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**AFFIDAVIT OF WAYNE WEST IN SUPPORT OF
NOTICE OF APPLICATION FOR COURT ORDERS**

IN THE SUPREME COURT OF JUDICATURE OF JAMAICA

IN THE CIVIL DIVISION

CLAIM NO. 2013 HCV 00650

Filed by: JCHS

WW

Date Sworn: 23/4/2014

Date Filed: 24/4/2014

IN THE MATTER of THE CONSTITUTION OF
JAMAICA

A N D

IN THE MATTER of an Application by
JAVED SAUNJA JAGHAI, alleging the
infringement of his rights under sections
13(3)(j)(i)-(iii) and 13(3)(g) of the Charter
of Fundamental Rights and Freedoms
(Constitutional Amendment) Act, 2011

A N D

IN THE MATTER of an Application by
JAVED SAUNJA JAGHAI for
constitutional redress pursuant to
Section 19 of the said Charter

BETWEEN	JAVED SAUNJA JAGHAI	1st CLAIMANT
AND	J-FLAG MANAGEMENT LIMITED (J-FLAG)	2nd CLAIMANT
AND	THE ATTORNEY GENERAL OF JAMAICA	DEFENDANT
AND	THE CHURCHES	
	MEMBERS OF CHRISTIANS FOR TRUTH AND JUSTICE	
	JAMAICA COALITION FOR A HEALTHY SOCIETY LTD	
	HEAR THE CHILDREN'S CRY	
	LAWYERS' CHRISTIAN FELLOWSHIP	
	CARIBBEAN DAWN	INTERESTED PARTIES

I, **WAYNE WEST**, being duly sworn make oath and say that:

(1) For the purposes of this Affidavit I have my postal address at 9 Cecelio Avenue, Kingston 10.

(2) I am a medical practitioner, consultant radiologist and a Director of Jamaica Coalition for a Healthy Society Limited (hereinafter referred to as JCHS).

(3) The principal purpose of the claim of the Claimants herein is to achieve the decriminalization of buggery between consenting adult males.

(4) The Coalition also firmly believes that there are strong and compelling public health, public policy and philosophical considerations for the maintenance of the present status quo in Jamaica. That enabling the acceptance of same sex behaviour as a normal and acceptable alternative lifestyle will cause Jamaica to enter into a social experiment, unsubstantiated by scientific data.

(5) We are also of the view that a number of the arguments, assertions and/or statements put forward by the Claimants are fallacious and we seek permission from this Honourable Court to be heard in order to expose them, using experts and rational argument.

(6) We are of the view that it would greatly assist the Court in its deliberations to have the benefit of expert evidence. That to that end we had filed an Application for an Expert Witness on May 17, 2013. Due to circumstances beyond our control the expert named in that Application became unavailable and so we did not then advance it. We are now applying for Dr. **JUDITH GELERNTER REISMAN** of Virginia, United States of America to be appointed as an expert witness and be permitted to file an expert report. Exhibited hereto marked "WW23" for identity is the Curriculum Vitae of Dr. **JUDITH GELERNTER REISMAN**.

(7) An examination of the Affidavits and Report filed by the Claimants and their Expert Witness makes it clear that they are proceeding on a presumption of normality and acceptability of homosexual behaviour by the Claimants and Expert Witness:

-In the Amended Affidavit of the 1st Claimant Javed Jaghai, filed herein on July 5, 2013, paragraph 3 in which he describes his and his employer's (J-FLAG) mission "to promote social change by empowering the Jamaican LGBT community and by building tolerance for and acceptance of the LGBT community by the wider Jamaican society."

-paragraph 7 of said Affidavit in which Mr Jaghai asserts that his self-identification as a homosexual males was "...not an oddity or an aberration but was a natural manifestation of one of a range of normal human sexual responses".

-paragraph 11 of said Affidavit in which Mr Jaghai claims a "right to express [his] human sexuality and to establish and nurture relationships with consenting adult partners without outside interference".

-paragraph 27 of said Affidavit in which Mr Jaghai claims that "private consensual adult same-gender intimacy should be decriminalised as a matter of sound governance on public health policy grounds."

-paragraph 14 of the Affidavit of the 2nd Claimant Dane Lewis filed herein on December 3, 2013 on behalf of J-FLAG Management Ltd, in which he, Mr Lewis, asserts that criminalisation of buggery is inconsistent with "the values of a modern, democratic nation".

-paragraph 23 of the Report of Expert Witness, Professor Chris Beyrer MD, MPH filed herein on December 9, 2013 in which he asserts that the rationale for criminalisation arises from a "complicated and diverse host of religious and historical perspectives", and also paragraph 29 in which he argues that "stigmatization...coupled with criminalisation laws...enters the everyday sociocultural and political landscapes."

We are of the view that Dr Reisman's qualifications along with her research in this particular field will be of assistance to the Court in analysing the basis of these

presumptions and assumptions. Additionally she will be able to provide another perspective to the “rationale for criminalisation”.

(7) Dr Reisman has a background and experience in the fields of Science Fraud, Human Sexuality, Child Sexual Abuse, and Mass Media Effects. She has been an expert witness in many court, military, and civic hearings concerning child pornography, pornography, homosexuality, sexual harassment, and media issues. Dr. Reisman is also a former consultant to four U.S. Department of Justice administrations, the U.S. Department of Education, as well as the U.S. Department of Health and Human Services.

(9) Dr Reisman's publications have been referenced in a number of lower court decisions and US Supreme Court cases as well as the impetus behind the proposed child protection legislation in the State of Washington D.C. The United States Department of Justice has also published Dr. Reisman's reports on the Role of Pornography and Media Violence in Family Violence, Sexual Abuse and Exploitation, and Juvenile Delinquency. Part 1, NCJ 107147, [PDF](#) (24.7 MB) [NCJRS Abstract](#); Part 2, NCJ 107148, [PDF](#) (27.1 MB) [NCJRS Abstract](#); Part 3, NCJ 107149, [PDF](#) (16.8 MB) [NCJRS Abstract](#); and Part 4, NCJ 109944, [PDF](#) (7.5 MB) [NCJRS Abstract](#).

