalking and threats. Wilson has bragged on video that Dr. Prause “will never stop me” with respect to her reports. I have seen the FBI and police reports she filed. Anyone aware of Wilson would be aware that he has a history of multiple FBI and police reports filed by Dr. Prause.
10. Gary Wilson has appeared on multiple media outlets involving individuals and themes associated with white nationalist rhetoric, including Gnostic Media for the DailyStormer and Stefan Molyneux. He advertised his appearances on these shows. Anyone aware of Wilson would be aware that he has been associated with these endeavors.

11. Given that all our death threats contained antisemitic language and Gary Wilson directly supports white supremacists, we believe that the death threats are likely from Gary Wilson or persons associated with him. The Los Angeles Police Department is investigating this exact possibility.
12. All of the individuals who have received death threats appear extensively on Gary Wilson's website www.yourbrainonporn.com. These posts are replicated on his wife, Marnia Robinson's website, www.pornstudycritiques.com.
13. Gary Wilson has both posted online and told media outlets extensive false credentials, including that he was a "professor", graduated from Southern Oregon University, and was an independent instructor for a college course.
14. Gary Wilson gives medical and clinical advice, including recommendations to change medications, to individuals online despite having no qualifications nor licensure to do so. The Mental Health Regulatory Agency in Oregon is aware. They have requested that anyone residing in Oregon who has received such advice from Gary Wilson to contact them immediately.
15. I reviewed the films, writing, and statements of Donald Hilton regarding Dr. Prause. Prause has accurately described these as sexual, misogynist, and threatening. Further, despite knowing that Gary Wilson works with white supremacists, has multiple FBI and police reports, has no credentials, and obsessively tracks Dr. Prause in violation of multiple no-contact instructions, Hilton promotes and works directly with Wilson. Hilton clearly intends to harass, including sexually harass, Dr. Prause. Dr. Prause was right to report her concern that Hilton would promote Gary Wilson's stalking of her, even as we have received death threats.
16. I have received numerous legal threats from the International Institute for Trauma and Addiction Professionals (IITAP) by Stefanie Carnes for being critical of their training, assessments, and therapy. I am aware of at least four other PhDs who have received legal threats from IITAP that they would sue for defamation and/or libel solely for expressing their professional critiques of IITAP training, assessments, and therapy. I am not aware of any professionals whom IITAP has actually sued. I believe I received these legal threats from IITAP solely to silence my free speech. They have also threatened one of my employers, Psychology Today, with the same threats if Psychology Today did not remove or censor my writing. I believe that Dr. Carnes is participating in this lawsuit purely to silence critique about her IITAP.
17. Hilton's retaliation against Dr. Prause for accurately reporting him is consistent with a common response of individuals who are confronted about their inappropriate behaviors.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on August 20, 2019.



David Ley, Ph.D.



GROUP BIOMEDICAL SCIENCES
DEPARTMENT OF NEUROSCIENCES
INSTITUTE FOR FAMILY AND SEXUALITY STUDIES
KAPUCIJNENVOER 7, BLOK G
3000 LEUVEN, BELGIUM



August 27, 2019

To whom it may concern,

With this letter I wish to acknowledge that Nicole Prause worked as a paid research associate on two externally funded Kinsey Institute research projects and acted as lab manager of the Kinsey Institute's sexual psychophysiology lab during the years 1999 and 2000. The projects Nicole worked on as a paid hourly employee included the use of sexual films to induce sexual arousal. Nicole assisted with recruitment, data collection, and data processing and analysis.

Sincerely,

Erick Janssen, Ph.D.

Professor

Department of Neurosciences
University of Leuven
Belgium

Senior Research Fellow

The Kinsey Institute
Indiana University
Bloomington, IN, USA

PROF. DR. ERICK JANSSEN
TEL. + 32 16 377 995
erick.janssen@kuleuven.be



STATE OF CALIFORNIA §
 §
COUNTY OF LOS ANGELES §

DECLARATION OF SHELLEY BARTOLINI

1. My name is Shelley Bartolini. I am an adult film performer. I have been in the industry over 10 years. I live and work in the Los Angeles area.
2. As a part of my job as a performer, I am invited to attend adult entertainment events, including the annual Adult Video News (AVN) awards. I have attended the AVN awards many times over the years, including in 2015.
3. I met Nicole Prause, PhD through a mutual friend around 2014.
4. Dr. Prause was not at the AVN awards in 2015, any other year that I attended, nor any other year of which I am aware. The AVN awards are consistently televised and heavily photographed. It would be difficult, maybe impossible, to attend without being noticed and photographed.
5. I have no reason to believe that Dr. Prause has any professional or personal involvement in the adult entertainment industry.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on August 17, 2019.



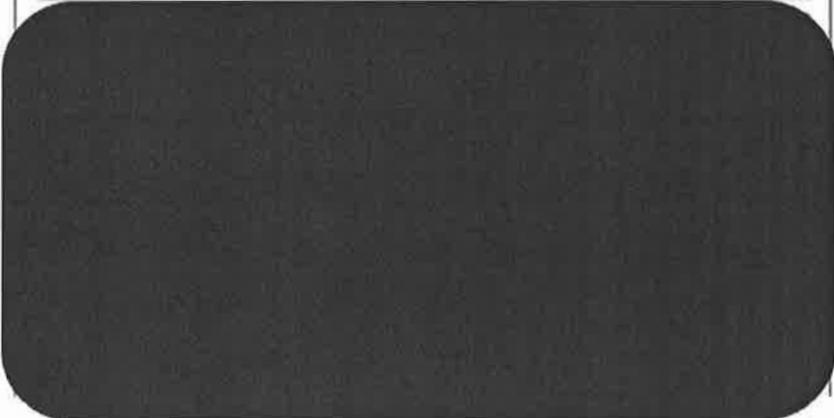
Shelley Bartolini



Prause in California all weekend of AVN 2019 working

Cash withdrawals from California ATM Saturday and Sunday. 7-Eleven in Burbank Sunday. No purchases in Las Vegas.

Transactions		
Visit www.capitalone.com to see detailed transactions.		
NICOLE PRAUSE # [REDACTED]: Payments, Credits and Adjustments		
Date	Description	Amount
NICOLE PRAUSE # [REDACTED] Transactions		
Date	Description	Amount
Jan 25	[REDACTED]	\$10.46
Jan 26	*BRENTWOOD DISTRICTLOS ANGELESCA	\$303.00
Jan 27	[REDACTED]	\$8.76
Jan 27	*BRENTWOOD DISTRICTLOS ANGELESCA	\$203.00
Jan 27	7-ELEVEN 39362BURBANKCA	\$5.01



Login to Prause Box account from Los Angeles Saturday.



Box login from "Windows Chrome"



BOX <noreply@box.com>
to Nicole.Prause ▾

Jan 26, 2019, 11:13 AM ☆ ↶ ⋮



Box login from "Windows Chrome"

This application has now been added to your login activity list. If this was you, you can disregard this email.

- **Application:** Windows Chrome
- **Time:** Saturday, January 26, 2019 at 11:13:35 AM PST
- **Location:** Los Angeles, CA, USA (Approximated from IP address [REDACTED])

You can manage your login activity list from the Security tab and your notifications from the Notifications tab of your Account Settings.

If you did not add this application, click the button below to remove it from your login activity list.

[Remove Application](#)

Car rental from Santa Monica Saturday, returned Sunday. Only 66 miles were driven to take lab equipment to Burbank testing site. Las Vegas is 550 miles round trip from Los Angeles.



Rental Agreement #: 4PCF41
 Bill Ref #: 5500-3164-2649
 Invoice Date: 01/28/2019
 Account #:

BILL TO

NICOLE PRAUSE

RENTAL INFORMATION

Date/Time Out
01/27/2019 10:47 AM

Date/Time In
01/28/2019 09:00 AM

Renter
PRAUSE, NICOLE

RENTAL VEHICLES

Color	License	Model	Unit	Miles/Kms Out In
SILVER	8ANL232	ELAN	7Q8B5N	25,123 25,189

VIN: 5NPD84LF5JH267835

CLAIM INFORMATION

Claim# / PO# / RO# **Insured**
Date of Loss **Type of Loss** **Type of Vehicle**

BILLING DETAIL

Description
TIME & DISTANCE

VEHICLE LICENSE RECOVERY FEE
SALES TAX

Total Charges (USD)

PAYMENTS

Payment

Total Payments (USD)

Amount Due (USD)

Individual line item charges such as rental rates (e.g. sales taxes and fees or surcharges), are rounded up or down to a whole cent to ensure a total and/or to avoid fractional cents.



Patient schedule that weekend, packed Sunday schedule after equipment testing Saturday.

The screenshot shows the SimplePractice software interface. At the top, there is a search bar for clients and a '+ Create' button. The main area is a calendar for January 2019, with columns for Sun, Mon, Tue, Wed, Thu, Fri, and Sat. The calendar shows several appointment slots, some of which are redacted with black boxes. A sidebar on the left contains navigation options: Calendar, Clients, Billing, Insights, Activity, Reminders (with a notification badge), and Privacy. At the bottom left, there is a 'Get Help' button.

STATE OF CALIFORNIA §
 §
COUNTY OF LOS ANGELES §

DECLARATION OF DAVID LEY, PH.D.

1. My name is David Ley, Ph.D. I am a licensed psychologist in New Mexico. I also am a researcher, public speaker, and popular writer on human sexuality, including the effects of pornography.
2. I met Dr. Nicole Prause when she was a Research Scientist at Mind Research Network and University of New Mexico in Albuquerque, New Mexico around 2010. She was conducting neuroscience research relevant for my writing. We eventually collaborated on a widely-cited, peer-reviewed article that was critical of the claims of the sex addiction industry.

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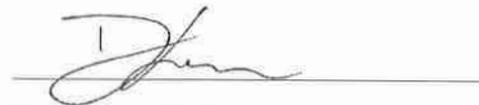
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11. Given that all our death threats contained antisemitic language and Gary Wilson directly supports white supremacists, we believe that the death threats are likely from Gary Wilson or persons associated with him. The Los Angeles Police Department is investigating this exact possibility.
12. All of the individuals who have received death threats appear extensively on Gary Wilson's website www.yourbrainonporn.com. These posts are replicated on his wife, Marnia Robinson's website, www.pornstudycritiques.com.
13. Gary Wilson has both posted online and told media outlets extensive false credentials, including that he was a "professor", graduated from Southern Oregon University, and was an independent instructor for a college course.
14. Gary Wilson gives medical and clinical advice, including recommendations to change medications, to individuals online despite having no qualifications nor licensure to do so. The Mental Health Regulatory Agency in Oregon is aware. They have requested that anyone residing in Oregon who has received such advice from Gary Wilson to contact them immediately.
15. I reviewed the films, writing, and statements of Donald Hilton regarding Dr. Prause. Prause has accurately described these as sexual, misogynist, and threatening. Further, despite knowing that Gary Wilson works with white supremacists, has multiple FBI and police reports, has no credentials, and obsessively tracks Dr. Prause in violation of multiple no-contact instructions, Hilton promotes and works directly with Wilson. Hilton clearly intends to harass, including sexually harass, Dr. Prause. Dr. Prause was right to report her concern that Hilton would promote Gary Wilson's stalking of her, even as we have received death threats.
16. I have received numerous legal threats from the International Institute for Trauma and Addiction Professionals (IITAP) by Stefanie Carnes for being critical of their training, assessments, and therapy. I am aware of at least four other PhDs who have received legal threats from IITAP that they would sue for defamation and/or libel solely for expressing their professional critiques of IITAP training, assessments, and therapy. I am not aware of any professionals whom IITAP has actually sued. I believe I received these legal threats from IITAP solely to silence my free speech. They have also threatened one of my employers, Psychology Today, with the same threats if Psychology Today did not remove or censor my writing. I believe that Dr. Carnes is participating in this lawsuit purely to silence critique about her IITAP.
17. Hilton's retaliation against Dr. Prause for accurately reporting him is consistent with a common response of individuals who are confronted about their inappropriate behaviors.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on August 20, 2019.

