May 18, 2021

Dear Chairwoman Maloney and Ranking Member Comer; Chairman Ossoff and Ranking Member Johnson; Chairman Nadler and Ranking Member Jordan; Chairman Durbin and Ranking Member Grassley; Chairman Thompson and Ranking Member Katko; Chairman Peters and Ranking Member Portman:

We are compelled to write to all of you because grave crimes are being committed across the nation with, it appears, total impunity. Together, your committees have oversight over U.S. federal law enforcement including the Federal Bureau of Investigations (FBI). Only you have the power to discover why the sexual assault of women and children, child sexual abuse material (also known as child pornography), and non-consensual intimate images are being uploaded and distributed on internet platforms. This is occurring with no apparent legal consequences to individual perpetrators or the digital facilitators of monetized sexual abuse (which constitutes human trafficking) as well as criminal sexual violence, and gross violations of privacy rights.

In a virtual congressional briefing¹ on April 8, 2021, sponsored by 12 leading anti-trafficking organizations,² victims and survivors described their powerlessness to remove documentation of crimes committed against them. One was a federally certified adult victim of labor and sex trafficking who has received no assistance to delete pornographic images still circulating on the internet, years after she was freed from an illegal massage brothel. Another was a 20-year-old survivor who begged Pornhub to delete intimate pictures of her made when she was age 14 all to

²Breaking Free (MN); Coalition Against Trafficking in Women International (CATW); Mentari Survivor Empowerment, Inc. (NY); More Too Life (FL); National Center on Sexual Exploitation (NCOSE); Organization of Prostitution Survivors (OPS, WA); Rights4Girls (DC); SPACE International-US branch; Survivors for Solutions; Traffickinghub Movement; United Against Slavery (TN); and author Christine Stark
no avail. The experience led her to drop out of school, develop drug addiction, and become homeless. She continues to suffer complex trauma and rarely leaves her home.

MindGeek, which owns Pornhub and at least 160 other hardcore pornography websites, serves as a case study of corporate indifference regarding harm caused to women and children on its platform. It has received widespread international condemnation for facilitating and profiting from criminal acts including sex trafficking, filmed sexual abuse of children, and non-consensually recorded and distributed pornography.³

Based on the presented evidence,⁴ including testimony of victims and MindGeek executives before the Canadian Standing Committee on Access to Information, Privacy and Ethics, it is clear that MindGeek has violated federal sex trafficking and child protection laws, particularly child pornography distribution and reporting laws.⁵ For example, MindGeek executives stated in the Canadian hearing that their company reviews each video before it is publicly posted⁶ thus, supporting the contention that they knowingly and willfully distributed child sexual abuse materials which are present on their sites. Since MindGeek monetized the child sexual abuse materials, these admissions also show that they knowingly facilitated and benefited from sex trafficking of minors.⁷

Additionally, because MindGeek intentionally placed a download button on every video distributed on Pornhub until December 2020, after being exposed by the New York Times, the company has violated federal age verification and record keeping laws under 18 USC Section 2257 for over a decade. This is because the download button caused the direct transfer of pornography from MindGeek servers to individuals’ devices around the globe.

MindGeek and other pornography websites using a similar business model must be held accountable. It is urgent that Congress demand that law enforcement agencies investigate MindGeek as the pace setter in what amounts to a massive criminal enterprise. Anything less than full legal accountability is an injustice to victims whose lives have been damaged as a result of MindGeek’s knowing and willful actions. Moreover, in actions that may also be consumer fraud, MindGeek has admitted to enabling U.S. citizens to violate federal child pornography possession laws by encouraging the download and possession of images of child sexual abuse (i.e., child pornography).⁸

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⁶ Statement of Feras Antoon, “Because every single piece of content is viewed by our human moderators,” before the House of Commons Canada, “Meeting No. 19 ETI,” (time marker 00:11:27), ibid.

⁷ See also statement of David Tassillo, “It- it- it is possible that people committing crimes are able to circumvent our systems,” before the House of Commons Canada, “Meeting No. 19 ETI,” (time marker 01:33:19), ibid.

⁸ Statement of Serena Fleites, “. . . it had already been basically downloaded by people all across the world. It would always be uploaded, over and over and over again. No matter how many times I got it taken down, it would be right back up again,” before the House of Commons Canada, “Meeting No. 18 ETI,” (time marker 1:36:53), ibid.
By its failure to implement age verification during pornography content uploads and pornography consumption, MindGeek has facilitated harms against massive numbers of children, both in front of the screen—through exposing children to pornography—and behind the screen—by facilitating images and films of child sexual abuse. It has also caused extensive harm to women who never agreed to have intimate material recorded or uploaded and distributed worldwide—resulting in immense profit to the company, which sells premium subscriptions, sells advertisements, harvests massive user data, and owns multiple related businesses. Based on MindGeek’s testimony and its longstanding business practices, it is clear to us that MindGeek cannot be trusted to self-regulate. Yet this is what lack of enforcement and regulation has permitted.

A central role of government in a just society is to protect its most vulnerable. In this spirit, we call on Congress to use your authority to demand the Department of Justice and FBI conduct a full criminal investigation into MindGeek, and to hold its leadership accountable to the fullest extent of the law.

Please use your authority to protect vulnerable and victimized adults and children from this predatory and unethical corporation, a firm that exemplifies the depth and breadth of criminality when law enforcement fails to police digital space.

Signed,

132 Survivors of Sexual Exploitation and 630 NGOs

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<th>Role/Position</th>
<th>Location</th>
<th>Country</th>
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<tbody>
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<td>Chair, Nordic Model Now!</td>
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<tr>
<td>Sasha Rakoff</td>
<td>CEO, Not Buying It</td>
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<tr>
<td>Ruth Greenberg</td>
<td>Activist, Radfem Collective</td>
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<tr>
<td>Joy Andrew</td>
<td>Development Manager, Restore Glasgow</td>
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<td>Darryl Mead</td>
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<td>Neil Fairbrother</td>
<td>Journalist, The Safetonet Foundation</td>
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<td>John Carr</td>
<td>Secretary, UK Children's Charities' Coalition on Internet Safety</td>
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<td>Elizabeth Dalgarno</td>
<td>Lecturer, University Of Manchester</td>
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<td>Chris Green</td>
<td>President, White Ribbon UK</td>
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<td>Lynda Dearlove</td>
<td>CEO, Women@Thewell</td>
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<td>Gh - Ghana</td>
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<td>Ndonwie Peter</td>
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<td>GR - Greece</td>
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<td>Allison Fowler</td>
<td>Caregiver, Community House, Damaris/Threads Of Hope Hellas</td>
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Porn Addiction Counselor

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Joshua Hk  
Overseer, Northmead Assembly of God

Kayula Leda  
Counter Trafficking Activist, Sisters of Charity

ANONYMOUS LOCATION

Prisma Gorn  
Survivor of Sexual Exploitation

Helen Hughes  
Survivor of Sexual Exploitation

Joyclyn Bell  
Survivor of Sexual Exploitation

Dianne Post  
Attorney, Lavendar Patch