

---

# **NOT A FANTASY:**

*How the Pornography Industry Exploits  
Image-based Sexual Abuse in Real Life*



## National Center on Sexual Exploitation

The National Center on Sexual Exploitation (NCOSE) is the leading organization preventing sexual abuse and exploitation at mass scale by eliminating institutional practices and societal norms that perpetuate these harms. As leading experts in combating sexual exploitation, NCOSE is uniquely positioned to assist in the critical endeavor of combating image-based sexual abuse. Our decades of experience, combined with extensive research, direct engagement with survivors, and advocacy with tech giants equips us with a profound understanding of the impacts—both positive and negative—of technology on sexual abuse and exploitation.

### Recommended citation:

Lisa Thompson, Victoria Rousay, Haley McNamara, Lily Moric, Marcel van der Watt, and Eleanor Gaetan, *Not a Fantasy: How the Pornography Industry Exploits Image-based Sexual Abuse in Real Life* (Washington, DC: National Center on Sexual Exploitation, 2025).

**Document design:** Cassidy Collins.

We wish to express our gratitude to The Reward Foundation ([rewardfoundation.org](https://rewardfoundation.org)) for their assistance with Similarweb data.

**Part I: Executive Summary ..... 4**

**Part II: Introduction ..... 5**

**Part III: What is Image-based Sexual Abuse (IBSA) ..... 6**

**Part IV: Forms of IBSA Common in Mainstream Pornography ..... 7**

Nonconsensual Distribution of Sexually Explicit Material ..... 7  
Recorded Sexual Violence ..... 7  
Computer-Generated IBSA ..... 7  
Video Voyeurism ..... 8

**Part V: Not a Fantasy, Harm in Real Life—Examples of IBSA  
on Mainstream Pornography Websites ..... 9**

**Part VI: Traumatic Impact of IBSA on Those Victimized ..... 13**

**Part VII: Defining the Pornography Industry ..... 14**

What Do We Mean by “Pornography Industry” ..... 14  
Power and Influence within the Pornography Industry ..... 16

**Part VIII: How the Pornography Industry Fuels IBSA ..... 18**

Nine Ways the Pornography Industry Fuels Image-based Sexual Abuse  
Pornography Industry Culpability for the Exponential Rise of IBSA ..... 18

1. Sexual Socialization of Pornography Users to IBSA ..... 19  
    The Pornography Industry’s Normalization of IBSA ..... 20  
    The Pornography Industry Actively Shapes the Sexual Appetite for IBSA..... 29  
2. Industry Profiteering—the “Free” Pornography Profit Model ..... 31  
3. Disregard for Existing Law Regarding Age and Identity Verification ..... 33  
4. Anonymous User Uploads and Lack of Robust Content Moderation ..... 35  
5. Mass Publicization and Global Trafficking of IBSA ..... 40  
6. Facilitation of Serial Sexual Abuse and Exploitation ..... 40  
7. Failure to Protect Performers from Pirating of Content ..... 42  
8. Exploitation of AI and Normalization of Forged Pornography ..... 46  
9. Lack of Meaningful Survivor-support Services and Failure to Permanently Remove IBSA ..... 52  
    The Pornography Industry and Sex Trafficking ..... 53

**Part IX: How to Stop Image-based Sexual Abuse and Create  
Accountability for Its Creators, Online Distributors, and Profiteers ..... 56**

**Part X: Endnotes ..... 57**



## Part I | Executive Summary

At the apex of the global pornography industry stands a small number of corporations which, since the 2000s, have used the Internet to aggregate and distribute pornography across the planet. These titans of the pornography industry—Pornhub, XVideos, XNXX, and XHamster—built their empires, in no small part, by exploiting the rights, bodies, and images of countless individuals, with image-based sexual abuse (IBSA) as one of the most horrifying components of their business model. Utilizing a “freemium” marketing strategy that both spurred and depended on the nonconsensual distribution of sexually explicit material by uploads from anonymous third parties, the tube site-type distributors of Internet pornography ascended to the pinnacle of pornography industry.

**Image-based sexual abuse is a violation of persons that includes the theft, creation, and distribution of sexually explicit material without the meaningful consent of the person/s depicted, or the manipulation of nonexplicit material for the purpose of making it pornographic.** It takes several forms, including any nonconsensual distribution of 1) sexually explicit images or videos, 2) recorded sexual violence, 3) video voyeurism, as well as 4) nonconsensual creation or distribution of AI-generated forged pornography.

Catalyzed by anonymity, malice, and/or misogyny, as well as other factors, individual perpetrators of image-based sexual abuse seek to rob those they victimize of their dignity, autonomy, and safety. Most discussions on the issue of image-based sexual abuse stop here, focusing largely on the bad actions of individual perpetrators (who are overwhelmingly men).

This report takes a wider view, exploring the role of corporations—specifically Internet pornography tube sites—in fueling the wave of image-based sexual abuse that has swept the globe.

Driven by technological savvy, greed, hubris, and callous disregard for the wellbeing of others, the owners and operators of Internet pornography tube sites leveraged image-based sexual abuse material for profit. Their dramatic success in this endeavor reshaped the pornography industry, transforming pornography tube sites into the modern oligopoly of sexual exploitation they are today.

The consequences of their grotesque and irresponsible actions will likely endure for generations, as the image-based sexual abuse themes and materials these sites traffic socialize millions, if not billions, of their users to view these forms of sexual abuse as “normal.”

Amid inconsistent content moderation, minimal survivor support, and the void of regulatory enforcement, themes of and/or actual image-based sexual abuse material persist on the websites of the world’s largest purveyors of pornography. Despite growing public outcry and lawsuits against pornography industry giants, the scourge continues.

The fallout for those victimized is staggering—many endure lifelong emotional, physical, and social trauma.