A handwritten signature in black ink, appearing to read "D. Ley", is written over a horizontal line.

David Ley, Ph.D.

COMMENTARY



Porn Is for Masturbation

Nicole Prause¹ Received: 3 January 2019 / Accepted: 7 January 2019
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In their Target Article, Leonhardt, Spencer, Butler, and Theobald (2018) advance a structural model to explain seemingly disparate effects of visual sexual stimuli (VSS). They argue that the nature of VSS effects depends on relationship length and VSS content. Specifically, short-term partners are said to accrue benefits from VSS, such as increasing sexual breadth and increasing sexual desire/arousal in the moment, while long-term partners are said to suffer negative effects from VSS due to decreasing intimacy and poorer communication. Further, Leonhardt et al. advance that sexual content (categorized as suggestive, explicit, or paraphilic) is an important mediator of VSS effects. Specifically, they argue that explicit and paraphilic VSS are more likely to influence sexual behaviors than suggestive VSS. Their model is primarily sociological, focused on structures of the family. Individual-level studies, including experiments important for establishing cause, are not strongly represented by this model. However, the model paths are well specified. This clarity creates many falsifiable, risky predictions amenable to testing, which are important features of a strong model. The primary hypothesis advanced is that VSS are “congruent with short-term sexual quality and incongruent with long-term sexual quality.” I focus on the empirical problems with the model that arise from ignoring the primary function of VSS as a masturbation aid.

Masturbation often is accompanied by VSS viewing, especially among men (Carvalho, Træen, & Stulhofer, 2015; Cooper & Klein, 2017; Kraus, Martino, & Potenza, 2016; Træen & Daneback, 2013). Inversely, almost all instances of VSS viewing occur with masturbation in men and women, both younger and older (Baćak & Štulhofer, 2011; Carvalho et al., 2015). Consistently, the most endorsed item of a 14-item VSS use questionnaire is “I use it to help me masturbate for physical release” (Brown, Durtschi, Carroll, & Willoughby, 2017). Occasions of viewing VSS *without* masturbating were reported to occur,

on average, less than once per year (Sun, Bridges, Johnson, & Ezzell, 2016). Many scientists have suggested that VSS exist primarily for masturbation (for review, see Prause, 2017). Leonhardt et al. (2018) claim that no variables can “fully dissipate the objective influence of viewing sexual media on sexual quality.” However, apparent relationships between VSS and relationship happiness disappeared when controlling for masturbation (Perry, 2019). Further, distress about VSS does not predict neural responses to sexual images, but a person’s level of sexual desire does (Prause, Steele, Staley, Sabatinelli, & Hajcak, 2015b; Prause et al., 2016). Given the very high covariance between VSS viewing and masturbation, any study that does not account for masturbation (or, relatedly, sex drive) cannot be understood as a study of “pornography” effects.

Consider the canonical heterosexual, monogamy-intentioned couple’s case. When a dyad initiates a sexual relationship, spontaneous desire is high, especially in women (Basson, 2000; for response, see Both & Everaerd, 2002). Importantly, this elevated sexual desire in women during dating is associated with greater satisfaction in both members of the dyad, regardless of the actual sexual frequency (Willoughby & Vitas, 2012). Over time, both dyad members tend to report lower sexual desire (Impett, Strachman, Finkel, & Gable, 2008). Following pregnancy, women’s sexual desire may be especially negatively impacted by fatigue (Hipp, Low, & van Anders, 2012). A loss of sexual desire is not associated with becoming negative about sexuality in general; rather, the lower sexual desire partner typically remains sex positive, describing “I want to want” (Brotto, 2013). The sexual desire discrepancy that emerges is associated with less relationship satisfaction, stability, and positive communication, and more couple conflict in married couples (Santtila et al., 2008; Willoughby, Farero, & Busby, 2014); Similarly, sex film viewing discrepancy is associated with less relationship satisfaction, stability, positive communication, and more relational aggression in romantic relationships (Willoughby, Carroll, Busby, & Brown, 2016). These parallel findings demonstrate an important, uncontrolled third variable.

Masturbation is a common strategy to cope with sexual desire discrepancies (Herbenick, Mullinax, & Mark, 2014; Regnerus, Price, & Gordon, 2017). Women who viewed more

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VSS in long-term relationships reported higher relationship satisfaction (Poulsen, Busby, & Galovan, 2013), which may reflect women using VSS to decrease the sexual desire discrepancy in their relationships. Sexual desire discrepancy has been the most common problem presented in sex therapy clinics (Mark, 2012; Rosen, 2000). Therefore, if a couple with discrepant desire presented for treatment, it would be inaccurate to describe VSS as having caused the relationship dissatisfaction. Yet, the model presented by Leonhardt et al. (2018) makes this attribution error. Specifically, they attribute negative effects in long-term relationships to VSS rather than this well-replicated sexual desire discrepancy. Specifically, they claim “We do not see evidence that congruence in use... will fully dissipate the objective influence of viewing sexual media on sexual quality.” This is because VSS use was never the operant: Masturbation is.

Youth Masturbate for Pleasure

Leonhardt et al. (2018) suggest that youth may be especially susceptible to the effects of VSS viewed without the benefit of contradictory information, especially from families, who typically strongly influence the effects of non-sexual visual media. Certainly, children are still developing their cognitive abilities. Persons with lower cognitive ability are less able to readjust their attitudes after being presented with conflicting information (De keersmaecker & Roets, 2017), so VSS viewing in youth could strongly impact sexual values. Curiously, Leonhardt et al. presumed the effects of VSS on children must be negative and require familial mitigation (“[family] can mitigate the influence of sexual media,” “Healthy exploration within primary source relationships”). Realistically, parental reactions to childhood masturbation, with or without VSS, are often shaming and potentially harmful (Gagnon, 1985).

Although youth appear more likely to view VSS for education than adults, youth also overwhelmingly report viewing VSS for the purpose of masturbating (Attwood, Smith, & Barker, 2018). Youth may report this activity indirectly, such as viewing VSS “to relax and have some fun when I’m watching” (Ramlagun, 2012, p. 32). Childhood masturbation has been described as “almost universal” (Leung & Robson, 1993). Yet, asking youth about their own sexual desires often is off-limits to scientists under penalty of public sanction (Mirkin, 2000). Even the American Psychological Association, Task Force on the Sexualization of Girls (2007) insisted “girls are sexualizing themselves through their behavior” but cannot possibly be “freely choosing these behaviors.” Similarly, Leonhardt et al. (2018) write as though youth are passive, non-sexual agents, describing that they “are exposed to a sexual script” and “children receive their formative exposure.” This ignores that youth can be active sexual agents, experience sexual motivation for pleasure, and masturbate.

Leonhardt et al. (2018) present the “age of exposure” as a risk factor (in “Formativeness” section) for negative outcomes. Yet, earlier viewing of VSS has a number of positive associations. Youth who view more VSS tend to feel better about their genital appearance (Kvalem, Træen, Lewin, & Štulhofer, 2014). Experimental data in women suggest that this may be due to seeing real vulvas that share a similar appearance to one’s own vulva, which provides reassurance and improves genital self-image (Laan, Martoredjo, Hesselink, Snijders, & van Lunsen, 2016). In a longitudinal study, adolescent women who view VSS earlier report higher self-esteem later (Kohut & Štulhofer, 2018). College students who viewed VSS more identified genital structures more accurately than those who watched VSS less (Hesse & Pedersen, 2017). The age of sexual debut was not predicted by earlier VSS viewing in a longitudinal study of adolescents (Matković, Cohen, & Štulhofer, 2018).

Sexual orientation minority youth also may benefit from viewing representations of their sexuality. LGBT youth already report using online media to create, foster, and advocate for community that promotes resilience (Craig, McInroy, McCreedy, & Alaggia, 2015). These youth are more likely to use online sex resources not only for in-person sexual connections (Macapagal et al., 2018), but also for dating relationships (Korchmaros, Ybarra, & Mitchell, 2015), than heterosexually identified youth. Gay representation in VSS may empower youth to discover, communicate, and realize personal sexual desires (Döring, 2000). LGBT youth also search for VSS content purposefully to explore and affirm their own sexual orientation (McCormack & Wignall, 2016), which may reduce years of anxiety before they would choose to behave sexually with another person or come out to family. If these formative experiences increase the likelihood of these scripts applying in adulthood, VSS viewing in LGBT youth appears likely to reduce sexual shame that can lead to sexual difficulties as adults.

VSS viewing by youth is illegal in the USA and most of the world, so it would never be appropriate to encourage youth to view VSS. Since VSS can never be shown to youth for experiments, evidence of harms (or benefits) due to childhood viewing of VSS can never be causally established. While conversations concerning sexual desire in youth can be uncomfortable and co-opted by nefarious actors, scientists should not shy from the literature that recognizes developing sexual motivation in youth. Youth appear to actively seek VSS primarily for masturbation. Further, sexual minority youth might not otherwise receive LGBT-positive sex education and may not have an informed, accepting family. Identifying methods to support the benefits of VSS viewing by youth who found VSS, while mitigating the risks (Livingstone & Helsper, 2009), appears more consistent with the arguments to contextualize VSS experience advanced by Leonhardt et al. (2018).

VSS Typologies

Leonhardt et al. (2018) lament that VSS consumption is not well characterized in most studies. Specifically, they highlight a lack of accounting for VSS content and propose the distinctions “suggestive,” “explicit,” and “paraphilic.” These content distinctions are useful to test hypotheses regarding specific sexual scripts (e.g., paraphilias) or characterize the breadth of sexual behaviors. Data would be needed to support that these are not better characterized along an intensity (or explicitness) dimension already used in research.

The proposed paraphilic category creates a problem in interpretation for some hypothesis testing. The paraphilic category proposed will contain a mix of higher and lower explicitness VSS. VSS explicitness already has been used in studies, for example, to predict sexual partners (Prause, Steele, Staley, & Sabatinelli, 2015a). In earlier studies, “suggestive” versus “explicit” distinction has been called “romantic” (e.g., “cuddle,” “tender,” “embrace”) versus “explicit” (Geer & Bellard, 1996). Given that VSS have historically been characterized by intensity/explicitness alone, the onus to support the proposed new classification would be to demonstrate improvements in predictive utility. Since VSS are primarily a sign for masturbation and sex drive, characteristics of masturbation during VSS may be more predictive of future behaviors than characteristics of the VSS. For example, the typical number of orgasms for the VSS viewing time, the time spent manually stimulating the genitalia, and so on would help characterize sexual satiety issues surrounding VSS viewing.