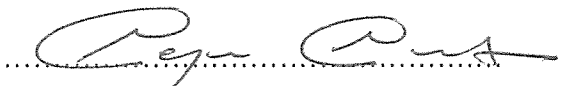
(10) Further, one of Dr Reisman's publications was influential in a 2013 decision by the Croatian Constitutional Court's abolition of a new Health Education Curriculum which contained controversial approaches to sexual and gender equality and sexually responsible behavior and held to have violated the Croatian Constitution, the Education Act, the Family Act and international conventions such as the Universal Expert Report of Human Rights, the International Covenant on Civil and Political Rights, and the Convention on the Rights of the Child.

11) The Coalition believes that Dr Reisman's particular expert knowledge of the historical and scientific bases relied on by the 1st and 2nd Claimants and the Expert Witness Professor Chris Beyrer in advocating for the normalisation of homosexual behaviour, the indisputable linkage between these historical and scientific bases and the demand for decriminalisation of homosexual acts being sought by the Claimants and Expert Witness, will be of vital assistance to this Honourable Court.

12) The Coalition is also firmly of the view that in addition to her academic and practical qualifications, the extensive breadth of Dr Reisman's research and close observation of the sociological implications of normalising homosexual behaviour, in particular the impact on children, render her a valuable expert resource to this Honourable Court.

13) We pray that this Honourable Court will grant the Order allowing for the appointment of Dr Reisman as expert witness.

SWORN to by the said **WAYNE WEST**)
at *10 Caelio Avenue*)
in the parish of: *St Andrew*)
this *23rd* day of *April* 2014)
before me: *Carmen MORRIS*)
.....*C. Morris*.....


.....
WAYNE WEST


Justice of the peace for the parish of:
St Catherine

Filed by **BRAHAMLEGAL**, Attorneys-at-Law, Unit # 6, 32 Lady Musgrave Road, Kingston 5, in the parish of St. Andrew, Attorneys-at-Law for and on behalf of the Applicant herein; Telephone No. (876) 927-9061; Facsimile (876) 927-9060.

WW23

This is the document referred to in paragraph 6 of the Affidavit of Wayne West in Support of Notice of Application for Court Orders sworn before me on the 23rd day of April 2014.


WAYNE WEST



JUSTICE OF THE PEACE
for the parish of:
St Catherine

Filed by **BRAHAMLEGAL**, Attorneys-at-Law of Unit # 6, 32 Lady Musgrave Road, Kingston 5, in the parish of St. Andrew, Attorneys-at-Law for an on behalf of the Applicant herein; Telephone No. (876) 927-9061; Facsimile (876) 927-9060.

Curriculum Vitae

Brief Vitae of Judith A. Reisman, PhD

AUTHOR: BOOK PUBLICATIONS

Sexual Sabotage, WND Books, Washington DC, 2010

Kinsey, Crimes & Consequences, The Institute for Media Education, Crestwood, KY, 1998, 2000, 2003, 2011

Partner Solicitation Language as a Reflection of Male Sexual Orientation, with Charles B. Johnson, Ph.D., The Institute For Media Education, Arlington Virginia, 1995

Soft Porn Plays Hardball, Huntington House, Lafayette, LA, 1991

Kinsey, Sex and Fraud, Judith Reisman et al., Huntington House, Lafayette, LA, 1990

Images of Children, Crime and Violence in Playboy, Penthouse, and Hustler
US Dep. Justice Grant No. 84-JN-AX-K007, 1986, 1987, 1989, 1990
DOJ website citation (link opens new window)

EDUCATION

Ph.D. 1980 in Communications, Case Western Reserve University M.A. 1976 in Communications, Case Western Reserve University

ACADEMIC POSITIONS

- Visiting Professor of Law, Liberty University School of Law, 2011
- Adjunct faculty, George Mason University, 1990
- Research Full Professor, The American University, 1983-85
- Asst./Assoc. Prof., (Martze) University of Haifa, Israel, 1981-83

PARTIAL LIST OF INCLUSIONS/CITATIONS TO RESEARCH AND FINDINGS IN BOOKS AND OTHER PUBLICATIONS:

- Savage, M., (2005) *Liberalism is a Mental Disorder*, Nashville, Tennessee, Nelson
- Current. Savage's criticism of Kinsey's use of fraudulent data and sex crimes against
- children to launch the sexual revolution
- Kupelian, D., (2005) *The Marketing of EVIL*, Nashville, Tennessee, WND Books, The
- citation of Reisman's findings of Kinsey's fraudulent data and sex crimes against
- children launched a bizarre and aborted faculty attack on Ohio State University
- Reference librarian, Scott Savage, April-May 2006--as of this writing Mr..
- Savage is contemplating defamation litigation
- Brinkman, S., (2004) *The Kinsey Corruption: An Expose*, Catholic Standard and Times,
- Ascension Press, West Chester PA (book based on Reisman's findings)
- Wagner, T., (2003) *Back to the Drawing Board*, "The Kinsey Culture: Sex on Demand,
- Abortion on Demand," South Bend, St. Augustine's Press (chapter)
- Kastleman, M. (2001) *Internet Pornography: The Drug of the New Millennium*, Orem,
- Jones, E. Michael (2000) *Libido Dominandi: Sexual Liberation and Political Control*,
- South Bend IN: St. Augustine's Press (citation)
- Ericksen, J. and Steffen, S., *Kiss and Tell: Surveying Sex in the Twentieth Century*, Jones,
- Cambridge, Harvard University Press, 1999 (citation)