This report by the National Center on Sexual Exploitation (NCOSE) exposes the pornography industry’s role in fueling image-based sexual abuse, from enabling anonymous uploads to monetizing exploitative content. As we document, the kingpins of Internet pornography distribution have profited from the global dissemination of such material and actively shape user appetite for abuse through algorithm-driven recommendations and tags like “real amateur” and “hidden camera.”

This report also illuminates how technological advancements, such as AI, are amplifying IBSA. As generative technologies grow more accessible, personal images of individuals—not only public figures—are being manipulated to produce AI-generated pornography, further commercializing personal violations and obliterating the boundaries of personal autonomy.

Image-based sexual abuse is not just a legal or personal issue. It is a systemic societal crisis. Through policy reform and a cultural awakening to the harms of pornography consumption, IBSA, and the industry that profits from both, we can disrupt the continued normalization of IBSA and create a safer world. The National Center on Sexual Exploitation calls on the general public and policymakers to take urgent action. Key recommendations include enacting federal laws against nonconsensual distribution of sexually explicit content, mandating robust consent and age verification (not only age estimation) protocols, banning IBSA-themed material from online platforms, and developing advanced technologies to eliminate abusive content.

Every individual has the right to live free from the fear of their likeness being stolen, shared, manipulated, and/or exploited for sexual purposes. It is time to hold the pornography industry accountable for its role in fueling and profiting from IBSA and to ensure that no one victimized by perpetrators of image-based sexual abuse—be they individual actors or the largest pornography corporations in the world—is forced to fight alone.

**It is time to demand action. Join us in advocating for policies and systems that end image-based sexual abuse and which hold corporate kingpins of sexual exploitation accountable.**

## Part II | Introduction

Language shapes people's thinking and influences how they act.<sup>1</sup> As described by renowned psychologist Albert Bandura, "euphemistic labeling"—the practice of using language to relabel behaviors that harm others—is a convenient device for masking, minimizing, ignoring, or misconstruing the consequences of one's conduct.<sup>2</sup>

Euphemistic labeling occurs widely within the sphere of sexual abuse and exploitation. For example, news reports of rape have described offenders as "sleeping with" their victims,<sup>3</sup> men who engage in buying sexual access to other people are referred to as "clients,"<sup>4</sup> and strip clubs are described as "gentlemen's clubs."<sup>5</sup>

The word "fantasy" provides yet another example of euphemistic labeling. It is used to normalize the sexually exploitative material known as pornography. "Fantasy," according to Oxford Languages, is defined as "the faculty or activity of imagining things, especially things that are impossible or improbable," and as "an idea with no basis in reality."<sup>6</sup> The term is used by the general public and pornography users to describe the use of pornography as something that fulfills or merely represents "sexual fantasies."<sup>7</sup>

**Euphemistically labeling pornography in this way—as mere sexual fantasy—disconnects its production from the real people featured in it and the real sex acts which the pornography portrays, framing it as something that exists only in the imagination of its consumers or the pixels they see on their screens.** According to this labeling, if pornography only represents people's "fantasies," it is reasoned that pornography's production, distribution, and use must be harmless.

This belief is false.

Euphemistically labeling pornography as "fantasy" obscures the fact that typically what pornography consumers see depicted on their screens, and from which they derive sexual pleasure, **actually happened at a point in time to real people.**<sup>a</sup> Pornography depicted on mainstream pornography platforms is often degrading, abusive, violent,<sup>8</sup> and even includes sexual abuse and exploitation of women and children.<sup>9</sup> Further, its use is devoid of meaningful consent, sexual responsibility toward others,<sup>10</sup> and mutuality of pleasure between the consumer and the performer.

However, for some pornography consumers today, the use of permission-giving euphemisms to rationalize the use of hardcore pornography is unnecessary. The more "real" (i.e., not manufactured by the pornography industry) their pornography, the better.

The popular pursuit of "real" pornographic content has led to an explosion of nonconsensually shared sexually explicit material. The fact that those depicted did not consent to its creation and/or distribution is precisely what makes the material desirable to its consumers.

Whether one labels pornography as "fantasy" or "real," what is recorded, distributed, and monetized by the pornography industry platforms like Pornhub, XVideos, and XNXX all too often mimics or constitutes real-life sexual abuse and exploitation. This is especially evident regarding a form of sexual abuse referred to as **image-based sexual abuse (IBSA)**.

As this report will show, **the pornography industry has intentionally exploited and profited from the proliferation of IBSA on its distribution platforms, resulting in devastating harm to those depicted in this material.**<sup>b</sup>

**This cruel reality must be confronted.**

Image-based sexual abuse is an indefensible violation. Whether a person's image was taken secretly, stolen, initially shared consensually with a person (or persons), artificially created/edited and monetized for a wide audience—no person who has been victimized in this way "deserves" it. Every person should be able to live life free from nonconsensually shared sexually explicit images.

**The National Center on Sexual Exploitation therefore calls on the general public to demand that policymakers enact measures to stop the abuse and hold the pornography industry accountable. Specific policy measures are suggested at the end of this report.**



<sup>a</sup> This excludes, of course, various forms of cartoon pornography. It also excludes computer-generated forged pornography (also known as "deepfake" pornography), as this material is created with the use of innocuous images of women which are morphed into pornography using AI-related technologies. While those victimized in this way did not participate in the acts that such images portray, they nevertheless suffer extreme emotional and social harm from the circulation of such material on the Internet.