Some of the hypothesized effects of VSS lacked a clear mechanism. Leonhardt et al. (2018) describe that VSS “do not portray the importance of non-contingently meeting a partner’s sexual needs and therefore do not elicit the sexual script of sexual communal strength.” Both men and women are portrayed as reaching orgasm less consistently in VSS than in studies of the general population (Séguin, Rodrigue, & Lavigne, 2018). Yet, men still value their own sexual worth by the occurrence of their female partner’s orgasm (Chadwick & van Anders, 2017; Salisbury & Fisher, 2013). If men view female anorgasmia as a male failure, can this support VSS promoting scripts that ignore partner’s sexual needs? Further, “explicit” VSS are lamented as “90%...portray sex as being primarily for self-pleasure.” Are people masturbating supposed to be motivated to provide pleasure for the performer with whom they have no relationship? Perhaps masturbation with VSS is best considered a leisure activity. Similarly, behavioral couple therapy includes “love days,” during which one dyad member receives treats from the other intermittently throughout the day without the expectation of return. This was thought to increase the ratio of positive to negative interactions and increase relationship satisfaction. Proposing mechanisms of some VSS content effects, which account for masturbation, would help clarify these hypotheses.

Women’s Uncomfortable Fantasies

The proposed negative effects of VSS content could be informed by data on women’s sexual response. Leonhardt et al. (2018) describe that explicit VSS “tends to separate individuals’ body parts and sexual function from their identity, emotions, and relationships (particularly for women)” and that leads to negative effects in long-term relationships. However, women in marriages that they perceived to be very committed reported higher marital satisfaction when their husband expressed more interest in them as a sexual object (Meltzer, McNulty, & Maner, 2015). On the other hand, a sample of largely unmarried women struggled with negative effects from self-objectification (Ramsey, Marotta, & Hoyt, 2016). Self-objectification was more distressing for women who already struggled with lower self-esteem (Breines, Crocker, & Garcia, 2008). Objectification appears to benefit marriages, but to not affect (or harm) shorter-term relationships. This appears to falsify a core prediction of the proposed model. However, VSS viewing is not consistently related to the objectification of women (e.g., McKee, 2007).

Relatedly, paraphilic stimuli also are described as including “coercive” and “domination” content. Women who were not recruited for having preferences for this type of stimulus respond with genital arousal to films of women being forced to walk, kiss, and be hit by a man showing clear signs of sexual arousal and intent to assault the actress (Laan, Everaerd, & Evers, 1995; Peterson & Janssen, 2007). Of course, genital arousal is not an indication that a woman desires actual sexual assault (Chivers & Bailey, 2005), but 62% of women in one convenience sample reported having pleasurable rape fantasies (Bivona & Critelli, 2009). A substantial minority (9–17%) of women report that rape is a favorite sexual fantasy (Critelli & Bivona, 2008). With respect to “domination,” women appear more likely than men to discover their own BDSM interests through external influences, like exploring their own sexual arousal to BDSM using VSS during masturbation (Yost & Hunter, 2012). Leonhardt et al.’s (2018) assertions that “Scripts of dominance and coercion...suggest a particular lack of regard for a sexual partner’s desires” and “the inclusion of coercion and dominance...suggest a particular lack of responsive communication within the dyad” appear inconsistent with most women’s observed and reported sexual desires.

VSS Do Not Impair Erectile Function

Leonhardt et al. (2018) only mention of masturbation is that “Individuals may condition themselves to the sexual media script.” Neuroscience is inconsistent with the possibility that VSS mediate the relationship between masturbation and partnered sex. Sex films themselves are secondary reinforcements,

providing only a signal for primary rewards. Primary and secondary rewards have distinct representations in the brain (Sescousse, Caldú, Segura, & Dreher, 2013). For example, after being shown VSS in the laboratory where they could not masturbate, study participants were more likely to pursue sexual activity at home than on days when they were not shown VSS in the laboratory (Brown, Amoroso, & Ware, 1976). The proposed mechanism for developing ED with a partner from VSS use was to “reinforce arousal to a sexual stimulus without having a partner present.” When VSS viewing occurs alone, there is activation of secondary reinforcement. The primary reinforcement system is not fully engaged to be paired with VSS, as would be necessary for conditioning to occur. Put another way, if masturbation is required, then the effect cannot be attributed to VSS.

After citing contrary evidence, Leonhardt et al. (2018) inexplicably conclude in opposition to the data “Enough individuals have spoken out about the connection” that porn causes erectile dysfunction anyway. This triumph of bias over data is an example of Campbell and Kohut’s (2017) concern, where bias by scientists is overwhelmingly against identifying positive effects of VSS. To support their claim, Leonhardt et al. cite (1) a paper with no data, analysis, or editor that had been recommended for retraction by the Committee on Publication Ethics due to not consenting patients (Marcus, 2018), (2) a study that did not measure erectile dysfunction or any sexual dysfunction (Wright, Sun, Steffen, & Tokunaga, 2017), and (3) an fMRI study that required such sexual difficulties for inclusion in the study (Voon et al. 2014). Additionally, evidence from the only nationally representative (Dutch) study demonstrated better sexual function associated with more VSS viewing (De Graaf & Wijzen, 2017). Another proposed mechanism that tolerance will develop to VSS that generalizes to the partnered context is refuted by cross-sectional (Shor & Seida, 2019), longitudinal (Grubbs, Wilt, Exline, & Pargament, 2018), and experimental (Parada, Gérard, Larcher, Dagher, & Binik, 2016) studies.

The only aspect of VSS and sexual response for which cause has not yet been established is VSS viewing and sexual functioning with the partner actually present in the laboratory. Leonhardt et al. (2018) did acknowledge this as important, as they were not able to “fully understand the extent that content depicted in sexual media might influence arousal and intimacy in a sexual relationship without accounting for couple.” We brought 250 people (125 couples) into our laboratory to test the relationship of VSS and intimate responses with a partner, and these data are under review (Prause & Siegle, 2019).

Long-Term Relationships Started as Short-Term Relationships

Shorter-term partners are described as pursued for different motivations than longer-term partners (“Those engaging in short-term sexual experiences seem less likely to focus on

affectionate connection and concern for the partner’s” and “sense of permanence to the relationship”). Yet, recent data suggest casual sex partnerships commonly include affectionate behaviors (e.g., extended foreplay, eye gazing, cuddling, etc.) (Garcia, Gesselman, Massey, Seibold-Simpson, & Merriwether, 2018) consistent with intimacy and communal strength. Affectionate behaviors are not merely the domain of longer-term, committed partners. Also, new partners turn into longer-term partners (Bogle, 2008). Differentiating relationships by their current length seem likely to mischaracterize short-term relationships, where actor(s) may have had long-term goals. As described above, the role of masturbation varies by the relationship length: More masturbation is generally an indicator of relationship satisfaction earlier in relationships and relationship dissatisfaction later in relationships. Leonhardt et al. (2018) provide no data supporting attributing these differences to VSS.

Moving Forward

The primary hypothesis of the proposed model was a bit surprising given that a large, preregistered, replication attempt found no evidence for poorer relationship quality (attraction, love) in romantic partners attributable to VSS (Balzarini, Dobson, Chin, & Campbell, 2017). When asked directly, couples in relationships most commonly believe that their VSS viewing has no negative effects on their relationships and cite mostly positive effects (Kohut, Fisher, & Campbell, 2016). Further, others have failed to find direct effects of VSS on relationship satisfaction (except indirectly in men already low in intimacy; Veit, Štulhofer, & Hald, 2016). Many predictions of the proposed model appear already falsified by existing data. Such a model might be more useful to characterize the role of masturbation or sexual desire discrepancies.

Choosing to frame VSS as negative for longer relationships when data do not support such an attribution is likely to cause harm. These harms can occur for the (1) sexual development of children, (2) reducing healthy sexual behaviors, (3) promoting restrictive sex laws, and (4) causing adults to experience more shame about their normal sexual behaviors. When youth hear false claims of VSS harms, they report feeling more upset by the claimed harms of viewing VSS than by viewing the VSS itself (Spišák, 2015). Since masturbation appears to improve general health (e.g., Sinnott et al., 2018), pathologizing a common masturbation aid might reduce this health behavior. Also, a number of U.S. states are proposing regulations to restrict VSS access on the basis of claims of harm to relationships (Ley, 2018). Similar false claims of child harm by VSS “sexualization” already are influencing government policy (Smith & Attwood, 2011). Finally, errors attributing negative effects to VSS shame men for their masturbation, suggesting these men are misogynist or sexually broken. The largest gender difference in sexuality is often cited as male’s more frequent

masturbation relative to females (Oliver & Hyde, 1993). Porn is for masturbation (mostly). Models that espouse negative VSS effects without accounting for masturbation are providing a means to shame normal, common sexual behaviors.

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8/15/2019

Gmail - Re: Message from Mike South



Nicole Prause <nicole.prause@gmail.com>

Re: Message from Mike South

Mike South <mikesouth.web@gmail.com>
Reply-To: MikeSouth@mikesouth.com
To: "\"Nicole Prause\"" <nicole.prause@gmail.com>

Thu, Jul 25, 2019 at 2:18 PM

I can honestly say I have never heard of you and of course we would be willing to provide whatever you need to verify that you are not in anyway associated with our website

On Thu, Jul 25, 2019 at 3:44 PM Nicole Prause <wordpress@mikesouth.com> wrote:

Your Name: Nicole Prause

Your Email: nicole.prause@gmail.com

Message: Hi,

I don't believe we have ever met, but I have a strange situation. You reposted a quora post of mine a long time ago about the anti-porn YourBrainOnPorn website. That person, Gary Wilson, is now suing me, claiming that I am secretly in the pornography industry because I control your website. I really wish this was a joke.

Would you be willing to write an email just verifying that I have never posted anything on your website? Maybe that we've never met (I don't think we have?)? If you recall getting the content from my Quora account, including that might help clarify further. My email is nicole.prause@gmail.com

I am happy to fill you in on the details if you prefer. As ever, I am hoping the truth will be enough!