-
- E. Michael (1993) *Degenerate Moderns: Modernity as Rationalized Sexual Misbehavior*, San Francisco, CA, Ignatius (citation)
-
- Chalfant, J. (1999) *Abandonment Theology: The Clergy and the Decline of American Christianity*, Winter Park, FL (citation)
- Mack, D. (1997) *The Assault on Parenthood* Simon and Schuster, (citation)
- Brennen, W. (1995) *Dehumanizing the Vulnerable*, Loyola University Press (citation)
- Zillmann, D. (1994) *Media, Children and The Family*, NJ: Erlbaum (JAR article)
- Ruggiero, V.R. (1994) *Warning, Nonsense is Destroying America*, Nashville: Nelson (citation)
- Wolinsky, M. (1993) *Gays and the Military*, Princeton University Press: Princeton, NJ: Judge Gasch's ruling and the *Lancet* cite to Dr. Reisman on Kinsey's fraud.
- Hattermer, B. (1993) *Don't Touch That Dial*, Lafayette, LA: Huntington House (JAR article)
- Trento, S. (1992) *The Power House*, NYC: The New Press (citation)
- Kincaid, C. (1992) *The Playboy Foundation*, Washington DC: Capital Research Center (citation)
- Bolton, R. (1992) *Cultural Wars*, NYC: The New Press (JAR article)
- Osaka, F. (1989) *Source Book of Pornography*, MA: Lexington (citation)
- Zimbardo, P. (1988) *Psychology and Life*, MA: Scott, Foreman (citation)
- Mawyer, M. (1987) *Silent Shame*. Westchester, IL: Crossways (citation)
- Burgess, A. (1986) *Sexual Exploitation of Patients*, NYC: Garland (JAR article)
- McCuen, E. (1985) *Pornography and Sexual Violence*, WI: Gem (JAR article)
- Lederer, Laura (1981) *Take Back the Night*, NYC: Bantam (JAR article/interview)
- Skirball Museum (1974) *A Walk Through the Past*, CA: Hebrew Union College (JAR epic poem)
-

GUEST LECTURER

- Liberty University
- Princeton University
- Georgetown University
- American University
- University of Jerusalem
- University of Haifa
- Rutherford Institute
- Texas Woman's University
- Clarkson College
- Notre Dame University
- University of Kentucky
- Pepperdine University
- Council for National Policy
- Human Life International
- Johns Hopkins University Medical School
- Tel Aviv University
- Accuracy in Academic

- Accuracy in Media
- Concerned Women for America
- Rutherford Institute
- The Abstinence Clearinghouse
- American Society of Criminology
- North Carolina Psychiatric Association
- Israeli Army Air Force Academy, Israel
- International Assoc. of Police Women
- Criminal Division/Executive US Attorney
- NOVA, NCASA, CCAVE, NCTV, NET...
- Federal Bureau of Investigation
- Vice and Police Organizations
- Child Protection Organizations
- United States Air Force Academy, Colorado
- etc.

EXPERT WITNESS: COURT, MILITARY, CIVIC HEARINGS

- Expert Witness: Senate Hearing on "The Science Behind Pornography Addiction"
- Science, Technology and Space Committee, November 18, 2004
- Invited Paper: HR 3300: The Military Honor & Decency Act (Pornography Law) May 1996
- Invited Paper: South Africa Film and Publications Bill of 1995 (Pornography Law) 1995
- Briefed: Selected Lansing Michigan Legislators (Pornography Law) May 1994
- Briefed: Kirkland & Ellis (Re: Oral Argument, United States v. Knox) April 1994
- Briefed: Australian Parliament Standing Committee on Social Issues (Media Effects) 1992, 1994
- Invited Paper: Ontario Human rights Commission (Pornography Effects) 1993
- Invited Paper: Senate Committee on Armed Services (Homosexuality) July 1993
- Briefed: Army Chief of Staff Gordon Sullivan, Senator Malcolm Wallop (Homosexuality in the Military) December 1993
- Invited Paper, Testimony: Presidential Commission on the Assignment of Women in the Armed Forces 1992
- Briefed: Inspector General Roland Griffith (Homosexuality) December 1993
- Expert Research Younger et al., v. Stroh (Federal Court Sex Harassment) 1992
- Testified: Australian Parliament, Senate Select Committee (X & R Rated Effects) April 1992
- Invited Paper: Office of US Surgeon General (Mass Media Harms) March 1992
- Testified: State of Georgia Senate Ed Committee (Kinsey-Sex Ed Curriculum) February 1992
- Testified: Hamilton County Prosecutor's Office: OH (Mapplethorpe Trial) August & October 1990
- Testified: City Council; Newport News, VA (Nude Dancing & Public Order) June 1986
- Invited Paper: US Attorney General Commission on Pornography: NYC (Effects) January 1986
- Testified: US Attorney General Commission on Pornography; Miami (Effects) November 1985

- Invited Paper: US Attorney general Task Force, Domestic Violence: DC (Effects) August 1985
- Testified: Michigan State Senate Juvenile Justice, Corrections: MI (Effects) October 1980

SELECTED GRANTS/POSITIONS

- Bureau of Justice Assistance, US Department of Justice: Grant Reviewer, "Reducing Community Gun Violence" 2002
- Bureau of Justice Assistance, US Department of Justice: Grant Reviewer, Evaluation of Child Protection Proposals, 1991
- HHS: Administrator for Children, Youth, and Families: Grant Reviewer 1991
- Eastern Division Vice Investigators Association: Inservice Trainer 1987-89
- HHS Dept. of Substance Abuse Prevention: Research Paper 1989
- Skaggs Foundation: Visual Literacy Training Grant 1987-89
- Department of Education: "Drug Free Schools" Grant Reviewer 1987
- Department of Education: "Drug Free Videos" Grant Reviewer 1985
- Georgetown Pediatrics Department: Inservice Training Seminars Grand Rounds 1984
- FBI Academy: Erotica/Pornography Effects: Inservice Training Seminar/Video 1983
- OJJDP Missing Children - Serial Murder Task Force: Inservice Trainer 1983-85
- DOJ Office of Juvenile Justice: Principal Investigator, Pornography, Media Research 1983-94
- Israel Science Ministry Department of Sex Education: Kinsey and Inservice trainer, Media 1980-83
- Scholastics Magazine, NYC: Art & Education Writer, Producer 1970-80
- Milwaukee Public Museum: Art/Anthropology Television Writer, Producer 1970s
- Cleveland Museum of Art: Art/Head Start, Education Videos/Captain Kangaroo 1970s
- Los Angeles Skirball Museum: History/Archeology Educational Videos 1966-81
- Captain Kangaroo CBSTV: Segment Producer, Performance Artist 1976-1982

PAST/PRESENT ADVISORY BOARD MEMBER

Science Adviser, California Protective Parents Association
 Science Adviser, Education Task Force, SubCommittee on Science Fraud in the Classroom, for The American Legislative Exchange Council (ALEC)
 Founder, Institute of Media Education and the Family, Israel
 Bereaved Parents Association (Juvenile autoerotic deaths), AZ
 Paul & Lisa, Inc. (Child prostitute rescue organization), CT
 Accuracy in Academia, Washington, D.C.