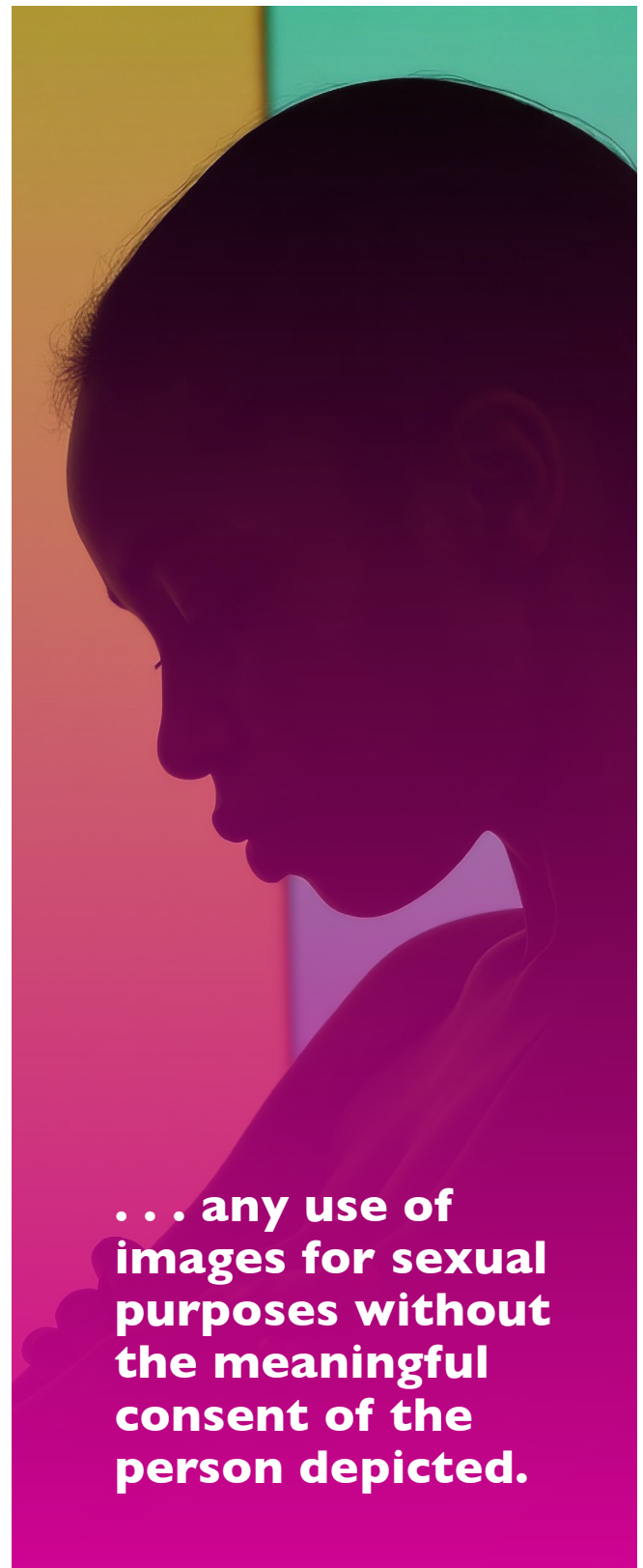
<sup>b</sup> The focus of this report is on individuals outside of the pornography industry who are victimized by having IBSA of themselves distributed on pornography platforms. However, pornography performers also experience forms of IBSA. This topic is addressed in Part VIII, subsection 7 of this report.

### Part III: What is Image-based Sexual Abuse (IBSA)

IBSA is the creation, manipulation, theft, extortion, threatened or actual distribution, or any use of images for sexual purposes without the meaningful consent of the person depicted. It includes nonconsensual distribution of sexually explicit material (popularly known as but not limited to so-called revenge pornography<sup>c</sup>), recorded sexual violence, computer-generated sexually explicit material (commonly referred to as “deepfake” pornography), and video voyeurism.<sup>d</sup> IBSA is often perpetrated in conjunction with other crimes such as domestic violence, doxing, and sexual extortion.



Importantly, sexually explicit and sexualized material depicting children ages 0-17 constitutes a distinct class of material, not to be confused as IBSA, known as child sexual abuse materials (CSAM) (i.e., “child pornography”) which is illegal under US federal statute. CSAM is sexually explicit conduct or lascivious exhibition of the genitals or pubic area of a person under the age of 18. Nudity is not a required element of the offense under federal law 18 USC 2256.



<sup>c</sup> While commonly referred to as “revenge pornography,” revenge is only one among various motivations for the nonconsensual distribution of sexually explicit material (see: Asia Eaton, Holly Jacobs, Yanet Ruvalcaba, 2017 *Nationwide Online Study of Nonconsensual Porn Victimization and Perpetration: A Summary Report* (Cyber Civil Rights Initiative, 2017), <https://www.cybercivilrights.org/wp-content/uploads/2017/06/CCRI-2017-Research-Report.pdf>.) This term inadequately communicates the scope and severity of the harm caused by this activity and its use should be avoided.

<sup>d</sup> For a complete review of IBSA types and terms see Lisa Thompson, Haley McNamara, Victoria Rousay, Lily Moric, Dawn Hawkins, and Dani Pinter, *Identifying Image-based Sexual Abuse: Classifications and Definitions* (Washington, DC: National Center on Sexual Exploitation, August 2024), [https://www.researchgate.net/publication/384396457\\_Identifying\\_Image-Based\\_Sexual\\_Abuse\\_Classifications\\_and\\_Definitions](https://www.researchgate.net/publication/384396457_Identifying_Image-Based_Sexual_Abuse_Classifications_and_Definitions). We reuse some language from our *Identifying Image-based Sexual Abuse* document (with or without modification) in Parts III and IV of this report.

## Part IV: Forms of IBSA Common in Mainstream Pornography

IBSA material is widely available on pornography platforms. A 2022 UK report found that in IBSA cases where content is nonconsensually shared, approximately 40% of the time, the sharing occurred on an Internet pornography website and that pornography websites were the top-ranking type of site where IBSA content of women was shared.<sup>11</sup> IBSA's presence on pornography websites led to the growth of IBSA-based pornography genres,<sup>e</sup> and inspires some viewers to become creators and distributors of IBSA material themselves.

