

KOBYLINSKI + KOBYLINSKI

BROTHERS AT LAW

MITCHELL BUILDING
304 ROSS ST., SUITE 510
PITTSBURGH, PA 15219
412.281.6600 TEL
412.281.6610 FAX

K O B Y . L A W

August 22, 2024

David M. Kobylinski, Esquire
dave@koby.law

Taylor & Francis Group
4 Park Square
Abingdon
OX14 4RN
United Kingdom

Taylor and Francis (Journals)
530 Walnut Street, Suite 850
Philadelphia, PA 19106

RE: My Clients: Alexander Rhodes & NoFap LLC

Dear Taylor & Francis:

My firm has been retained by Alexander Rhodes and NoFap LLC in regard to a defamatory publication entitled "Violence on Reddit Support Forums Unique to r/NoFap" co-authored by Nicole Prause and David Ley, which you published in November of 2023. My client has reached out to you on multiple occasions in which he advised this article contained numerous false and defamatory statements, was based on extensive data falsification, was published in breach of a contract, and was authored by persons with undeniable and clear conflicts of interest. Of note, my clients have previously commenced litigation against Prause and have also been creditors against her in bankruptcy proceedings. Furthermore, the co-authors of this article are known associates of the pornography industry. A high-level Pornhub employee, Gary Nugent, was even listed in the metadata of a spreadsheet used in the collection of opposition research that was ultimately incorporated into this defamatory publication. Rather than retract the article in light of this serious academic fraud and misconduct, you have chosen to sweep it under the rug. Your failure to retract this publication has caused my client untold damage and erodes public trust in the scientific publishing process. Your failure to retract has also caused you to become part of a larger civil conspiracy that we believe to be financed by Pornhub.com.

As more and more jurisdictions are enacting age verification requirements to visit pornographic sites and more professionals recognize the adverse effects associated with excessive pornography use, Pornhub seems to consider these risks to its bottom line. As a result, Pornhub has undertaken extensive efforts to characterize its product as not only safe but even healthy in all amounts, while demonizing those who report otherwise. Like the tobacco industry decades ago, Pornhub and its lobbying arm *Free Speech Coalition*

are collaborating with pseudoscientists, namely Nicole Prause and David Ley, to obstruct the scientific community and mislead the public about the effects of its product. Pornhub has taken pains to characterize common-sense criticisms of its product as being religiously affiliated, politically right-wing, or shame-based, while spreading disinformation (such as astroturfing Wikipedia pages), suppressing scientific research, and attempting to influence individual professionals and groups such as the *World Health Organization* and the *International Society of Sexual Medicine*. In other words, Pornhub and its affiliates have endeavored to intentionally introduce false controversy into utterly non-controversial concepts: that excessive pornography use can cause adverse effects, that children should not use pornography, and that reducing or quitting pornography use can lead to benefits in people's lives, particularly those struggling with behavioral addiction.

As such, NoFap, a secular recovery peer support website that has never advocated for pornography use to be banned or otherwise restricted for consenting adults, has been targeted with a disinformation campaign by Pornhub and its collaborators. Rather than leaving addicts alone to recover without interference, Prause and her associates have engaged in a campaign of harassment against Mr. Rhodes, NoFap and many others, including, but not limited to Gary Wilson from Your Brain on Porn, Darryl Mead of the Reward Foundation, Donald Hilton, Stefanie Carnes of IITAP, and Trish Leigh. The campaign of harassment is so prolific that the same cannot easily be summarized succinctly in this letter, and it even resulted in the suicide of one of its targets. Pornhub has similarly targeted critics of sexual exploitation (e.g., Pornhub's alleged distribution of child sexual abuse content), such as Laila Mickelwait of the #Traffickinghub movement.

Mr. Rhodes previously sued Prause and her entity Liberos LLC for defamation and other causes of action in the United States District Court for the Western District of Pennsylvania. As a result of the litigation settlement, Prause was subject to a non-disparagement agreement. Dr. Prause violated the same through the publication of the defamatory paper published by Taylor & Francis. We have obtained evidence that she did so with the aid and assistance of Pornhub. Your refusal to retract, despite being presented with clear and irrefutable evidence of wrongdoing, has made Taylor & Francis, at the very least, a civil co-conspirator in this matter.