Nicole Prause

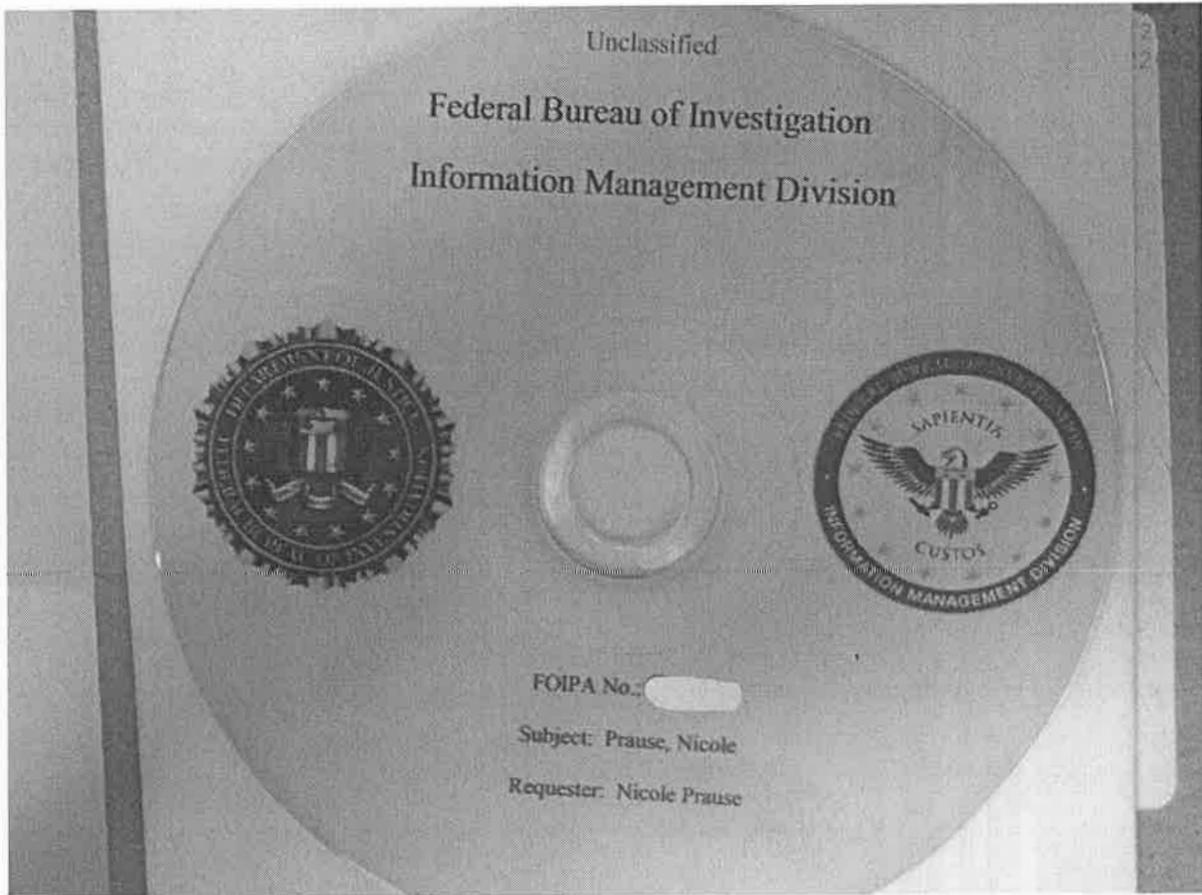
Time: July 25, 2019 at 4:44 pm
IP Address: 189.201.139.146
Contact Form URL: <http://mikesouth.com/contact/>

Sent by an unverified visitor to your site.



Freedom of Information/Privacy Act records against Stalkers Gary Wilson and Alexander Rhodes

FOIPA records directly from the FBI office with the reports of stalking, computer intrusion, and criminal threats against Gary Wilson and Alexander Rhodes.



The FBI website clearly states Stalker Gary Wilson and Alexander Rhodes would never have been given these records, which they lied do not exist.



Another living person:

<https://www.fbi.gov/services/information-management/foipa/requesting-fbi-records>

1/4

8/2/2019

Requesting FBI Records — FBI

- If your request is for information about another living person, that information is usually not disclosed unless you have obtained the person's written consent or unless public disclosure is authorized by law. Requests for information about another living person should be accompanied by evidence of the subject's consent. Please use U.S. Department of Justice Certification of Identity Form DOJ-361 (<https://www.fbi.gov/file-repository/u-s-department-of-justice-form-361-certification-of-identity.pdf/view>) and complete the section identified as: Authorization to Release Information to Another Person. You may submit an attachment listing additional information that may aid in locating responsive records. Please place your name and contact information on the attachment.

A deceased individual:

- If your request is for information concerning a deceased individual, you must provide proof of death. Acceptable

Lawrence A. Poltrock
Jennifer K. Poltrock
Wayne B. Giampietro

POLTROCK & GIAMPIETRO
Attorneys and Counselors
123 W. MADISON STREET, SUITE 1300
CHICAGO, IL 60602
(312) 236-0606; FAX (312) 236-9264

Kurtis R. Hale

May 9, 2019

Ms. Alisa C. Simmons
Fitch, Even, Tabin & Flannery LLP
120 S. La Salle Street, Suite 2100
Chicago, IL 60603

VIA EMAIL: Asimmons@fitcheven.com

Re: Gary Wilson; Your Brain On Porn;
Dr. Nicole Prause; Real Your Brain on Porn

Dear Ms. Simmons:

We are counsel to Dr. Nicole Prause, who has requested us to respond to your letter dated May 1, 2019 to her, wherein you claim that Dr. Prause has in some way infringed on the trademark rights of Gary Wilson and his claimed trademark "Your Brain on Porn." Those claims are wholly without basis. First, your claims are based on the assumption that Dr. Prause somehow controls or owns the website "realyourbrainonPorn.com." Although that web site refers to Dr. Prause, she has no ownership interest in that website.

Further, your letter mis-states the law regarding trademarks. While you claim your client owns the trademark "Your Brain on Porn," "YBOP," and similar names, he has not received a federal trademark registration for any of those alleged marks. In fact, he has requested such registration only recently.

Whether his application for federal registration of his claimed trademarks will be granted is problematic. Those claimed trademarks are clearly descriptive of the contents contained on the web site "Your Brain on Porn.com." Your claim that your client provides services through his web site is quite suspect, since there is nothing on that web site which offers anything other than information and directions to other sources. I see nothing on that web site which provides or offers any commercial services or products.

Further, that term is descriptive of the information provided on the web site. Since the term is descriptive, your client may make no assertion regarding our client's use of a similar mark unless he can prove that his mark has acquired a secondary meaning. I doubt most highly that he would ever be able to make such a showing.

Indeed, it appears that your client's term for which it claims a trademark is generic. Generic terms are entitled to no trademark protection whatsoever. The term "your brain on porn" is being used by numerous other individuals. It is indeed both descriptive and generic.



Ms. Alisa C. Simmons, May 9, 2019

Page 2

In order to prevail on your claim that Dr. Prause and her colleagues have in some way infringed upon your client's trademark, you will be required to prove likelihood of confusion between the trademarks being used by the parties. It will be impossible for Wilson to make that showing. Dr. Prause makes it extremely clear that her view of the issues regarding pornography is diametrically opposite to the material published by your client. Numerous cases have held that under these circumstances, there can be no finding of likelihood of confusion. You would have the burden of making such a showing. You cannot do so. Dr. Prause neither offers nor sells any goods or services which could conceivably be considered to be competitive with your client. You can never show any confusion as to either goods or services.

Most importantly, Dr. Prause has the right to espouse her views on the subject of the effect of pornography on individuals, which is protected by the First Amendment. In order to demonstrate her views are counter to the views of your client and demonstrate their falsity, she must be able to use the same terms to inform the public that she is speaking about the same subject. You cannot use any claimed trademark rights to interfere with Dr. Prause's First Amendment right to freely speak on this subject of public interest and importance. The cases which recognize this concept are legion.

Your demands that Dr. Prause cease exercising her constitutional rights to educate the public about the subject of the effects of pornography on individuals and to counter the information espoused by your client are rejected. I understand that you have made the same threats of litigation and demands regarding your client's alleged trademarks against others with whom Dr. Prause is affiliated. Those demands and threats are similarly unfounded. Those threats must cease immediately.

Finally, despite having been warned in 2015 by counsel for Dr. Prause, Mr. Wilson has continued his barrage of untrue defamatory attacks upon Dr. Prause. Apparently he has embarked upon a vendetta against Dr. Prause and others with whom she is associated. Dr. Prause's name alone appears on more than 4000 pages of Wilson's web site, and over 108,000 times with his link online. While a dispute regarding issues of public interest is one thing, making false and defamatory allegations against Dr. Prause is indefensible.

Among the false allegations Wilson has made against Dr. Prause are:

- she has engaged in "obsessive, unrelenting cyber-harassment" against Wilson
- she "tells a porn addict to visit a prostitute (a violation of APA ethics and California law)
- she is "unprofessional and unethical"
- she was fired, terminated and/or reprimanded by the University of California, L.A.
- she falsified or utilized "bogus" data in her studies
- she has been, or is currently, funded or receiving material support from pornography organizations
- she is, herself, involved in the porn industry

Ms. Alisa C. Simmons, May 9, 2019

Page 3

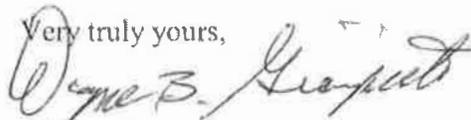
her research is funded by One Taste
she has made false claims regards filing criminal complaints against Wilson
to federal and local law enforcement

These statements made by your client are false, defamatory and actionable. He must remove them from his web site immediately, and refrain from posting any similar accusations in the future.

You and your client are hereby put on notice that should you make any attempt to bring any claim against Dr. Nicole Prause or her associates of any kind, whether for trademark violation or otherwise, we will demonstrate to the Court that Wilson's claim for trademark violation is frivolous and subject to sanctions under Rule 11, Federal Rules of Civil Procedure, for commencing false and unfounded litigation. Dr. Prause will also file a counterclaim for defamation, false light invasion of privacy and intentional interference with business relations, seeking actual and punitive damages.

I am available to discuss this matter further if you wish to do so.

Very truly yours,



Wayne B. Giampietro

WBG/afd
cc: N. Prause

Lawrence A. Poltrock
Jennifer K. Poltrock
Wayne B. Giampietro

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123 W. MADISON STREET, SUITE 1300
CHICAGO, IL 60602
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Kurtis R. Hale

June 13, 2019

Ms. Alisa C. Simmons
Fitch, Even, Tabin & Flannery LLP
120 S. La Salle Street, Suite 2100
Chicago, IL 60603

VIA EMAIL: Asimmons@fitcheven.com

Re: Gary Wilson; Your Brain On Porn;
Dr. Nicole Prause; Real Your Brain on Porn

Dear Ms. Simmons:

I have received your letter of June 11, responding to my communication of May 9.

I will not respond to your attempt to engage in discovery regarding Dr. Prause or her connection with "Real Your Brain on Porn.com." I explained her relationship to the website in my letter of May 9. She does not own that website. There is nothing more to say on that score.

Your client has absolutely no claim against either Dr. Prause or that website. As a matter of law, the phrase "your brain on porn" is descriptive. It has been used by dozens, if not hundreds of others, on the Internet and elsewhere to discuss the relationship between mental health and pornography. Indeed, the United States Court of Appeals for the Seventh Circuit has recently confirmed that such descriptive phrases are entitled to no trademark protection. *Uncommon, LLC v. Spigen, Inc.*, No. 18-1917, June 11, 2019.

Any attempt to bring action against Dr. Prause will be defended vigorously. At the conclusion of any such suit, Dr. Prause will obtain her costs and fees for defending against such a wholly frivolous claim. See, for example, *Nightingale Home Healthcare, Inc v. Anodyne Therapy, LLC*, 626 F 3d 958 (7th Cir 2010), which makes it clear that bringing claims which lack merit such as those asserted by Mr. Wilson will result in penalties against him.

In short, your client has no valid trademark which could have been infringed by Dr. Prause. Any further attempts by him to claim any such rights or to object to Dr. Prause's right to use a similar phrase will constitute pure harassment, which will subject him to further liability for such conduct and expose him to a judgment for Dr. Prause's attorney's fees in defending against his unfounded claims.

Ms. Alisa C. Simmons, June 13, 2019

Page 2

Your letter makes no response to our demonstration that Mr. Wilson has made numerous defamatory statements regarding Dr. Prause and others who do not share his views. Obviously, that is because his conduct is indefensible. You can be assured that if any suit is filed by Mr. Wilson against Dr. Prause, he will face a counterclaim for his numerous defamatory statements concerning her.