Several forms of IBSA<sup>f</sup> are commonly found on pornography platforms. Examples include the following:

### 1. Nonconsensual Distribution of Sexually Explicit Material<sup>g</sup>

This form of IBSA occurs when someone shares sexually explicit images or videos of another person without their consent. Once this occurs, it is virtually impossible for survivors to get their content permanently removed.

"There is no end to it, there is no stop, there is no finale. . . . It's like, I'm quite aware that if I was to go on the internet or the porn websites now, I would . . . find the videos of me. . . . It's a crime that doesn't just happen and then that's done. It's something that is continual, and this could continue for I don't know how long. It could go on for bl\*\*dy ever."<sup>12</sup>

Anna | IBSA Survivor

### 2. Recorded Sexual Violence

Recorded sexual violence occurs when a person is sexually assaulted and the assault is captured by still photography or video recordings (often while the individual is incapacitated, drugged, asleep, or while a victim of sex trafficking). The recordings may be created by those who are engaging in the sexual assault or by bystanders. Often such videos are subsequently distributed via forms of information communications technology such as social media. The distribution of such recordings via mainstream pornography websites enables vast numbers of consumers to participate in and derive sexual pleasure from the assault or rape and exponentially compounds the trauma of those victimized.

The *New York Times* journalist Nicholas Kristof reported finding "many videos on Pornhub that were recordings of assaults on unconscious women and girls. The rapists would open the eyelids of the victims and touch their eyeballs to show that they were nonresponsive."<sup>13</sup>

### 3. Computer-Generated IBSA

In this form of IBSA, individuals, overwhelmingly women, are technologically forced into appearing nude or performing sexual acts by the theft of their images for the creation of forged pornography (popularly referred to as "deepfake" or "cheapfake" pornography). With the aid of widely available computer programs and apps, any woman's<sup>h</sup> visual identity can be stolen (e.g., misappropriated) and morphed into that of a hardcore pornography performer. The devastating impact of this abuse on survivors is not "fake" but real and lasting.<sup>14</sup>

An investigation by NBC News in 2023 found tens of millions of people have visited websites hosting forged pornography.<sup>15</sup> Two of the largest websites featuring this material were easily accessed via Google and the websites used the messaging platform Discord to advertise videos for sale and the creation of custom videos.<sup>16</sup>

Lauren Book, democratic state Senate minority leader in Florida, was extorted by a man who threatened to release sexually explicit "deepfakes" of Book unless she gave him \$5,000 worth of gift cards.<sup>17</sup> An investigation also discovered that AI-generated sexually explicit materials of Book and her husband were being bought and traded online.<sup>18</sup>

Research reported by *Wired* found that in addition to dozens of specific deepfake websites where such material is hosted and sold, 300 "general" pornography websites incorporate forged pornography in some way.<sup>19</sup> One of those "general" pornography websites was presumably Pornhub, where even though the company claimed it would stop hosting deepfakes in 2018, the company found ways (e.g., using inactive links as clickbait, algorithmic recommendations, keyword targeting in its advertising arm TrafficJunky, etc.) to exploit the popularity of deepfakes and to profit from them.<sup>20</sup>

<sup>e</sup> A 2014 news article in *The Economist* reported that as many as 3,000 pornography websites feature a "revenge" genre. While plausible, we have been unable to verify the veracity of this estimate but make note of it here as this figure is reported in some literature concerning IBSA. (See: "Misery Merchants: How Should the Online Publication of Explicit Images without Their Subjects' Consent be Punished?" *The Economist*, July 15, 2014).

<sup>f</sup> In offering the following non-exhaustive list of IBSA categories, we wish to acknowledge the pioneering work of Clare McGlynn, Erika Rackley, and Ruth Houghton in "Beyond 'Revenge Porn': The Continuum of Image-based Sexual Abuse," *Feminist Legal Studies* 25 (2017): 25–46, <https://doi.org/10.1007/s10691-017-9343-2>.

<sup>g</sup> Rather than the phrase "nonconsensual pornography" we use "nonconsensual distribution of sexually explicit material." NCOSE believes it is vitally important to stress that the nonconsensual element is the *distribution* of the material rather than the nature of the material itself. There are two reasons for this: 1) some IBSA material which is nonconsensually distributed is *initially* created and shared (e.g., with a romantic interest) of the creator's own volition; 2) pornography performers operating within the pornography industry may experience IBSA by the pirating of their material or by experiencing force, fraud, and coercion (i.e., sex trafficking) in pornography production. The term "nonconsensual pornography" obscures these concerns. Thus, we advocate for the disuse of "nonconsensual pornography."

<sup>h</sup> Computer-generated sexually explicit material overwhelmingly depicts females, however there are also instances where males have been victimized by this form of IBSA.