SELECTED JOURNAL ARTICLES

- *Regent University Law Review* 2002
- *International Journal of Politics, Culture, and Society*, (Netherlands) 1992 (cite)
- *The Journal of Human Sexuality* (Lewis & Stanley) 1996
- *Law & Justice: The Christian Law Review* (UK) 1995
- *Collected Papers from the National Association for Research & Therapy of Homosexuality Conference* (NARTH) July 1995
- *Ethnology and Sociobiology* (USA) 1984

- *New Universities Quarterly: Culture, Education, and Society* (UK) 1981
- *Journal of Educational Thought and Practice in Collective Settlements* (Israel) 1983
- *New York University Review of Law and Social Change* (USA) 1978-79
- *Women Speaking* (UK) July-September 1978
- "A Walk Through the Past," Los Angeles Skirball Museum, (Hebrew Union College) 1974

PAST/PRESENT SELECTED MEMBERSHIPS

- Distinguished Senior Fellow, The Inter-American Institute
- Women in Neuroscience
- The American Statistical Association
- The Society for the Advancement of Sexual Health
- Western Society of Criminology
- National Association of Scholars
- National Council on Family Relations
- American Public Health Association
- The New York Academy of Sciences
- The International Communication Associations
- The National Black Child Development Institute Research
- Council on Ethnopsychology
- The Society for the Scientific Study of Sex
- American Society of Composers, Authors and Publishers
- The World Association of Infant Psychiatry & Allied Disciplines
- American Association for the Advancement of Science
- National Association for Research & Therapy of Homosexuality (Fellow)

MEDIA/PRESS CITATIONS AND APPEARANCES

- *Ted Baehr Movieguide*
- *The American Spectator*
- *The Weekly Standard*
- *Fidelity - The Australian*
- *The London Times*
- *TIME*
- *New Dimensions*
- *The Los Angeles Times*
- *Reader's Digest, April 1997*
- *The Lancet (British Medical Journal)*
- *International German Medical tribune - Science*
- *The Scientist*
- *Archives of Sexual Behavior*
- *The (British Physicians) Quarterly*
- *Newsweek*
- *700 Club, CBN NBC, ABC, CBS, PBS,*
- *The Washington Post*
- *The National Review, May 19, 1997 "Cover Story"*
- *German Arts Television*

- *New Universities Quarterly: Culture, Education, and Society* (UK) 1981
- *Journal of Educational Thought and Practice in Collective Settlements* (Israel) 1983
- *New York University Review of Law and Social Change* (USA) 1978-79
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MEDIA/PRESS CITATIONS AND APPEARANCES

- *Ted Baehr Movieguide*
- *The American Spectator*
- *The Weekly Standard*
- *Fidelity - The Australian*
- *The London Times*
- *TIME*
- *New Dimensions*
- *The Los Angeles Times*
- *Reader's Digest, April 1997*
- *The Lancet (British Medical Journal)*
- *International German Medical tribune - Science*
- *The Scientist*
- *Archives of Sexual Behavior*
- *The (British Physicians) Quarterly*
- *Newsweek*
- *700 Club, CBN NBC, ABC, CBS, PBS,*
- *The Washington Post*
- *The National Review, May 19, 1997 "Cover Story"*
- *German Arts Television*

Description: Dr. Reisman provided expert testimony examining brain science related to pornography addiction and the effects of such addiction on families and communities.

INTERNATIONALLY

THE NETHERLANDS, October 1994: Amsterdam District Court Judge, Mr. U.W. Bentinck, ruled against Playboy's demands for retractions and reparations following Dr. Reisman's appearance in a Dutch public tv broadcast, in which results from Reisman's DOJ study *Images of Children, Crime and Violence in Playboy, Penthouse and Hustler* were discussed.

SOUTH AFRICA, October 2003: The South African Constitutional Court relied upon Dr. Reisman's research on the impact of pornography on brain, mind, memory in its decision to halt legal leeway for the distribution of child pornography in South Africa.

SOUTH AFRICA, 1995: The Office of the Attorney General thanks Dr. Reisman for "your knowledge and your expertise.... your assistance in saving this nation from a potential disaster.... we have achieved a major victory on the pornography front.... which would not have been possible without the aid of your expert knowledge, books, videos and articles." Dr. Reisman's testimony on the ways graphic, antisocial imagery reconfigures brain, mind and memory helped pass **The Film and Publications Bill of 1995**, by an overwhelming majority of 300 votes, prohibiting child pornography in any form (written, visual, cartoon, "artistic" or pseudo), and prohibiting current types of "adult" pornography.

AUSTRALIA, Parliament 1994 and 1992: Following her April 6, 1992 invited testimony and report on pornography and the harm factor to the Senate Select Committee on Community Standards, Parliament banned "X" Rated materials from pay cable TV, while her March 1994 research paper aided Parliament's decision, based on harm, to similarly ban "R" Rated materials from pay cable TV.

CANADA, Supreme Court 1992: Dr. Reisman provided briefing materials on pornography and harm, aiding the Canadian Supreme Court's unanimous decision February 27, 1992 to ban all pornography as "obscene" as it undermines equality by degrading, subjugating and dehumanizing women. Subsequently, in 1993, Dr. Reisman was tasked by the Ontario Human Rights Commission to produce a research paper, "Pornography in Neighborhood Convenience Stores: Neurochemical Effects on Women," for a pornography case challenging the new law-- results pending

NEW ZEALAND, Tribunal 1991 and 1989: Dr. Reisman's research was delivered by-proxy via Dr. John Court to the New Zealand Pornography Commission investigations in 1989. She was again asked for, and delivered, written testimony to the New Zealand Indecency Tribunal in 1991.

ISRAEL, Knesset 1982: Dr. Reisman founded a media monitoring, non-profit foundation in Israel, funded by private and public sources that have presented findings on Israeli media to the Knesset and throughout Israel. At minimum, major corrections and improvements were made in controlling advertisements, largely due to Dr. Reisman's data collection, cadre training, and public dissemination of information.