I will engage in no further correspondence concerning this matter, as there is nothing more to discuss. My letter of May 9, 2019 sets forth the consequences to Mr. Wilson should he continues with his tortious conduct.

Very truly yours,

A handwritten signature in cursive script that reads "Wayne B. Giampietro". The signature is written in black ink and is positioned to the right of the typed name.

Wayne B. Giampietro

WBG/afd
cc: N. Prause

Lawrence A. Poltrock
Jennifer K. Poltrock
Wayne B. Giampietro

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wgiampietro@giampietrolaw.com

Kurtis R. Hale

July 3, 2019

Ms. Alisa C. Simmons VIA EMAIL: Asimmons@fitcheven.com
Fitch, Even, Tabin & Flannery LLP
120 S. La Salle Street, Suite 2100
Chicago, IL 60603

Re: Gary Wilson; Your Brain On Porn;
Dr. Nicole Prause; Real Your Brain on Porn

Dear Ms. Simmons:

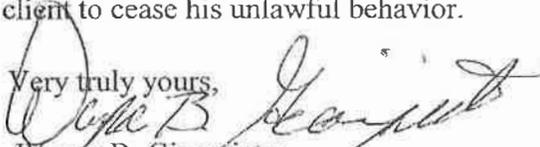
As you know, we are counsel to Dr. Nicole Prause. On May 9, 2019, I wrote to you informing you that your client, Gary Wilson has engaged in a constant barrage of untrue, defamatory attacks upon Dr. Prause. Although I demanded that you inform Mr. Wilson that he would be well advised to cease his false publications and allegations against Dr. Prause, his attacks continue unabated. Mr. Wilson made eight new posts attacking and defaming Dr. Prause yesterday alone.

Mr. Wilson does not appear to realize that every additional false statement and attack he makes against Dr. Prause will increase the damages which will be assessed against him. It is now obvious that not only is Dr. Prause entitled to recover actual damages which have been caused by these attacks, but that Mr. Wilson's malice will entitle her to obtain punitive damages in a large amount. The news media is replete with examples of the kind of punitive damages juries are awarding for the kind of conduct in which Mr. Wilson is engaging.

Dr. Prause has reached the end of her patience with Mr. Wilson. This is to inform you and your client, Gary Wilson, that unless he immediately ceases and desists from his defamatory campaign against Dr. Prause we will file suit against him for defamation, intentional interference with business relations, false light invasion of privacy, and undoubtedly several other causes of action.

The next communication Gary Wilson will receive from Dr. Prause will be a Summons and Complaint. Please counsel your client to cease his unlawful behavior.

Very truly yours,


Wayne B. Giampietro

WBG/afd
cc: N. Prause

~~BRYAN CAVE~~

BRYAN CAVE LLP 120 Broadway, Suite 300, Santa Monica, CA 90401-2386
T: 310 576 2100 F: 310 576 2200 bryancave.com

October 15, 2015

Jed P. White
Direct: 310/576-2114
Fax: 310/260-4114
jed.white@bryancave.com

VIA FEDERAL EXPRESS
AND EMAIL hotmail.com

Gary Wilson

Re: Notice to Cease and Desist Defamatory Statements

Dear Mr. Wilson:

This firm represents Dr. Nicole Prause in connection with the above-referenced matter. You have personally posted many false and misleading statements about our client. Examples of your false and misleading statements include:

1. Dr. Prause was fired, terminated, and/or reprimanded by the University of California, Los Angeles.
2. Dr. Prause falsified or utilized "bogus" data in her studies.
3. Dr. Prause has been, or is currently, funded by pornography organizations.
4. Dr. Prause has, herself, appeared in pornography.

The statements made by you regarding Dr. Prause are false, defamatory, and actionable under California law. Cal. Civ. Code §§ 44, 45, 45a. Your defamatory statements have caused injury to Dr. Prause's professional reputation. Accordingly, we demand that you immediately cease and desist your unlawful defamation of Dr. Prause, and immediately remove all defamatory material created by you or others on websites you own or control.

While Dr. Prause would prefer to resolve this matter without further legal action, we will file a lawsuit against you should you fail, despite this formal written notice, to comply timely and fully with the foregoing reasonable and lawful demands. If forced to file suit, we will seek all available

Gary Wilson
October 15, 2015
Page 2

remedies and seek all appropriate damages. While we certainly hope this is not necessary, we are prepared to pursue whatever avenues are necessary on behalf of our client to stop the continued defamatory statements made by you against Dr. Prause.

Finally, we remind you of Dr. Prause's no-contact request of April 12, 2013. All correspondence should be directed to our office. Dr. Prause should not be contacted using any method of communication, including email, Twitter, website links, mail, telephone, chat, or other means.

Very truly yours,



Jed P. White

JPW:cak

Annex

Gary Wilson incites white supremacist death threats against scientists by regularly sponsoring white supremacy on yourbrainonporn.com



8/4/2019

Gmail - Psychology Today: new comment on Is One Sexual Behavior Triggering Certain Groups?



Psychology Today: new comment on Is One Sexual Behavior Triggering Certain Groups?

Psychology Today <noreply@psychologytoday.com>
To: Nicole Prause <

Thu, Apr 18, 2019 at 11:56 PM

Hi Nicole Prause,

Hitler the great has commented on the Blog Post: "Is One Sexual Behavior Triggering Certain Groups?"

You Jews are fucking pathetic
You Jews are fucking pathetic. The masses are waking up right in front of you
and all you can do is write articles full of lies. The funny thing is your
money won't help you. Tell the truth, or perish like your ancestors!

You can view the comment at the following url
<https://www.psychologytoday.com/comment/1100137#comment-1100137>



Psychology Today: new comment on Is One Sexual Behavior Triggering Certain Groups?

Psychology Today <noreply@psychologytoday.com>
To: Nicole Prause <

Fri, Apr 19, 2019 at 12:04 AM

Hi Nicole Prause,

Hitler the great has commented on the Blog Post: "Is One Sexual Behavior Triggering Certain Groups?"

Jewish Subversion

Nicole you are a terrible human being and a filthy whore for money. You don't care how many people porn harms or how many kids grow up watching it and get addicted. No one is that stupid, we all know the truth. But you don't care what goys you hurt as long as you get some sick Jewish revenge on them. The day of the rope is coming for you and your group of cosmopolitans.

You can view the comment at the following url

<https://www.psychologytoday.com/comment/1100140#comment-1100140>

[Quoted text hidden]

8/4/2019

Gmail - Psychology Today: new comment on Is One Sexual Behavior Triggering Certain Groups?



Psychology Today: new comment on Is One Sexual Behavior Triggering Certain Groups?

Psychology Today <noreply@psychologytoday.com>
To: Nicole Prause <

Fri, Apr 19, 2019 at 12:27 AM

Hi Nicole Prause,

Hitler the great has commented on the Blog Post: "Is One Sexual Behavior Triggering Certain Groups?"

Jewish Subversion

I really can't believe you are an academic. Can you define hate speech for me sweetheart? Oh, what you can't because it is purposely used as a broad term to stop any speech that you hate. That's what it really is isn't is sweetly; hate speech is speech you hate. This is just an attempt to slowly take away the 1st amendment. And why is it that whenever anyone even mentions the jews its antisemitic? Is it because you and Dr. Jizzrag are jews? Is it because jews are disproportionately behind the creation of porn? You are not a scientist. You do not seek truth. You are a coward that wants to silence anyone who can prove you wrong. That porn money won't last forever sweetheart start planning because the day of the rope is coming.

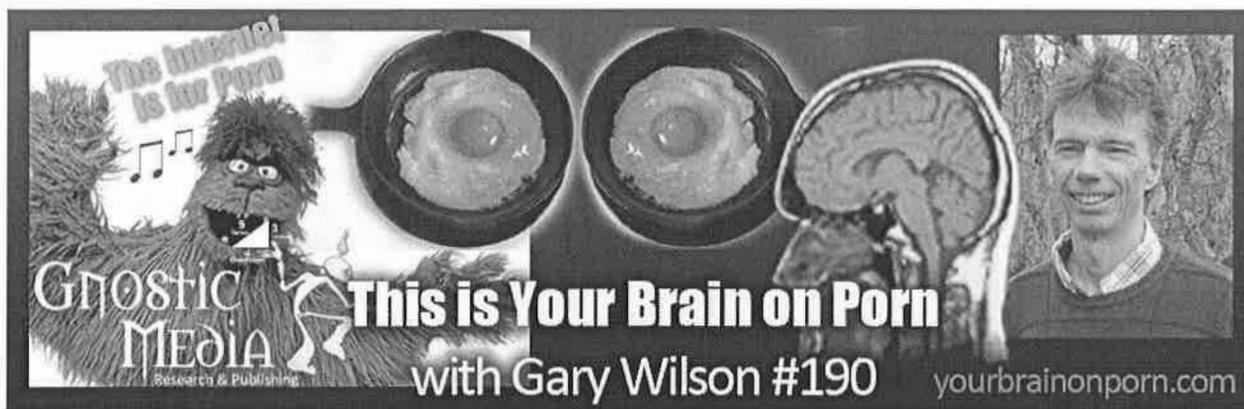
You can view the comment at the following url
<https://www.psychologytoday.com/comment/1100145#comment-1100145>
[Quoted text hidden]

GNOSTIC MEDIA PODCAST: AN INTERVIEW WITH GARY WILSON – “THIS IS YOUR BRAIN ON PORN”

Jan Irvin

Gnostic Media

February 3, 2014



Gary Wilson is the presenter of the popular TEDx talk “The Great Porn Experiment” and host of the website “Your Brain On Porn,” which was created for those seeking to understand and reverse compulsive porn use: <http://yourbrainonporn.com>. He taught anatomy and physiology for years and has long been interested in the neurochemistry of addiction, mating and bonding.



Download



ANDREW ANGLIN

Andrew Anglin is the founder of the neo-Nazi Daily Stormer website, which aptly takes its name from the gutter Nazi propaganda sheet known as *Der Stürmer*. True to that vintage, Anglin is infamous for the crudity of his language and his thinking, a contrast to his sophistication as a prolific Internet troll and serial harasser.



EXTREMIST INFO

Born: 1984

Ideology: Alt-Right Neo-Nazi

About Andrew Anglin

Andrew Anglin is the founder and editor of the neo-Nazi Daily Stormer website. Styled after popular image-heavy Internet forums like 4chan and 8chan, the Daily Stormer is dedicated to spreading anti-Semitism, neo-Nazism, and white nationalism, primarily through guttural hyperbole and epithet-laden stories about topics like alleged Jewish world control and black-on-white crime. As of April 2017, the site ranked 13,137th globally and 5,597th within the United States, according to Alexa.

In his own words

“Fear. *Now is the time for it* ... We want these people to feel unwanted. We want them to feel that everything around them is against them. And we want them to be afraid.”

—“Female Hajis Fear to Wear the Headtowel in Public After Trump Win—You Should Yell at Them”

“The fact is, when you give women rights, they destroy absolutely everything around them, no matter what other variable is involved ... Even if you become the ultimate alpha male, some stupid bitch will still ruin your life.”

—“Brad Pitt Losing Weight and His Mind After Whore Wife Ruins His Life”

Sections

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About / [Your Brain on Porn Book \(2nd edition\)](#) / Gary Wilson and Stefan Molyneux

Gary Wilson and Stefan Molyneux



Your Brain On Porn | Gary Wilson and Stefan Molyneux



One hour interview discussing *Your Brain On Porn*.



