

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FREE SPEECH COALITION, INC., <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	
)	No. 1:24-cv-00980-RLY-MG
TODD ROKITA, in his official capacity as the)	
Attorney General of the State of Indiana,)	
)	
Defendant.)	

DEFENDANT’S PRELIMINARY WITNESS AND EXHIBIT LIST

Pursuant to the Case Management Plan (ECF No.62), Defendants Todd Rokita, in his official capacity as the Attorney General of the State of Indiana, submits his preliminary witness and exhibit list.

I. PRELIMINARY WITNESS LIST

1. Peter J. Glogoza, Captain with the Indiana State Police, who can be contacted through defendant’s counsel.
2. Bryan R. Brown, Detective with the Evansville Police Department’s Internet Crimes Against Children Unit, who can be contacted through defendant’s counsel.
3. Tony Allen, Founder and Executive Director of the Age Check Certification Scheme, who can be contracted through defendant’s counsel.

II. PRELIMINARY EXHIBIT LIST

1. All filings by Plaintiffs or Defendant in this matter and any attachments or exhibits, including, but not limited to, the parties’ briefing on Plaintiff’s Motion for Preliminary Injunction.

2. The complaint and answer to the complaint in this case.
3. All declarations and verified documents filed or served in this case.
4. Studies, scholarship, data, and other documents related to access to sexually explicit content online and the prevention of such access by minors, including, but not limited to, the means of age verification, content filtering, internet services provider blocking, and other alternatives.
5. Studies, scholarship, data, and other documents related to data collection, security, and privacy.
6. All depositions taken in this action and their exhibits.
7. All responses to interrogatories and documents produced in discovery in this action.
8. All stipulations and responses to requests for admission in this action.
9. Public reports prepared by any governmental agency related to access to sexually explicit content online, and the prevention of such access by minors, including, but not limited to, the means of age verification, content filtering, internet service provider blocking, and other alternatives.
10. All documents noted by Plaintiffs in their disclosures and any exhibit lists.
11. Any and all documents necessary for purposes of impeachment or rebuttal.
12. The following articles:
 - i. Byrin Romney, *Screens, Teens, and Porn Scenes: Legislative Approaches to Protecting Youth from Exposure to Pornography*, 45 VT. L. REV. 43 (2020).

- ii. Niki Fritz, et al., *A Descriptive Analysis of the Types, Targets, and Relative Frequency of Aggression in Mainstream Pornography*, 49 ARCH. OF SEXUAL BEHAVIOR 3041 (July 2020).
- iii. Aina M. Gasso, et al., *Psychological and Forensic Challenges Regarding Youth Consumption of Pornography: A Narrative Review*, ADOLESCENTS, 108–22 (Apr. 7, 2021).
- iv. Chiara Sabina, et al., *The Nature and Dynamics of Internet Pornography Exposure for Youth*, 11 CYBER PSYCHOLOGY & BEHAVIOR, no. 6, 1–3 (2008).
- v. Ashley Belanger, *Pornhub prepares to block five more states rather than check IDs*, ARSTECHNICA (June 20, 2024), available at <https://bit.ly/4cdUUJu>.
- vi. Jacob Kastrenakes, *Pornhub to block five more states over age verification laws*, THE VERGE (June 19, 2024), available at <https://bit.ly/3xvAI6E>.
- vii. Andrew K. Przybylski and Victoria Nash, *Internet Filtering and Adolescent Exposure to Online Sexual Material*, 21 CYBERPSYCHOLOGY, BEHAVIOR, AND SOCIAL NETWORKING, no. 7, 405–10 (2018).

Plaintiff will be notified of any additional witnesses and documents in a timely fashion as those documents become known, as investigation and discovery are ongoing.

Respectfully submitted,

THEODORE E. ROKITA
Indiana Attorney General

By: /s/ James A. Barta
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CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2024, a copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

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