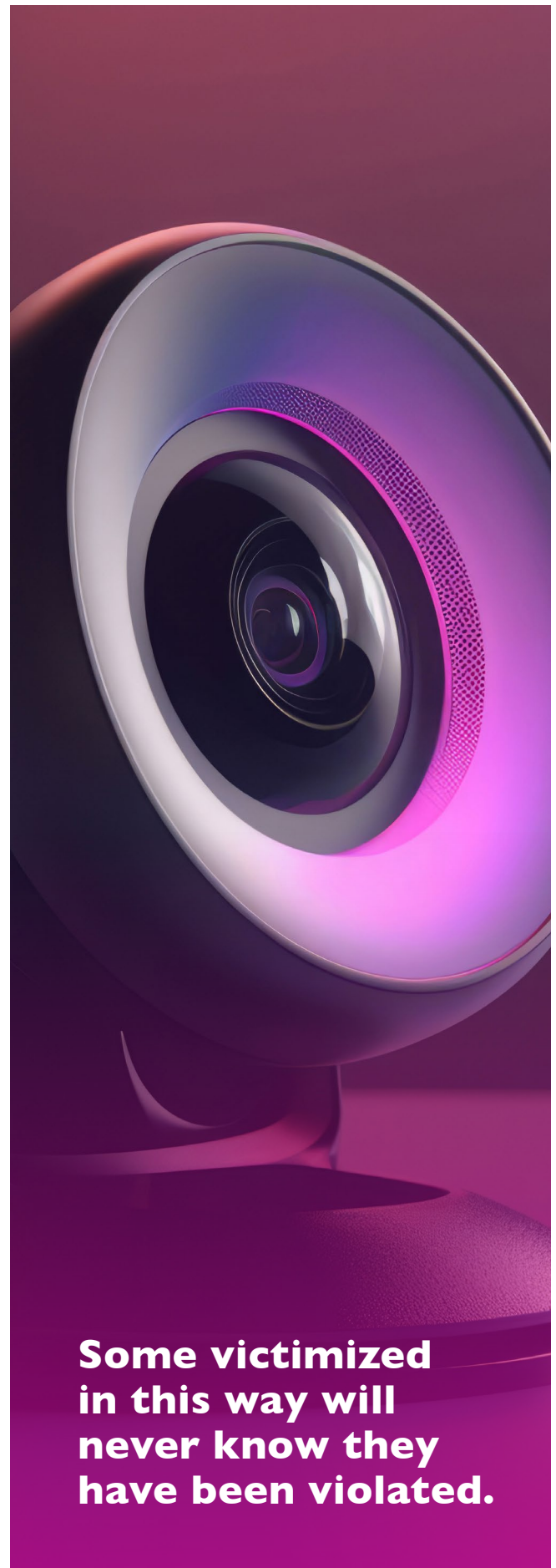
#### **4. Video Voyeurism:**

In cases of video voyeurism, the person depicted in sexually explicit material<sup>i</sup> had no knowledge that their images were being recorded while they changed clothes, showered, used the toilet, or engaged in what they believed were private sexual activities. Such videos may also be obtained when a woman is engaged in public activities and videos are surreptitiously recorded which attempt to get views under her clothing (i.e., “upskirting” and “downblousing”). Some victimized in this way will never know they have been violated. Others learn about the existence of the surreptitiously obtained videos when people alert them to their existence on public platforms such as pornography websites, and are left to wrestle with the feelings of sexual violation, fear, and distrust that inevitably follow.



Unsuspecting women and girls using the DC metro were violated by someone who made “upskirt” videos of them while they rode the train and uploaded them to the pornography site **xHamster**. A reporter writing about the story noted that **“the creepshot industry is positively booming: There are at least a dozen porn sites dedicated solely to upskirt photos and their ilk, to say nothing of the myriad Twitter feeds, forums and more generalist porn sites that host the stuff.”**<sup>21</sup>

In another example, dozens of secretly recorded videos of members of the US Navy and Marines in a bathroom, ostensibly taken via a peephole, **were uploaded to the pornography platform Pornhub.**<sup>22</sup>



**Some victimized  
in this way will  
never know they  
have been violated.**

<sup>i</sup> We define “sexually explicit” to include nudity and depictions of sex acts.



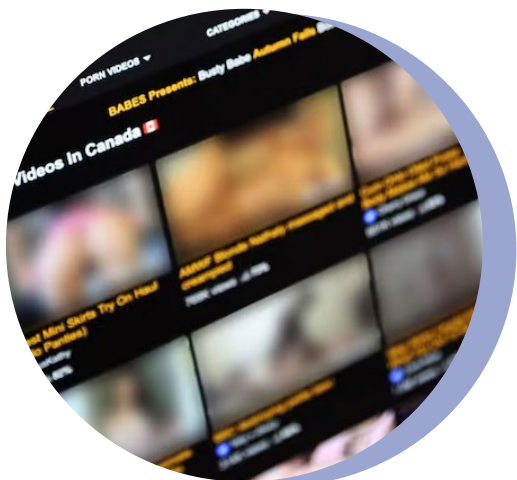
## Part V: Not a Fantasy, Harm in Real Life—Examples of IBSA on Mainstream Pornography Websites

The following are just a few illustrations of the innumerable instances of real-life harm caused by IBSA material hosted on mainstream pornography websites.

### Woman Discovers IBSA Material of Herself Was on Pornhub for a Decade:

Katelynn Spencer was shocked to learn that videos of her performing sex acts had been **uploaded to Pornhub ten years before** by a former male friend who had groomed and coaxed her into making a sex video with him. **The man recorded another video of her performing a sex act on him without her knowledge and uploaded it to Pornhub, this one with her name attached to it. This video garnered millions of views.** There were no laws regarding the nonconsensual distribution of sexually explicit material in her state. The fallout from this experience cost her relationships with family and friends, resulted in divorce from her husband, loss of her job, as well as extreme psychological duress and physical illness. Her sexual exploitation continues to this day, as she explains:

I couldn't physically, mentally, or emotionally handle my job because this is a continuous, retraumatizing event. Especially when I was recently informed, I have 'big fans' and stalkers on the dark web. This abuse is over and over and over. They are watched, commented on, downloaded, re-uploaded all the time. It is so hard to trust anyone.<sup>23</sup> (bold emphasis added)



### Pornhub Hosted Videos of Women Sex Trafficked for Pornography under “GirlsDoPorn” Brand:

A group of pornography producers and website operators sex trafficked young women for purposes of creating pornography videos they distributed on the GirlsDoPorn and GirlsDoToys websites, as well as the aggregator site Pornhub. The young women were typically lured by false ads for clothed modeling opportunities but, upon arriving at specified locations, were offered money to film pornography.<sup>24</sup> A variety of tactics utilizing force, fraud, and coercion were used against the women to compel them to perform filmed sex acts, including pressure to drink alcohol and smoke marijuana, threats to sue them, threats to cancel return flights that GirlsDoPorn had booked, and false promises that the videos would never be posted online and that the videos would not be released in the US.<sup>25</sup> While using the restroom, some women even had their clothes and belongings confiscated to prevent them from leaving.<sup>26</sup>