Time to get real about internet pornography
 Your Brain on Porn is available in audio, ebook, and paperback from \$5.99. Multiple translations are available.

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 Website that profits from collecting and selling data about users' sexual tastes offers users free... [t.co/8CkJvzh1fC](#)
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A "reboot" is a complete rest from artificial sexual stimulation, including internet porn. Reboot your brain with encouragement and education at www.rebootnation.org

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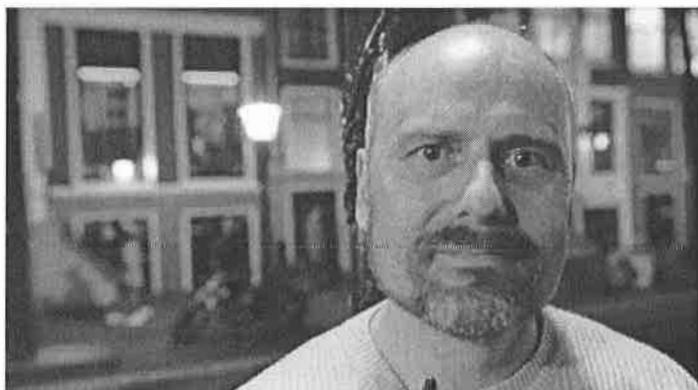


English



STEFAN MOLYNEUX

A libertarian internet commentator and alleged cult leader who amplifies “scientific racism,” eugenics and white supremacy to a massive new audience, Stefan Molyneux operates within the racist so-called “alt-right” and pro-Trump ranks.



EXTREMIST INFO

Born: 1966

Location: Mississauga, Ontario, Canada

Ideology: Alt-Right

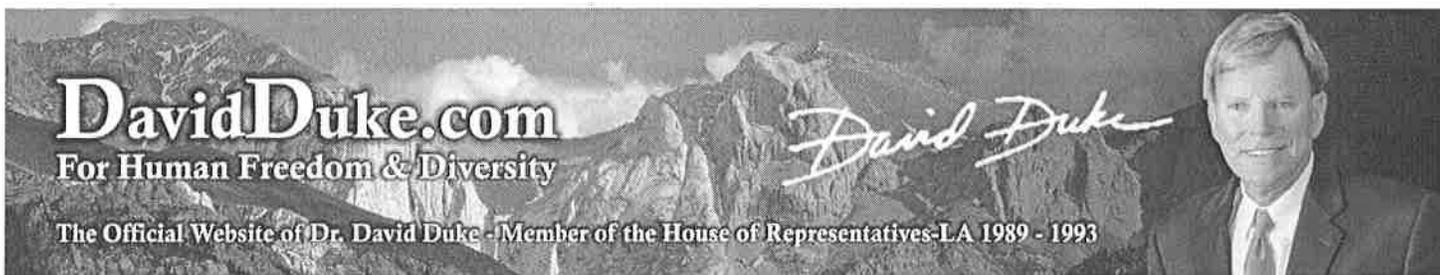
About Stefan Molyneux

A glance at Stefan Molyneux’s subscriber count (650,000+) on YouTube suggests that he is a charismatic, persuasive and influential individual. A skilled propagandist and an effective communicator within the racist “alt-right” and pro-Trump ranks, his promotion of scientific racism and eugenics to a large and growing audience is a serious concern. Molyneux has been delivering “race realist” propaganda, based on pseudo-scientific sources, to his audience on an ongoing basis for over two years, and thus has encouraged thousands of people to adopt his belief in biological determinism, social Darwinism and non-white racial inferiority. Molyneux puts considerable effort into cloaking the practical implications of these beliefs across his media platforms.

In his own words

“I don’t view humanity as a single species...”

—Podcast FDR2768, “Collective Guilt for Fun and Profit”, Saturday call-in show, August 9, 2014



(<https://davidduke.com>)

PERSONAL EVOLUTION([HTTPS://DAVIDDUKE.COM/CATEGORY/PERSONAL-EVOLUTION/](https://davidduke.com/category/personal-evolution/))

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> Porn Addiction — A Devastating Jewish Globalist Media Influence and How to Defeat It!

Porn Addiction — A Devastating Jewish Globalist Media Influence and How to Defeat It!

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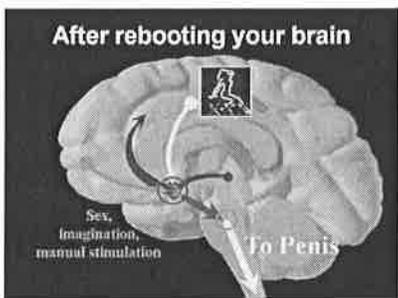
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(<https://pinterest.com/pin/create/button/?url=https%3A%2F%2Fdavidduke.com%2Fthe-great-porn-experiment-one-more-devastating-jewish-globalist-influence%2F&media=>)

(mailto:?)

subject=<http://%5BDavid+Duke.com%5D+Porn+Addiction+%26%238212%3B+A+Devastating+Jewish+Globalist+Media+Influence+and+How+to+Defeat+It%21&body=http://https%3A%2F%2Fdavidduke.com%2Fthe-great-porn-experiment-one-more-devastating-jewish-globalist-influence%2F>)



Commentary By Dr. David Duke

The following is an absolutely vital, and I mean truly vital video — especially for the male readers of www.DavidDuke.com, across Europe and around the world.

There is now overwhelming scientific evidence that Internet porn addiction is an epidemic, especially among men. It is an epidemic with many devastating effects upon men both young and old throughout the world. Not only has pornography been overwhelmingly dominated by Jews, as the article by Jewish professor Nathan Abrams shows, (you can find his article from the *Jewish Intellectual Quarterly* on this site) the Jewish porn kings are motivated not just by money but by racial hatred against Europeans. They see

pornography as a weapon of revenge for real or imagined European wrongs against Jews from the time of Romans to the modern day.

Of course it is not just Europeans who are affected by destructive, sick pornography, people of all races all over the world have been dehumanized and demoralized by this porn onslaught.
Privacy & Cookies: This site uses cookies. By continuing to use this website, you agree to their use. To find out more, including how to control cookies, see here: [Cookie Policy \(https://automattic.com/cookies/\)](https://automattic.com/cookies/)

Close and accept

Side 120 How tells us that pornography, addiction, and degenerate Jewish Capitalism is available in the later Jewish Defeat World. It also shows that this addiction leads often to failed human relationships, a numbing of human pleasure from other aspects of life, and even to sexual dysfunction, and this is even more damaging for young men. Because very young males are watching Internet porn it has a catastrophic effect on the forming structure of the brain itself — which is more malleable during early development.

Not only has the globalist porn industry been specifically dominated by Jews, the mainstream Jewish-dominated media has programmed America and the world to believe that even the sickest kinds of degenerate porn are perfectly acceptable and should be legal and available, even to children by way of the Internet.

Ironically, the same Ziomedia that tells us that sick, destructive porn is "freedom of speech" at the same time tells us that true political and social freedom of speech should be criminalized as quote, "Hate Speech."

In parts of Europe and other areas of the Western World, there are academics cast into prison for years for simply having an academic opinion that the Zionists don't like. Anything that exposes the Zionists, whether it is about the true origins of the Second World War or the Holocaust they demand that it be suppressed or even criminalized. This censorship is promoted while at the same time they demand that the sickest and most destructive porn must be made available to every kid with a smartphone.

The following video should be an eye-opener to every reader of www.DavidDuke.com.

And if you suspect that you might be developing an addiction to the pervasive presence of Internet porn, Gary Wilson offers some great techniques to break this addiction and restore yourself to a healthy mentality.

The following is a lecture to the famous TED speaking forum by Psychology Teacher Gary Wilson.

I heartily recommend it!

The great porn experiment | Gary Wilson | TEDxGlasgow



Related



Close and accept



DAVID DUKE

David Duke is the most recognizable figure of the American radical right, a neo-Nazi, longtime Klan leader and now international spokesman for Holocaust denial who has nevertheless won election to Louisiana's House of Representatives and once was nearly elected governor.



EXTREMIST INFO

Born: 1950

Group: EURO

Ideology: White Nationalist

About David Duke

He is also known for his avid pursuit of women and, especially, money — so much so, in fact, that he finally went to prison in 2002 for using cash raised to support white supremacist causes to pay for his own gambling and home improvements. Since then, Duke has become an itinerant anti-Semitic salesman, traveling regularly to Europe to sell his books while his latest white supremacist organization, EURO, remains almost entirely inactive.

In his own words

"Racial idealism, or racialism, is the idea that a nation's greatest resource is the quality of its people. It means examining all questions of government on the basis of whether the proposed measure is good or bad for our race. ... Neither Communism, Capitalism, nor any other materialistic doctrine can save our race; our only racial salvation lies in a White racial alliance uniting our people with the common cause of racial idealism."
— September 1970 article in *The Racialist*

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prause site: www.yourbrainonporn.com



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

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

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

Op-ed: Who exactly is misrepresenting the ... - Your Brain On Porn

<https://www.yourbrainonporn.com/.../op-ed-who-exactly-is-misrepresenting-the-scienc...> ▼

Apr 26, 2019 · On the surface it appears legitimate as 7 PhD buddies of author Nicole Prause signed off on it. However, upon closer examination we find that:

Analysis of "Data do not support sex as addictive" (Prause et al. 2017

prause site:yourbrainonporn.com



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Critique of Prause Study Rory C. Reid, Ph.D., LCSW (July 2013 ...

<https://www.yourbrainonporn.com/.../critique-of-prause-study-rory-c-reid-ph-d-lcsw-j...> ▼

Instead, it functions as a defense of the Nicole Prause study, and likely penned by Prause herself (at the time of this article Rory Reid's office was right next door ...

Is Nicole Prause Influenced by the Porn Industry? – Your Brain On Porn

<https://www.yourbrainonporn.com/.../is-nicole-prause-influenced-by-the-porn-industry/>

In 2013 former UCLA researcher Nicole Prause began openly harassing, libeling and cyberstalking Gary Wilson. (Prause has not been employed by an ...

Debunking the debunker: Critique of letter to the editor "Prause et al ...

<https://www.yourbrainonporn.com/.../debunking-the-debunker-critique-of-letter-to-th...> ▼

Jul 22, 2019 - In various comments, articles and tweets Nicole Prause has claimed that not only did Prause et al., 2015 falsify "a core tenet of the addiction ...



AMERICAN CIVIL LIBERTIES UNION
FOUNDATION

Southern California

June 21, 2019

Via E-Mail

Ms. Alisa C. Simmons
Fitch, Even, Tabin & Flannerty LLP
120 South LaSalle Street
Suite 2100
Chicago, IL 60603

Re: Your May 1, 2019 letter

Dear Ms. Simmons:

The demand in your May 1, 2019 letter to a group of academics and practitioners associated with the web site Real Your Brain On Porn¹ that they “[r]efrain from disparagement and defamation of YOUR BRAIN ON PORN and its principal and associates” is misguided for numerous reasons.

To the extent you are using disparagement to mean criticism or belittlement, as it is ordinarily defined, the request is improper. Criticism is protected by the First Amendment to the United States Constitution in the absence of both a provably false statement of fact about the person who claims he was injured, and the requisite level of fault, such as negligence or malice.