THE UNITED STATES SUPREME COURT

MASSACHUSETTS, 1989: *Oakes v. Massachusetts*, 491 U.S. 576 (1989). Massachusetts Attorney General, James Shannon cited Dr. Reisman's DOJ, Juvenile Justice and Delinquency Prevention study in this successful brief and in oral appeal to the U.S. Supreme Court. Shannon wrote (1/8/90):

I contacted Dr. Reisman in connection with an important child pornography case, *Massachusetts v. Oakes*...that I argued in the United States Supreme Court in January 1989...I had to convince the court that both nude and sexually explicit photographs of children were exploitive and harmful. To make the point, I quoted Dr. Reisman's study, "Images of Children, Crime and Violence in *Playboy*, *Penthouse*, and *Hustler* Magazines," in which she showed that sexually exploitive photographs of children condone and promote a distorted view of sexuality, often by pairing...sexuality and violence, or depicting children as desiring sexual activity with adults.

OHIO, 1989: *Osborne v. Ohio*, 495 U.S. 103 (1990). Amici cited "Neurochemical Evidence Shows That People React Differently To Pictures Than They Do To Words Raising New First Amendment Considerations" and thanks "Dr. Judith Reisman for her valuable development of this concept" (:23) and, "J. Reisman's New York Review of Law and Social Change," (1979) where she addressed media, science and civil rights.

On behalf of the Amici in *Osborne v. Ohio*.... thanks for your invaluable assistance rendered to us in researching and writing this brief. Your ideas on how the visual images effect people substantially more than the written word is indeed a new concept and could have many significant ramifications in the area of the First Amendment. If in fact the court and legislatures do believe that visual images, specifically of sexual, sexually violent and violent material, will have a greater impact on people in general and children in particular, there may be justification for more strict legislation in these areas than would apply to the written material. Moreover, under a First Amendment analysis, since the harm is greater, there would be more of a compelling state interest to have stricter laws. (H. Robert Showers, 10/12/89).

USA LOWER COURTS

Crawford v. Lungren, 96 F.3d 380 (9th Cir. 1996). The U.S. Court of Appeals for the Ninth Circuit upheld the right of California's news rack laws to protect minors in support of Amici

arguments by the National Law Center for Children and Families. Amici cited to Reisman's Canadian paper, "Pornography in Neighborhood Convenience Stores: Neurochemical Effects on Women," that "Images reach the brain more quickly than print" (:15).

Steffan v. Cheney, 780 F.Supp. 1 (D.D.C. 1991), *aff'd by Steffan v. Perry*, 41 F.3d 677 (D.C. Cir. 1994). The U.S. States Court of Appeals for the District of Columbia Circuit. The lower court in 1991, under Judge Oliver Gash, cited Reisman's book in rejecting Steffan's military reinstatement. To answer Steffan's appeal, in 1994, Colonel Ronald Ray Esq., Ret., and Reisman filed an Amicus brief on behalf of the Naval Aviation Foundation in support of the Department of Defense ruling, that homosexuality and sexual conduct are inseparable. General P.X. Kelley, former member of the Joint Chiefs of Staff, and Commandant of The Marine Corps, wrote Reisman's "groundbreaking work in *Kinsey, Sex & Fraud*," (October 5, 1994) was needed in the Steffan case. We won.

United States v. Knox, 32 F.3d 733 (3d Cir. 1994). The U.S. Court of Appeals for the Third District, ruled in support of arguments presented in the Institute for Media Education Amicus and Arnold & Porter written with Colonel Ron Ray and Randall Shaheen, citing Reisman's research on images and for OJJDP, to protect children from use in child pornography.

TEXAS, 1993: Despite obstructions, the Court's successful use of Dr. Reisman's findings continues. A Texas prosecutor wrote the following:

As a prosecuting attorney, I have tried approximately 35 obscenity jury trials in which the defense has called a sociologist as an expert witness on community standards. Your book, *Kinsey, Sex and Fraud*, has proven invaluable on cross-examination. This sociologist studied at the Kinsey Institute and bases a lot of expert opinions on his studies at that institute. To be able to point out to the jury the fraud that Alfred Kinsey and his institute have perpetrated is a very effective tool... I encourage you to continue your work in this area to point out to the public the frauds sociology and psychology have given us (March 8, 1993).

Ohio v. Contemporary Arts Center, 735 F. Supp. 743 (S.D. Ohio 1990) *Mapplethorpe art trial: obscenity*. Judge of the Hamilton County Municipal Court entered upon the premises of CAC and videotaped each photograph on display. The presiding judge rules in agreement with Dr. Reisman's expert testimony re: what was Mapplethorpe's artistic "whole" to be viewed by the jury. Judge David J. Albanese cites directly from Reisman's definition of what "an image" is and how the image works on viewers.

"The Court finds that each photograph has a separate identity; each photograph has a visual and unique image permanently recorded."

-- *The Washington Post*, September 7, 1990, p. B5

Frank Prouty, the State prosecutor writes: As you know, the State filed a Motion in Limine regarding what constituted the "whole" as that issue related to the Mapplethorpe exhibit. Your testimony was critical to the Motion, and your testimony ensured a favorable ruling for the State... The issues and interpretation you presented concerning the child photographs and the remaining photographs substantiated the prosecution's view... The perspective you established was both concise and persuasive, and should be considered in any interpretation of pornography and its affect in both children and adults (March 4, 1991).

CALIFORNIA, 1989: Ventura County Superior Court cites Reisman's research to convict child pornography *Hustler* cartoonist, Dwaine Tinsley. Mr. Hardy indicated that your report [Dr. Reisman's "Images of Children, Crime and Violence"] was extremely helpful throughout the prosecution of the Tinsley case. Mr. Hardy used the report as a reference source for putting together his closing arguments, and for his cross examination... Mr. Hardy considers your report to be a great piece of work, and has recommended the report ... to the National Association of District Attorneys ... your report ... was a great help in the prosecution of this case (March 28, 1989).