Please note that it is my client's intent to commence a lawsuit against Pornhub in the immediate future, and we plan to name Taylor and Francis as a co-defendant. If your organization would like to avoid the expense and burden of litigation, kindly note that my clients have authorized me to extend a demand that includes:

- a) compensation of \$20,000,000.00 (USD);
- b) retraction of the article; and
- c) a published apology which discloses the academic fraud and the clear and undeniable conflicts of interest held by the authors of the article.

In addition, this letter requests your immediate action to preserve electronically stored information that may contain evidence important to the above legal matter. This notice applies to your on- and off-site computer systems and removable electronic media plus all computer systems, services, and devices (including all remote access and wireless devices) used for your company's overall operation. This includes, but is not limited to, e-mail and other electronic communications; electronically stored documents, records, images, graphics, recordings, spreadsheets, databases; calendars, system usage logs, contact manager information, telephone logs, internet usage files, deleted files, cache files, user information, and other data. Further, this notice applies to archives, backup and disaster recovery tapes, discs, drives, cartridges, voicemail and other data. All operating systems, software, applications, hardware, operating manuals, codes, keys and other support information needed to fully search, use, and access the electronically stored information must also be preserved.

The importance of immediate action cannot be overstated. Electronically stored information is easily corrupted, altered, and deleted in normal daily operations. Even booting a drive, running an application, or reviewing a document can permanently alter evidence. An important method for preserving data in its original state is to have a forensic image (mirror image or clone image) made of pertinent hard drives of both office and home computers used for business and of network servers. This image captures all current data, including the background or metadata about each document. Simply copying data to a CD-ROM or other common backup medium is not adequate. For each captured image file, record and identify the person creating the image and the date of creation. Secure the file to prevent subsequent alteration or corruption and create a chain of custody log. Once the forensic data image file is created, the pertinent computer or other device can be placed back into operation.

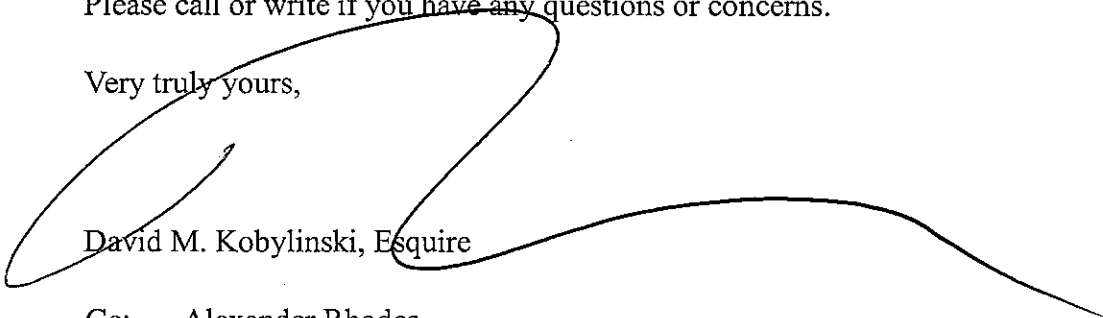
This preservation notice covers the above items and information between the following dates: from the date January 1, 2022 to the present date.

Current law and rules of civil procedure clearly apply to the discovery of electronically stored information just as they apply to other evidence and confirm the duty to preserve such information for discovery. Your officers, employees, agents, and affiliated organizations must take all reasonable steps to preserve this information until this legal matter is finally resolved. Failure to take the necessary steps to preserve the information addressed in this letter or other pertinent information in your possession or control may result in serious sanctions or penalties.

Further, to properly fulfill your preservation obligation, stop all scheduled data destruction, electronic shredding, rotation of backup tapes, and the sale, gift or destruction of hardware. Notify all individuals and affiliated organizations of the need and duty to take the necessary affirmative steps to comply with the duty to preserve evidence.

Please call or write if you have any questions or concerns.

Very truly yours,



David M. Kobylinski, Esquire

Cc: Alexander Rhodes