But, even if you are using disparagement to refer to a legal tort such as commercial disparagement, there is no basis to suggest that Real Your Brain on Porn has ever disparaged Your Brain on Porn, its principal, Mr. Gary Wilson, or his associates. First, the website does not mention Your Brain on Porn except in a disclaimer on the bottom of page of the website that states, “This web page has no relationship with yourbrainonporn.com.” Nor does the website ever mention Mr. Wilson or his associates. To prevail on a claim of disparagement, however, a plaintiff generally needs to show that there is both a false or misleading statement and that it specifically refers to the plaintiff. *See, e.g., Hartford Casualty Ins. Co. v. Swift Distribution*, 59 Cal.4th 277, 293-94 (2014). Because Real Your Brain on Porn does not refer to Your Brain on Porn (except in the no relationship disclaimer), Mr. Wilson, or his associates or make any false statements about them, there is no basis for you to demand that the publisher of the website or anyone associated with it refrain from disparagement of Your Brain on Porn, Mr. Wilson, or his

¹Douglas Braun-Harvey, MFT, CST, CST-S, James Cantor, PhD, Lynn Comella, PhD, Chris Donaghue, PhD, Peter Finn, PhD, William Fisher, PhD, Janniko Georgiadis, PhD, Victoria Hartmann, PhD, MPH, David Hersh, PhD, Erick Janssen, PhD, Marty Klein, PhD, Taylor Kohut, PhD, Justin Lehmillier, PhD, David J. Ley, PhD., CST, CST-S, Roger Libby, PhD, CST, Alan McKee, PhD, Charles Moser, PhD, MD, Samuel Perry, PhD, Nicole Prause, PhD, Anna Randall, DHS, MSW, MPH, Aleksandar Štulhofer, PhD, Jennifer Valli, PhD, Julia Velten, PhD, Michael A. Vigorito, LMFT, CGP, CST, and Jason Winters, PhD.

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associates.

Your demand that they refrain from defaming Your Brain on Porn, Mr. Wilson, or his associates is equally off-base. To prevail on a defamation claim, a plaintiff must show that a defendant made a provably false statement of fact. *See, e.g., Gregory v. McDonnell Douglas Corp.*, 17 Cal. 3d 596, 600 (1976); *Sanders v. Walsh*, 219 Cal.App.4th 855, 862 (2013). In addition, the First Amendment requires that “the statement on which the [defamation] claim is based must specifically refer to, or be ‘of and concerning,’ the plaintiff in some way.” *See, e.g., Blatty v. New York Times Co.*, 42 Cal.3d 1033, 1042 (1986). There is no statement on Real Your Brain on Porn that specifically refers to or concerns Your Brain on Porn other than the statement disclaiming any relationship between the two websites. Nor is there any statement about Mr. Wilson or his associates anywhere on Real Your Brain on Porn. The absence of such statements would doom any defamation claim, as would the absence of any provably false statement.

In sum, there is no possibility that Your Brain on Porn, Mr. Wilson, or his associates could prevail on a disparagement or defamation claim. Thus, your demand that people associated with Real Your Brain on Porn “refrain from disparagement and defamation” is misguided. Please refrain from making unsupported and misguided demands against Real Your Brain on Porn and people associated with it in the future.

Sincerely,



Peter J. Eliasberg
Chief Counsel
Manheim Family Attorney for
First Amendment Rights

9/10/2019

Gmail - Gary Wilson in Ashland, OR



Nicole Prause <[redacted]>

Gary Wilson in Ashland, OR

Linda C. Abbay <prolegallitigation@[redacted]>
To: Nicole Prause <[redacted]>

Wed, Jul 3, 2019 at 9:56 PM

Hi Nicole-

I attempted service today at 545 Grandview, but occupant stated we had the wrong address. She stated he was next door at 535 Grandview. I went over to that house and asked for subject. A lady and man opened the door wanted me to read the letter right outside I told her I wasn't going to read it for them that I was serving it and leaving it for him. She closed the door and I told her he was being served and dropped served it.

[Quoted text hidden]



Wilson Google Scholar harassment August 23, 2019

Gary Wilson submitted a pdf of this court filing, excluding the Defendant's response, to Google Scholar to be indexed. This will cause the filing to be emailed to thousands of scientists.

scholar.google.com/scholar?scipdf=1&oi=us&hl=en

Scholar

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[PDF] My name is Donald Hilton Jr., MD I am over the age of eighteen years. I have never been convicted of a felony or crime of moral turpitude, and I am fully ... [yourbrainonpom.com](#)

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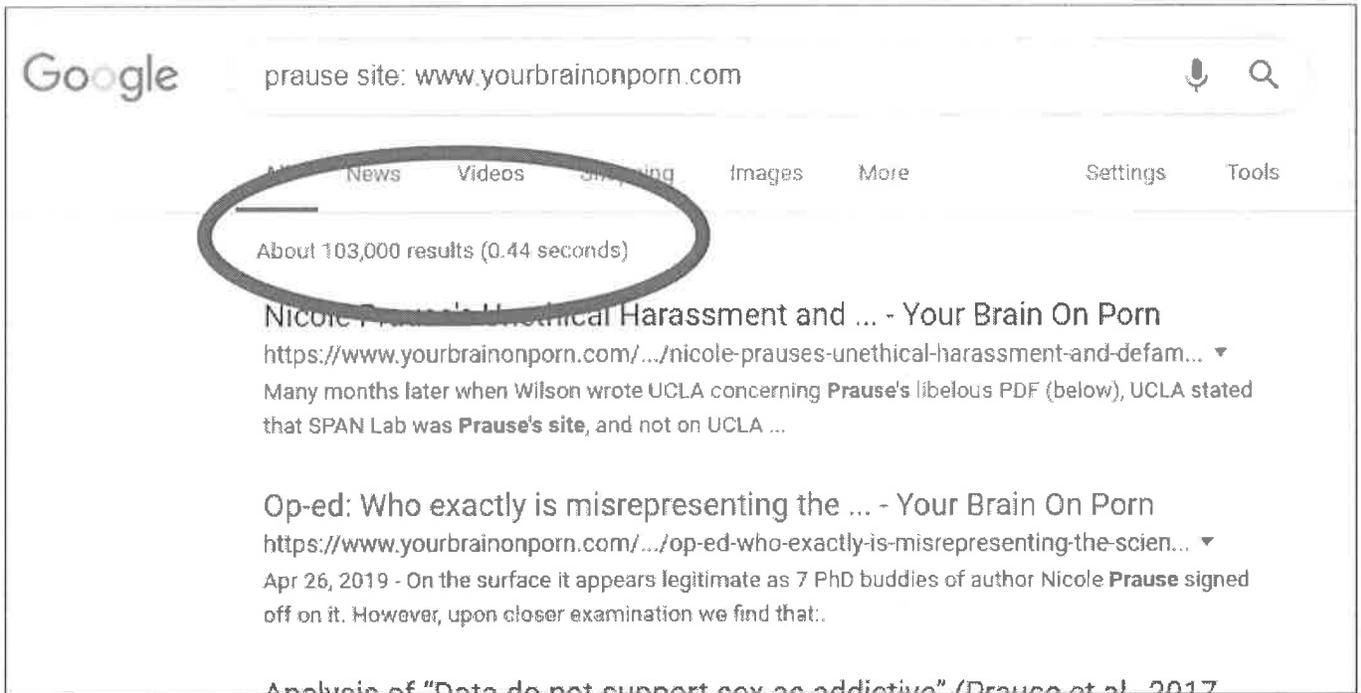
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K. Dawson, [A. Tafiro](#), [A. Stulhofer](#) - Aggressive behavior, 2019 - Wiley Online Library [Paperize](#)



Stalker Gary Wilson posts about Dr. Prause over 113,000 times on Internet



prause site:yourbrainonporn.com

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"Critique of Prause Study" Rory C. Reid, Ph.D., LCSW (July 2013 ...
<https://www.yourbrainonporn.com/.../critique-of-prause-study-rory-c-reid-ph-d-lcsw-j...> ▾
Instead, it functions as a defense of the Nicole Prause study, and likely penned by Prause herself (at the time of this article Rory Reid's office was right next door ...

Is Nicole Prause Influenced by the Porn Industry? – Your Brain On Porn
<https://www.yourbrainonporn.com/.../is-nicole-prause-influenced-by-the-porn-industry/>
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Debunking the debunker: Critique of letter to the editor "Prause et al ...
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Jul 22, 2019 - In various comments, articles and tweets Nicole Prause has claimed that not only did Prause et al., 2015 falsify "a core tenet of the addiction ...

STATE OF CALIFORNIA §
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COUNTY OF LOS ANGELES §

DECLARATION OF ALEKSANDAR STUHLHOFER, Ph.D.

1. My name is Aleksandar Štulhofer, Ph.D. I am a professor in the Faculty of Humanities and Social Sciences at the University of Zagreb in Croatia. I co-founded the Croatian Sex Therapists' Association. My research includes the effects of pornography and sexuality education.
2. As a Fulbright grant recipient, I was a fellow at The Kinsey Institute for Sex, Gender, and Reproduction during the period of March-July 2000. During that time Nicole Prause, Ph.D., was working and training at the same Kinsey Institute. We met there and while we have never collaborated together professionally, I am familiar with her research, we periodically continue to see each other at scientific meetings, and we share many colleagues.
3. At the Kinsey Institute I was made aware that we need to take security measures in our work, including extra security in both hardware and personnel monitoring those entering the Kinsey Institute and procedures for exits at the Kinsey Institute, among other precautions.
4. I became aware of Judith Reisman while I was a fellow at The Kinsey Institute, as she was making a number of claims to media, in books, and movies to which the Kinsey Institute was responding.
5. In 2012 and 2013, I have coordinated an expert group's work on a comprehensive sexuality education module (a part of the Health Education curriculum) that was formally introduced in Croatian primary and secondary schools. In early 2013, a local non-governmental organization, opposed to the curriculum, organized Dr. Reisman's visit to Croatia. At the end of our public debate about sexuality education, initiated by Reisman and her hosts, she accused me of "collaborating with a certified pedophile" solely on the basis of my co-editing of a 2005 scholarly book on sexuality in Eastern Europe and Russia with a Dutch psychologist. Her attack was followed by more of similar accusations from local faith-based groups. During her public lecture immediately following our debate, Dr. Reisman cited a table #34 from the book "Sexual Behavior in the Human Male" as evidence that A. Kinsey directed child abuse. She also emphasized that I was "educated at the Kinsey Institute".
6. I was aware that Reisman sued The Kinsey Institute, Indiana University, Bloomington, and Kinsey Institute director June Reinisch around 1991-1994 for defamation for defending themselves from her accusations. I am aware that her claims were dismissed with prejudice.



7. In 2014, I hosted the International Academy of Sex Research meeting in Dubrovnik, Croatia, which Dr. Prause attended as a speaker. Repeating some of the allegations made by Reisman during her second visit to Croatia, a local non-governmental organization called for protests against this meeting (which, eventually, did not take place). As the host, I was very concerned about this and was in constant contact with management of the hotel where the meeting was taking place.
8. I have never had any criminal charges filed in connection with Reisman's claims. I never participated in, nor witnessed, any testing of youth during any time I was at the Kinsey Institute. I am aware that many of my colleagues at the Kinsey Institute, including Dr. Prause, have faced similar claims of being, directly or indirectly, involved in child molestation due solely to our affiliation with the Kinsey Institute. I am unaware of any criminal charges that have ever been filed against any of my colleagues regarding such claims about the Kinsey Institute.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on August 20, 2019.