Dr. Reisman has been successfully consulted on sexual harassment in the Minnesota workplace; on a mother's rights to child custody from an AIDS father in Kentucky; in testimony before the Attorney General's Commission on pornography; on homosexual versus parents rights in a Connecticut classroom on fraudulent sex education in Falmouth schools. She is currently consultant for a first amendment versus parental rights case involving one government school, in a second school versus parents' case involving subversion of parents to provide contraception to minors and a third case involving sexual harassment in the workplace.

LEGISLATION

WASHINGTON, D.C., December 1995: H.R. 2749, The Child Protection and Ethics in Education Act, is introduced. A Bill to determine if Alfred Kinsey's *Sexual Behavior in the Human Male* and/or *Sexual Behavior in the Human Female* are the result of any fraud or criminal wrongdoing: 41 co-sponsors; carried over to 1997-1998 legislature to investigate the Kinsey data. This Bill is the culmination of Dr. Reisman's 20-years of research and advocacy for children. A Senate hearing waits in the wings.

MINNESOTA, 1993: After a last-minute briefing and presentation of pedophile exhibits by Dr. Reisman to Minnesota legislators, "affectional orientation" language, which allows children to be in legal sexual relationships with adults, is removed from two pending Minnesota laws.

GEORGIA, 1992: Heeding Dr. Reisman's exhibits and expert testimony on February 13, 1992, the State of Georgia House Education Subcommittee terminates Georgia's then mandated sex education curriculum due to its false, Kinseyan database. The educator who organized the legislative event credits Reisman's data, additionally, with the overwhelming legislative defeat of

the homosexual/sex education lobby, by a house vote of 150-1 and a Senate vote of 48-6. The legislature prohibits teaching youths illegal behavior such as sodomy, adultery, and fornication. (C. Weatherly, Education Analysis & Research Systems, June 11, 1992).

WASHINGTON, D.C., 1991: Congressman William E. Danneymeyer cites Dr. Reisman's Kinsey fraud findings in a floor debate, which helped sway cancellation of a proposed \$18 million dollar teen-sex survey (TIME, August 5, 1991: 27), viewed by the national sex-education monopoly as a major defeat in their efforts to modify American youth.

VIRGINIA, 1986: Dr. Peter Anderson wrote: "The City Council voted 7-0 in favor of banning topless dancing ... due to Dr. Reisman's knowledge of the material and her ability to present it in such a clear and concise manner. I encourage anyone to have Dr. Reisman address either their citizens or community leaders if they need help in fighting pornography in the local community". (June 1986).

MICHIGAN, circa 1980: Testimony to the Michigan State Senate Juvenile Justice Corrections, to aid decision-making on pornography harms.

MISCELLANEOUS USA

ILLINOIS, 1994: As an expert on "Cultural Diversity," Dr. Reisman's presentation of evidence, citing to the use of Kinsey's findings in the planned curriculum, successfully aided parents in eliminating a \$600,000 mandated Diversity program in Springfield, Illinois schools.

MISSOURI, 1988: Missouri Department of Corrections. A Corrections psychologist writes that a group formed to study eliminating Playboy, Penthouse, and Hustler, and all other pornography from the prison system. A call to Missouri corrections finds all pornography but Playboy banned. "Two males within the administrative structure, who reportedly saw no problem with pornography within our system, were greatly swayed in favor of its removal once they read your report... [One] often attempted to sway policy toward allowing pornography to pacify inmates. He now is a member of our committee to halt and ban incoming pornography. Yours was the only report he read." (10/26/88)

COVER STORY in *The National Review*, MAY 19, 1997 "Mortal Sins": "The sexual revolution was based on a lie. Judith Reisman has spent thirty years uncovering the truth," by Tom Bethell [and] featured in the Reader's Digest, (4/97), "Sex, Lies and the Kinsey Report."

Comments on Dr. Reisman and her work

Dr. Reisman's scholarly findings have had international legislative and scientific import in the United States, Israel, South Africa, Canada and Australia, while *The German Medical Tribune* and the British medical journal, *The Lancet* demanded that the Kinsey Institute be investigated, saying:

The Kinsey reports (one in 1948 on males and the companion five years later) claimed that sexual activity began much earlier in life.... and displayed less horror of age differences and same-sex relationships than anyone at the time imagined. It was as if, to follow Mr. Porter again, "Anything goes". In **Kinsey, Sex and Fraud, Dr. Judith A. Reisman and her colleagues demolish the foundations of the two reports ...** Kinsey et al ... questioned an unrepresentative proportion of prison inmates and sex offenders in a survey of "normal" sexual behavior. Presumably some at least of those offenders were also the sources of information on stimulation to orgasm in young children that can only have come from pedophiles--or so it must be hoped. Kinsey.... has left his former co-workers some explaining to do. *The Lancet*, (Vol. 337: March 2, 1991, p. 547).

Dr. Laura J. Lederer, as Sr Advisor on Trafficking, Office for Global Affairs, U.S. Department of State: "Dr. Judith Reisman [is] one of the world's most brilliant theorists on child sexual exploitation." In the 1980s, Dr. Reisman conducted the first and largest content analysis of *Playboy*, *Penthouse*, and *Hustler* and exposed the child pornography images in them. She has also done groundbreaking work on Albert Kinsey, proving that [his team] performed sexual experiments on children and infants, and calling into question his entire body of work, a body of work that some claim began the so-called sexual revolution. **In some ways she is the fore-mother of today's anti-trafficking work."**

Cmdr. Vernon J. Geberth, M.S., M.P.S. author of *Sex-Related Homicide and Death Investigation: Practical and Clinical Perspectives* and *Practical Homicide Investigation: Tactics, Procedures, and Forensic Techniques*: "Dr. Judith Reisman's book *Sexual Sabotage* is a bright beacon of light and truth shining through a world permeated with the smog of Kinsey generated pathological sexual behavior. *Sexual Sabotage* is a very well-researched book establishing how the morals and religious legacy of Judeo-Christianity were hijacked by the pseudo science of Alfred Kinsey, who spawned a sex science cult to normalize his own sexual perversions." Dr. Reisman co-authored Chapter One, "Human Sexuality and Sexual Deviance: Research and Reality" for the Second Edition of Geberth's foundational work, *Sex-Related Homicide and Death Investigation*.