GirlsDoPorn was a member of MindGeek's (former parent company of Pornhub now known as Aylo) “Content Partner Program,” an arrangement which allowed it to receive a channel on Pornhub. Its Pornhub channel operated for more than eight years, during which time it garnered more than 670 million views<sup>27</sup> and 700,000 subscribers.<sup>28</sup> For months after survivors sued GirlsDoPorn in a civil case for fraud, emotional distress, and misappropriation of their likeness, Pornhub continued to host “dozens of videos with millions and millions of views.”<sup>29</sup> GirlsDoPorn videos were also shared on XVideos.<sup>30</sup>

In January 2023, Pornhub was arraigned on a charge of unlawful monetary transactions involving sex trafficking proceeds, and entered into a deferred prosecution agreement with the US Attorney's Office for the Eastern District of New York.<sup>31</sup> In a press statement, FBI Assistant Director-in-Charge James Smith stated:

Motivated by profit, Aylo Holdings [parent company of Pornhub] knowingly enriched itself by turning a blind eye to the concerns of victims who communicated to the company that they were deceived and coerced into participating in illicit sexual activity.<sup>32</sup>

### French Pornography Baron Arrested on Charges Involving Rape and Sex Trafficking:

Michel Piron, owner of one of France's largest pornography websites, **Jacque et Michel**, was arrested in June 2022 on charges including alleged complicity in rape, pimping, and sex trafficking of women they filmed for pornography, along with his wife and three male pornography performers.<sup>33</sup> The site marketed itself as a leading provider of so-called "amateur" content—a pornography genre that suggests that it depicts "nonperformers" engaged in private sex.



**French porn site owner arrested over rape and pimping accusations...**

### "Amateur/Real" Pornography: An Abuse-Riddled Genre

For more than a decade, pornography tube sites allowed anonymous third parties to upload vast volumes of their own content to their platforms. This user-generated pornography, also referred to as "amateur" or "real" pornography, appeals to many consumers because of its use of inexperienced performers—typically young women with no prior involvement in the pornography industry. It is valued for its perceived "realness" and "spontaneity" versus the manufactured and predictable nature of commercially produced pornography.<sup>34</sup> While the popular conception of "amateur" is that it involves only "ordinary" people who just like making and sharing pornography<sup>35</sup> (ostensibly for "fun" and not profit), the **reality is that this genre is rife with forms of IBSA (e.g., nonconsensually distributed pornography such as of intoxicated persons and ex-wives and ex-girlfriends, as well as of voyeur pornography from spycam sites).**<sup>36</sup>

**IBSA has mass appeal for pornography consumers looking for "amateur/real" content**, as IBSA videos are typically made either for private purposes and then distributed without the consent of the person(s) depicted, or they are obtained while the person is incoherent (i.e., drugged, intoxicated, asleep) or while they are unaware (i.e., secretly recorded).

Muddying these waters, "amateur" is also a genre of pornography produced and distributed by the pornography industry which **intentionally mimics nonprofessional pornography** (e.g., using no screenplay or storyline, no apparent editing, poor recording quality, first-person involvement of the video creator, etc.) and is a **staple of the mainstream trade.**<sup>37</sup> (The lines between user-generated "amateur" and industry-produced pornography are further blurred by the practice of referring to performers who operate independently or with small production companies as "amateurs" even though they seek remuneration for the pornography they produce.)

In the case of GirlsDoPorn, in which women were sex trafficked for pornography production, **the films were marketed exploiting the amateur aesthetic** with descriptive material stating that the brand's videos featured **"normal everyday" girls** and were **"'normal first timers' with 'no prior experience' in pornography. . . ."**<sup>38</sup>

In 2024, Pornhub reported that it saw an increase in "amateur" porn searches, stating "it seems that people want something more real!"<sup>39</sup> Of note, "real amateur" was among the top 30 search terms for the platform. "Amateur" was among the top five most popular search terms for countries like France and Italy, and grew in popularity by +308% in Spain.<sup>40</sup> A +457% increase in "dutch amateur homemade" was reported for the Netherlands.<sup>41</sup>

### **Woman's Image Stolen, Used for Dating and Erectile Dysfunction Ads**

A woman who works as a news anchor sued WCGZ S.R.O (XVideos' owner) and other tech companies for allegedly using her image for dating and erectile dysfunction ads without her knowledge.<sup>42</sup>

The woman learned of the existence of the ads from co-workers.<sup>43</sup> The image of the woman used in the ads was obtained from security camera footage at a convenience store.<sup>44</sup>

### **Women Twitch Streamers Sexually Abused via Forged Pornography**

Brandon "AtrioC" Ewing, a popular streamer on the video-gaming streaming platform Twitch, inadvertently revealed that he had paid to view realistic, forged pornography (popularly referred to as "deepfake" pornography) of fellow female Twitch streamers.<sup>45</sup> He purportedly viewed the IBSA material after seeing advertisements for it on Pornhub.<sup>46</sup> The women streamers featured in the videos had not appeared in pornography. They only learned that images of themselves had been used to create computer-generated pornography videos that were available on a subscription pornography website following the reports that Ewing had used the site.<sup>47</sup> One of the survivors had vowed to sue the creators of the material, but has since stated, "Every single lawyer I've talked to essentially have come to the conclusion that we don't have a case; there's no way to sue the guy."<sup>48</sup>