A handwritten signature in black ink, appearing to read 'Štulhofer', written in a cursive style.

Professor Aleksandar Štulhofer, Ph.D.



INDIANA UNIVERSITY

**OFFICE OF THE VICE PRESIDENT
FOR RESEARCH**

01 August 2019

RE: False allegations against Dr. Alfred C. Kinsey and The Kinsey Institute.

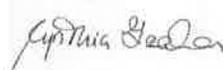
Since 1947 The Kinsey Institute has remained dedicated to the scientific and scholarly study of human sexuality. The Kinsey Institute Library and Special Collections contain no materials known to be illegal, and the research programs of the Kinsey Institute research faculty are expected to conform to best research practices and ethical standards of the time. The Kinsey Institute has never carried out sexual experiments on children, either during Professor Alfred Kinsey's time as Director or since. Allegations against Kinsey concerning this information about children's sexual responses were first made in 1981 by Judith A. Reisman. She subsequently enlarged on these ideas in a book written jointly with Edward Eichel and published in 1990 [*Kinsey, Sex, and Fraud*]. When the Kinsey Institute responded with evidence to the contrary, Reisman filed suit in 1991 against The Kinsey Institute, then Director June Reinisch, and Indiana University, alleging defamation of character and slander. In September 1993, Reisman's lawyer withdrew from the case, and in June 1994 the court dismissed Reisman's case with prejudice [which means that Reisman is prohibited from refiling the suit].



7. As an employee at Indiana University and the Kinsey Institute myself from 1996 to 2004, I am aware that we had to take safety precautions due to the activities of activists against sex researchers. Dr. Prause and I both followed the safety procedures at the Kinsey Institute.
8. I am aware that Judith Reisman was one such activist about whom we had safety concerns. Reisman created a public Facebook group to protest the International Academy of Sex Research meeting in Dubrovnik, Croatia. One of the public Facebook posts to Reisman's group stated that all the meeting attendees should be murdered by being drowned. I saw the post live on Facebook at the time. As a result of this public threat by Reisman's group, one of my students no longer felt safe to attend the meeting and did not give her presentation as a result. Dr. Prause also was a speaker at that meeting. Dr. Prause and I attended despite the threat to our safety by Reisman's group.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on September 10, 2019.



Cynthia A. Graham, Ph.D.

University of Texas Health Science Center public records all indicate Hilton has no relationship with
the University

No record of Hilton was recovered in the Freedom of Information Act request

--- Please respond above this line ---



Dear Requestor,

On behalf of the Public Information Officer and under the Texas Public Information Act, I am responding to your open records requests received on April 24, 2019.

You requested the following: *"Employment history, teaching, and salary of Donald Hilton, MD. He lists himself as an "adjunct" in the Department of Neurosurgery, but I was unable to find any active record of him on the website. In the data range provided, I do not need teaching records for all years, only the last two years, if such records exist.."*

The University of Texas Health Science Center at San Antonio has no records reflecting that Donald Hilton, M.D. is now or ever has been an employee of the University.

If you have any questions, please feel free to contact our office.

Sincerely,

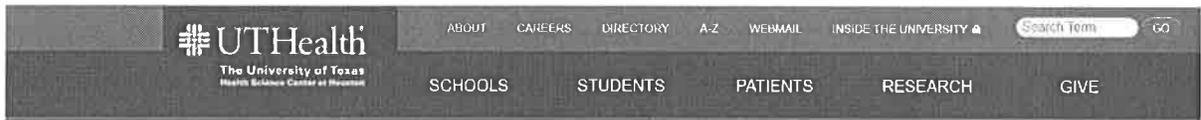
Alain Arrieta
Legal Administrative Coordinator
Office of Legal Affairs

OFFICE OF LEGAL AFFAIRS | Mail Code 7837 | 7703 Floyd Curl Drive | San Antonio, Texas 78229-3900
210.567.2020 | uthscsa.edu



Hilton is not in the university directory

https://peopledirectory.uth.tmc.edu/peopledirectory/index.jsp?cname=Donald+Hilton&gripsearch=all&simpleSearch=Search



The navigation bar features the UTHealth logo on the left, which includes the text "The University of Texas Health Science Center at Houston". To the right of the logo are several menu items: ABOUT, CAREERS, DIRECTORY, A-Z, WEBMAIL, and INSIDE THE UNIVERSITY. Further right is a search box labeled "Search Term" with a "GO" button. Below these items are larger, bolded navigation links: SCHOOLS, STUDENTS, PATIENTS, RESEARCH, and GIVE.

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Hilton is not on any web page for the Department of Neurosurgery

neurosurgery.uthscsa.edu/team-members/

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DECLARATION OF BETHANN MCLAUGHLIN, PH.D.

1. My name is BethAnn McLaughlin, Ph.D. I am a neuroscientist and founder of the non-profit organizations MeTooSTEM and Academic Decency League, Inc. I earned my doctorate in Neuroscience from the University of Pennsylvania and was a postdoctoral fellow at the University of Pittsburgh. I served a faculty member at Vanderbilt University School of Medicine for 17 years
2. I have served as a Reviewing Editor at Journal of Neuroscience for the last five years and prior to that, I was an Associate Editor. The Journal of Neuroscience is the flagship journal of the Society of Neuroscience, the largest national society of neuroscience researchers in the world.
3. I was awarded the MIT Disobedience Award for Social Justice Activism and non-violent protest in 2018. The Disobedience Award is the largest social justice award in the world.
4. In my role as Founder of MeTooSTEM, I have spoken on dozens of college campuses, been invited to speak to the National Institutes of Health on the impact of sexual misconduct on the lives of academic researchers and received awards from scientific societies for advocacy for women in science.
5. My expertise is in sexual misconduct, institutional and individual retaliation and restorative justice. I have been trained by the state of Pennsylvania in emergency response to sexual assault.
6. I have not met Dr Nicole Prause, but I have spoken to her and reviewed her curriculum vitae, publications and the statements by Donald Hilton.
7. Dr Nicole Prause is an accomplished, respected academic. Based on her H-index, an objective measure of the impact of her work in the scientific literature, her work falls within the top 10% of all academics in human sexuality, psychiatry and affective disorder in the world. The field of human sexuality is highly competitive. Fewer than 1 in 8 grants are awarded and Dr Prause received funding from a variety of foundations and federal agencies.
8. Dr Prause’s work as a reviewer is noteworthy for someone of her rank. As an editor, we seek out individuals who well versed in science, medicine and policy to provide rational, constructive, balanced and insightful feedback. Finding this attributes in a relatively young scientist speaks to Dr Prause’s maturity and the trust she has engendered in her colleagues.

9. The field of sexual health, women's physiology and wellness and the influence of pornography on public health, associations with wellness and sexual dysfunction are poorly understood and understudied.
10. Funding for public health and scholarship programs are underwritten by funding from any combination of institutional (academic), national, non-profit and for-profit grants and partnerships.
11. Partnerships between individuals in academia and non-profit corporations, for-profit corporations and government grants are considered standard forms of funding studies and incentivizing stakeholders to participate in academic work within the educational sector.
12. All sources of funding are disclosed in work published or presented by scholars. All of the publications available in public repositories of Dr Prause's studies are compliant with these guidelines and acknowledge her sources of funding.
13. Allegations that Dr Prause is 'pro porn' are not supported by her publication record. Her publications acknowledge pornography is consumed avidly in the United States, an observation that has been supported by other researchers.
14. Allegations that Dr Prause engaged in child endangerment in her funded work are not supported by data she has published or studies that were approved.
15. Dr. Prause investigates if porn is harmful through the lens of physiology, psychology, and addiction to define the individual and public health impact of the expansive and pervasive porn industry beyond if porn is "good" or "bad".
16. The rights of subjects who participate in studies are overseen via a series of protections that have evolved over time to ensure that there is a 'no harm' mandate. During her work in academic institutions, Institutional Review Boards (IRBs) oversee surveys, site visits, interventional studies and clinical tests involving human subjects. IRBs are comprised of physicians, staff, administrators and community members to provide balance and ethical certainty that the educational materials, oversight and regulatory parameters are in compliance with laws and principles governing biomedical and behavioral research.
17. Dr Prause's collaborations with individuals who engage in sexual acts for pay is similar to other ways academics engage outside experts. The idea that if you want to understand sex, sexuality and arousal, you need to engage stakeholders who do this as a part of their daily lives is a reasonable use of outside experts in my opinion and the opinion of the oversight boards that approved these studies.
18. Dr Prause has trained with individuals who are considered to be at the forefront of sexuality. Women's reproductive health, sexuality and wellness are understudied and underfunded compared to similar historical funding of male anatomy, physiology and dysfunction.

19. The male sexual experience has historically been centered in what has been called 'human physiology'. Work of Dr Prause and her colleagues has changed both the public perception of the importance of women's wellness and the ability to define unique biological and psychological factors that contribute to reproductive health and sexuality.
20. Dr Prause has experienced public backlash for her work. This is common for women in academia, not just women who seek to understand the role of pornography in understanding human sexuality. Most women in science, technology, engineering and math are subject to gender discrimination, sexual harassment and retaliation. Academic protections for reporting these kinds of negative events are incomplete and are associated with the high level of attrition of women from these fields.
21. Universities offer little in the form of protections for physicians and scientists who experience sexual harassment, campaigns of misinformation and discrimination. Title IX and Equal Opportunity offices can investigate a small fraction of allegations but public disclosure and support of individuals who have been stalked, harassed and harmed are insufficient with most women reporting that these process are perpetuating harm rather than implementing protections.
22. Most cases of sexual misconduct (including targeted harassment) are not investigated by universities. The false reporting claims of sexual misconduct are on par with false reporting of other felonies (2%).
23. Most women who reported they experienced sexual misconduct do not file claims. The most common reasons cited for non-reporting are lack of community and institutional reports, fear of retaliation and desire to seek emotional well-being outside of institutional structure.
24. The belief that women will be retaliated against when reporting sexual misconduct, gender discrimination, stalking and bias are real. Women report that they do not initiate claims of sexual misconduct.
25. Title IX and affirmative action offices were only deployed on campuses during the Obama administration. The majority of Title IX administrators surveyed report that they are significantly understaffed to investigate allegations even the most violent forms of sexual misconduct.
26. The work of Academic Decency and MeTooSTEM, the non-profits I founded, are designed to fill these gaps. We provide security protections, medical and mentoring supports to whistleblowers and survivors of stalking, harassment and sexual misconduct.
27. Based on my expertise in sexual misconduct, targeted harassment of women and retaliation, the activities of Donald Hilton targeting Dr Prause with allegations she actively engages in pornographic acts and support are detrimental to her professional reputation as a care giver, researcher and academic.

28. If Dr Hilton has concerns about protection of human subjects and clients, there are a host of law enforcement, supervising medical, professional and research organizations that could be engaged in order to ensure client safety. Public declarations about Dr Prause's sexual proclivities are gendered, harmful and discriminatory.

29. Dr Hilton has used his positions of professional privilege and claims of academic affiliation as a means to further his narrative.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on September 19, 2019.

BethAnn McLaughlin, Ph.D.