J. Robert Flores, Esq., Former Administrator, Office of Juvenile Justice and Delinquency Prevention, United States Department of Justice: "Judith Reisman has had the courage as a researcher to do the most important thing, keep an open mind and allow the data and the research

to influence and guide her work. Her work shines an important light on topics that seem to receive attention from only one direction in the academic community. Policy makers, foundations, and research institutions should carefully consider the issues she raises so that social re-engineering and personal agendas are not funded in the future and given the shine that comes from being associated with major donors, institutions, and foundations."

Lt. Col. Dave Grossman, author of *On Killing and On Combat*: "Dr. Judith Reisman is a national treasure. Her latest book, *Sexual Sabotage*, strikes a blow and sounds the clarion call for a return to decency and goodness in our civilization. With important new information, and incisive writing and logic, she expands and expounds on her past work to identify the full spectrum of "a treasonous moneyed cult of sexual deviants" who led us down the path to decay and destruction. And she charts a course for us to cast off the sexual tyranny and perversion of a "closeted clan of impotent, sexual psychopaths" to return from the dark and tragic place to which we have traveled, and to regain a culture of virtue, decency and honor."

Shelley Lubben, B.Th., Executive Director, Pink Cross Foundation: "Dr. Reisman's extraordinary work taught me how and why I was trafficked in prostitution and pornography, and Jesus Christ showed me the way out and how to help others find that same freedom."

Connie Valentine, M.S., Policy Director, California Protective Parents Association: "As Scientific Advisor for California Protective Parents Association, the presentation of Dr. Judith Reisman's Kinsey and Playboy research has enabled CPPA to win hearts, minds and votes in legislative and family court battles. The historical data in *Sexual Sabotage* tracking down our current pedophile, child pornography, and child sex trafficking pandemic should be known by all; in academe, law enforcement, legislators and the general public. We at the CPPA expect that *Sexual Sabotage* will be the impetus for a federal investigation of the Kinsey crimes."

Donna M. Hughes, PhD, Professor, University of Rhode Island: "Judith Reisman is the most fearless scholar I know. For decades, she has relentlessly researched the history of research and ideas on sexuality. She has documented the unsavory political motivations behind the most respected academics of their time. Her scholarship shows us the root of much of the sexual violence and sex trafficking we see today."

MOVIEGUIDE Founder, Ted Baehr, Esq., PhD.: "Whatever you do, please read everything Judith Reisman, PhD writes. She offers the diagnosis and the cure to the rampant sexual illness that is consuming our culture. She has exposed the vile source of the cultural disease and in doing so has set forth the remedy. There is no one more important to read. Her new book *Sexual Sabotage* is highly recommended."

Matthew Barber, Associate Dean for the Center for Career and Professional Development at Liberty University School of Law: "Dr. Reisman has been a lifelong champion for women

and children. She has done more to expose the crimes and frauds perpetuated by Alfred Kinsey than anyone else. She is to be commended for her life's work."

Bruce A. Taylor, President & Chief Counsel, National Law Center for Children and Families: "We should probably call her Detective Reisman for finding the hidden clue to Kinsey's crimes against children and families. She alone noticed that babies were molested in the name of Kinsey's macabre science and her book is the victims' grand jury indictment of perhaps the most destructive sexual revolutionary since Caligula. Kinsey, Crimes & Consequences is a blueprint for justice for victims of sexual exploitation and abuse. In the face of Kinsey's handbook for perpetrators, Dr. Reisman is the victims' amicus curiae." (April, 2000)

John L. Harmer, ESQ, Former California GOP Whip and Lieutenant Governor under Ronald Reagan: "There is no one in the entire world, let alone the United States, better qualified to present this essential message than Dr. Judith Reisman. If this book does not awaken the people of America to the reality that this is an issue of national survival, then our fate will be terrible. I appeal to all who are concerned for the safety of their family, their community, and their nation to not just read this book, but to study this book."

Tim Tate, Amnesty International Award-winning Producer-Director of "Kinsey's Paedophiles," Yorkshire TV, Great Britain: "When I first came across Judith Reisman's work my view of Alfred Kinsey was unquestioningly benign... In the course of producing my documentary - 'Kinsey's Paedophiles' - it became clear that every substantive allegation Reisman made was not only true but thoroughly sourced with documentary evidence - despite the Kinsey Institute's reluctance to open its files. My film built on the foundations laid by Dr. Reisman. Those foundations - and the additional evidence we uncovered about Kinsey's involvement with paedophiles who were actively abusing children - make it imperative that his successors at the Kinsey Institute today allow a rigorous and independent investigation of this dark corner of human study." (April, 2000)

Robert Sweet, former U.S. Depart. of Juvenile Justice and Delinquency Prevention Administrator: "Dr. Reisman is a scientist of outstanding exactitude and courage...the massive, affluent sex industry [has been unable] to show her findings to be incorrect or methodologically flawed--in even the smallest detail" (August 25, 1994)

Bill Moyers, CBS News: "Dear Professor Reisman: Having read your article in the Washington Post, I wanted to say that I, for one, believe your research project to be quite important. Our society faces no more important dilemma, in fact, and I say this as a father, journalist and citizen. In my role as a journalist, however, I would like to.... explore how your conclusions can be reported on the air in a responsible way" (June 19, 1985)

Hon. Dr. Marlene Goldsmith, M.L.C. Legislative Council, Australia: "Thank you for your powerful presentation on Tuesday. There were at least seven Members of Parliament present,

and I have had very favorable responses from most of them.... For those of us fighting this battle in the trenches, your visit has been an inspiration. Thank you for all you are doing to make the world a safer place for its children" (November 16, 1992)

The Hon. Dennis Stevenson MLA, Australia: "[Thanks].... in Canberra during your recent Australian tour.... for the in-depth briefing that you gave Parliamentarians.... [and] your presentation to the National Press Club Luncheon.... Parliamentarians.... were surprised to learn that Kinsey's findings have misled many legislators.... [as so much about] human sexuality in the western world derives from Kinsey" (December 11, 1992)

John Rabun, Deputy Director, Nat. Center for Missing & Exploited Children: Reisman's "study must be read by all those concerned with the ways pornography and violence in the media affect the incidence of child sexual exploitation and abuse" (3/24/88).