### **Women Athletes Sexually Abused Via Video Voyeurism and Trafficking of Material on Pornography Tube Sites**

In 2012, women who were part of a university field hockey team traveled to Limestone University, a private liberal arts college in South Carolina, to play its women's field hockey team. The women from the visiting team were directed by Limestone representatives to a men's locker room for their use before and after the game. While using the locker room to change clothes and shower, the women were surreptitiously video recorded via a hidden camera placed in the locker room by a Limestone employee.<sup>49</sup> The videos were subsequently uploaded to the websites of the mammoth pornography/technology companies Pornhub (owned by MindGeek, now known as "Aylo") and xHamster.<sup>50</sup>

These companies allegedly allowed, incentivized, and profited from content uploaded to their platforms by third parties. **Neither company required verification of the identity or consent of the women secretly filmed at Limestone when the image-based sexual abuse (IBSA) material was uploaded to their sites.**<sup>51</sup> It is alleged that the IBSA material was then categorized, titled, and tagged by the companies to direct pornography consumers to it.<sup>52</sup> MindGeek/Aylo's websites also featured a download button, facilitating the transfer and permanent control of the IBSA material to anyone, thus allegedly facilitating the mass sexual exploitation and sex trafficking of the women secretly filmed at Limestone.<sup>53</sup>

### **South Korea's Video Voyeurism Epidemic**

Prosecutors report that sexual crimes involving hidden cameras in South Korea increased elevenfold—from 564 in 2006 to 6,615 in 2017.<sup>54</sup> In 2016, more than 7,000 South Korean women found IBSA of themselves on pornography websites which included them engaged in activities such as sex, using the toilet, in bikinis, or walking on the street.<sup>55</sup> Frustrated by the widespread ongoing abuse, in May and August 2018, thousands of South Korean women rallied against the country's video voyeurism epidemic, many with signs saying, "Our lives are not your porn."<sup>56</sup> The social harm inflicted by the IBSA videos has led some women to hide from the public or even to have plastic surgery to change their physical appearance.<sup>57</sup> One South Korean woman tragically died by suicide in the aftermath of learning she was secretly filmed by a colleague in a hospital changing room.<sup>58</sup> Research into "tags" used to label pornography uploaded by third parties on xHamster, found that the term "Hidden Cams" was among the three most over-represented terms for pornography in the "Korean" nationality category on the site.<sup>59</sup>





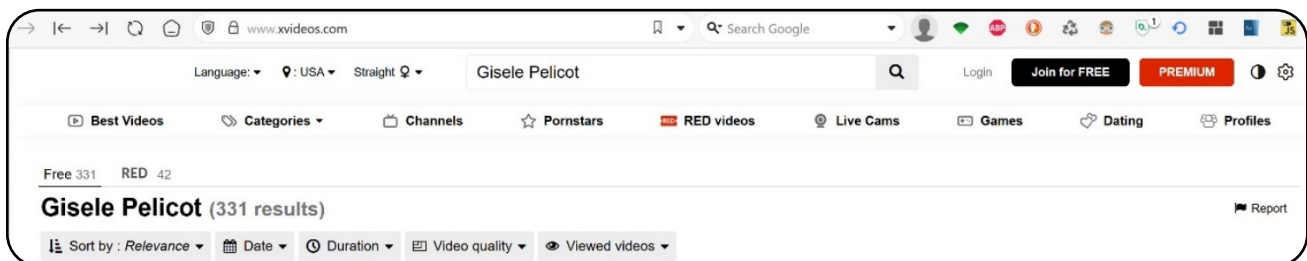
### Arrest of Man for Filming “Upskirt” Videos Leads to France’s Largest Rape Case

Following Dominique Pelicot’s arrest in 2020 by French police for attempting to film under the skirts of four women while at a supermarket, police found approximately 20,000 videos and films depicting the rape of his wife Gisèle Pelicot in a computer hard drive file titled “abuse.”<sup>60</sup> From 2011 to 2020, Dominique Pelicot had been giving his wife tranquilizers and filming her while sedated—in a condition the prosecutor described as “a state of torpor closer to a coma than sleep”—as men he invited to their home raped her.<sup>61</sup> Dominique Pelicot is believed to have recruited more than 80 men to rape his wife via an online chatroom called *A son insu* (i.e., “without her knowledge”)<sup>62</sup>; 51 men including her husband were convicted in the case.<sup>63</sup> Also noteworthy, in 2010, Dominique Pelicot was caught using a pen with a small hidden camera to film up women’s dresses while in a supermarket in Paris; he was fined and Gisèle was not informed of the incident.<sup>64</sup> He is also under investigation for the attempted rape of a woman in 1999 and the rape and murder of a woman in 1991.<sup>65</sup>

As of February 2025, it is unclear if Dominique Pelicot, or the other men who raped Gisèle, shared images or videos of the abuse via pornography or other online platforms. However, on at least one pornography site, XVideos, it is clear that Gisèle Pelicot’s abuse is of interest to their users, as the site returns 331 results for her name (see Figure 1). These videos may, or may not, be of Gisèle Pelicot. It is grotesque and deplorable that world’s second most popular pornography site is allowing the name of the world’s most known survivor of serial rape to return search results in order to entice and maintain the interest of users wanting to access videos of her rapes.



Figure 1: Search Results for “Gisele Pelicot” on XVideos, February 19, 2025<sup>1</sup>



<sup>1</sup> Screenshot captured February 13, 2025.