Dr. Laura Schlessinger: "Dr. Reisman has produced a scholarly and devastating study revealing the ugly and frighteningly dangerous pseudo-scientific assault on our children's innocence." (2003)

Susan Trento, Investigative Reporter, Author of *The Power House*: exposed *Playboy's* buying of legislative influence in Washington D.C. to discredit Reisman, whose cataloging of "children, crime and violence in pictures and cartoons found in *Playboy*, *Penthouse*, and *Hustler*...made the publishers of these and other magazines very nervous" (1992:194)

The LA Times: Reisman, "delivers a potentially damaging blow...comparing] two [Mapplethorpe] photographs...to child pornography and [saying] none are fit to hang in an art museum." (10/5/90) In 1991, *Playboy*, (whispering counsel to the Mapplethorpe defense) reported: "I would have taken a .357 Magnum, walked up to her and said, 'Judith, you're history'" (2/91). Hugh Hefner pens a "letter to the editor" in Canada, 1996, to condemn Reisman's work. *Playboy*: "Reisman...is lying with statistics...*Playboy* never has, never will" sexualize children. (12/85). She "puts men's magazines on the endangered species list," (10/88)...is "propagating a new witch-hunt mentality." (2/89)

Tim Philpot, Lawyer/Kentucky Congressman: "We retained the services of Judith Reisman as an expert witness on the issue of the health, welfare and safety of the four minor children.... Dr. Reisman's testimony was extremely helpful.... on the behavioral issues relating to the potential abuse of the children by either the father or his friends" (September 5, 1996)

Pamela Hobbs: "My father, Dr. A. H. Hobbs.... believed your research was excellent." -- University of Pennsylvania sociologist and philosopher, Dr. Albert Hobbs, provided the scholarship that led the Rockefeller Foundation to abandon Kinsey's grant funds, instead funding the American Law Institute to *implement* Kinsey's fraudulent sex data into The Model Penal Code in order to eliminate or reduce most sex crime penalties. (September 25, 1994)

Law Enforcement Training Conference on Child Sexual Exploitation and Obscenity, Memphis, Tennessee, on Dr. Reisman as Guest speaker particularly enjoyed the views of Dr. Judith Reisman and wished she had been able to spend more time with us. Her comments were right on target ... This seminar changed my total outlook/viewpoint on these type cases. Dr. Reisman could start a revolution. She's great ... I would have liked to have heard her speak more. She turned some lights on in my mind. (10/4-5, 1993)

Jerre Thompson, President of Southland 7-11 Corp., Letter to the Attorney General's Commission on Pornography: [It] became apparent to us--especially from the generally unrebutted testimony before your Commission-- that respected experts who have studied this issue very carefully are of the opinion that apparently a very small segment of our society employs various tools, including adult magazines, to assist in abuses of children and others. This was strongly pointed out in Judith Reisman's report before the Commission at its [Miami, Florida] hearing on child pornography. (April 10, 1986)

Sam Houston State University Criminal Justice Center, Texas, announced: "Local Professional Named to Missing Children-Serial Murderer Task Force: Judith A. Reisman, Professor at American University in Washington, D.C., has been named to a National task force (funded by two agencies of the U.S. Department of Justice), given the job of developing the master plan for a nationwide system to trace missing or abducted children and adults, serial murderers and conduct research.... the other (session is) at the FBI Academy, Quantico." (August 15, 1983)

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Partner solicitation language as a reflection of male sexual orientation

By Judith A. Reisman, Ph.D. & Charles B. Johnson, Ph.D. The Institute for Media Education

Sexual Exploitation by Health Professionals in Cartoons of a [Playboy] Popular Magazine

By Judith A. Reisman, Deborah F. Reisman, and Barry S. Elman

Sexual Exploitation of Patients by Health Professionals

Edited by Ann W. Burgess, R.N., D.N.Sc., and Carol R. Hartman, R.N., D.N.Sc.

Beverly LaHaye Responds to "Answers" from Dr. John Bancroft, Director of the Kinsey Institute

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By Judith Reisman
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*"AMERICA'S CHILDREN: KEY NATIONAL INDICATORS OF WELL-BEING, 2003,"
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A Work in Progress

J.A. REISMAN, PH.D.

THE INSTITUTE FOR MEDIA EDUCATION

&

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By Judith Reisman
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Groomed for Sodomy: What's Taught to Young Students Today Used to Be Illegal

By Judith Reisman
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By Judith Reisman
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It's Academic: Kinsey's Love Affair with Pedophilia Three Generations Later

By Judith Reisman
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'Gay' gypsy moths and porn addiction: Exclusive: Judith Reisman covers latest science on pheromones, mating confusion

By Judith Reisman
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By Judith Reisman

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Exclusive: Judith Reisman challenges Obama for urging teens to embrace homosexuality

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Exclusive: Judith Reisman shows link between Playboy, children, glorification of drugs

By Judith Reisman

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Kinsey minions continue child sex abuse

Exclusive: Judith Reisman exposes horrific 'scientific' studies of kids' sexuality

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Muslim female slavery and porn in Baghdad

Exclusive: Judith Reisman spotlights how rise of smut further degrades Arab women

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By Judith Reisman

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By Judith Reisman, PhD

(source: News Blaze)

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Sexual Exploitation by Health Professionals in Cartoons of a [Playboy] Popular Magazine

Judith A. Reisman, Deborah F. Reisman, and Barry S. Elman

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Edited by Ann W. Burgess, R.N., D.N.Sc., and Carol R. Hartman, R.N., D.N.Sc.

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Judith A. Reisman, PhD, Former Principal Investigator, Images of

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1989, US Dpt of Justice, Juvenile Justice and Delinquency

Pornography, Rape & Murder Sample

How the FBI and DOJ Minimize Child Sex Abuse Reporting

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Judith Reisman, Ph.D.

The Institute for Media Education

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Exclusive: Judith Reisman notes irony of new U.K. rule restricting 'escort' ads

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"Openly Gay" Australian High Court Judge Thanks Kinsey

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By Dr. Judith Reisman
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'Free love' '60s? Not quite

By Judith Reisman

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