## Part VI: Traumatic Impact of IBSA on Those Victimized

IBSA is widespread and its impacts on survivors are broad and unrelenting. A study conducted in Australia reported that 1 in 5 persons of 4,274 participants (2,406 female; 1,868 male) had experienced at least one form of IBSA. Among those who had experienced IBSA, 80.8% of women and 72.9% of men reported feeling **annoyed, humiliated, depressed, angry, or fearful** as a consequence.<sup>66</sup> In 2017, an online survey of 3,044 individuals conducted in the US reported that compared to people without IBSA victimization, survivors of IBSA had **"worse mental health outcomes and higher levels of physiological problems."**<sup>67</sup> Informal, online survey data from August 2012 – December 2013 found that 51% of those victimized<sup>k</sup> by IBSA contemplated suicide as a result of their experience.<sup>68</sup>

Further, in a study which interviewed 75 survivors of various forms of IBSA from the UK, Australia and New Zealand, participants described additional impacts including social rupture (i.e., disruption of one's sense of self and relationships with others), the constancy of harm ("endlessness"), and a sense of what researchers termed "existential threat" (i.e., a sense of constant apprehension and perpetual vigilance).<sup>69</sup> One participant described feeling **"completely, completely broken"** and others described their experiences as **"life-ruining," "hell on earth,"** and **"a nightmare . . . which destroyed everything."**<sup>70</sup> One survivor stated, "[it] transcends [everything], it impacts you emotionally, physiologically, professionally, in dating and relationships, in bl\*\*y every single factor of your life."<sup>71</sup>

Often IBSA is a concurrent form of abuse alongside additional exploitative dynamics such as intimate partner abuse,<sup>72</sup> sexual extortion,<sup>73</sup> and sex trafficking.<sup>74</sup> Additionally, those victimized by IBSA often face the ordeal of being doxed—having their personal, identifying information published online—together with the images. A survey of IBSA survivors found doxing abuses were common: 59% reported that their full names were published alongside their sexually explicit imagery; 49% had social/network information shared; 26% an email address, 20% their phone number, 16% their home address, and 14% a work address.<sup>75</sup>

When victims report IBSA to law enforcement they may be dismissed, blamed, or ridiculed. Like other forms of sexual abuse, there is a societal trend toward victim blaming in IBSA cases.<sup>76</sup>

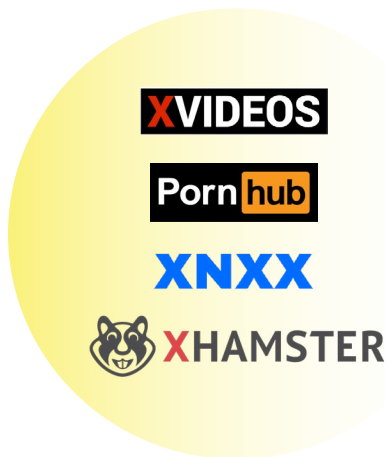


<sup>k</sup> There were 1606 total respondents of which 361 had been victimized.

## Part VII: Defining the “Pornography Industry”

### What Do We Mean by “Pornography Industry”

We use the term “pornography industry” to refer to **all owners, shareholders, directors, and employees of companies** involved in the **production, advertising, monetization, or distribution** of the depiction and commercialization of human nudity and/or sexual activity for consumption by third parties via visual, audiovisual, or virtually interactive means. Many business enterprises are fully engaged in such activities and comprise “the core” of the pornography industry. However, **much of the ownership, power, and control within the pornography industry is now held by its top online distributors.** Thus, most of the discussion that follows centers on these actors—the world’s leading pornography distributors—XVideos, Pornhub, XNXX, XHamster, and their parent corporations.<sup>1</sup>



Even so, it is important to note that other corporations—particularly **mainstream companies in the technology, social media, and financial sectors** (e.g., Fortress Investment Group, JP Morgan,<sup>77</sup> Raymond Chabot Grant Thornton, IBS Capital, Redwood Capital Management LLC, and Roystone Capital Management LP<sup>78</sup>)—facilitate the operations of the online pornography industry and have derived profits from the commodification of human sexual interactions. **The government of Quebec** extended subsidies to MindGeek from 2011 to 2018, totaling roughly \$189,215.<sup>79</sup> Until recently, **Mastercard and Visa** also played an important role as payment processors for MindGeek’s Pornhub and its advertising arm TrafficJunky.<sup>80</sup> **Grant Thornton Ireland** provided auditing services to four Dublin companies owned by MindGeek.<sup>81</sup>

Further, given the rampant presence of pornography on some mainstream platforms, such as [Instagram](#),<sup>82</sup> [Reddit](#),<sup>83</sup> [X \(Twitter\)](#),<sup>84</sup> and [Discord](#),<sup>85</sup> as well as the significant role these platforms play in advertising, monetizing, and normalizing pornography within popular culture, they, too, are rightly considered part of the pornography industry ecosystem. In the discussion that follows, however, we focus on the role of the major distributors of pornography in facilitating and profiting from IBSA and not the industry’s broader ecosystem.

**Yet, we must also emphasize that consumers of pornography, whether they pay for pornography or not, bear enormous culpability for the many harms of the industry** (IBSA-related and beyond), as their demand for pornography is the lynchpin on which the entire pornography industry spins.<sup>m</sup> Whether wittingly or unwittingly, **consumers enable and perpetuate industry-related harms and are therefore complicit in the vortex of physical, psychological, sexual, and sociological harms perpetuated by the pornography industry.**

All consumers of pornography, all mainstream companies that provide financing, marketing, web development, or other services to, and all parties involved in the many dimensions of the pornography industry—excluding those exploited in or sex trafficked for its production—bear responsibility for industry-related harms, including those inflicted by IBSA.

<sup>1</sup>The world’s top pornography distributors also engage in other aspects of the industry. For instance, MindGeek developed TrafficJunky, an advertising and digital marketing company that in 2021 reportedly served 4.6 billion ad impressions a day, as well as an “adult” video game subsidiary and a VPN product. See: Joe Castaldo, “Lifting the Veil of Secrecy on MindGeek’s Online Pornography Empire,” *Globe and Mail*, February 4, 2021, <https://www.theglobeandmail.com/business/article-mindgeeks-business-practices-under-scrutiny-as-political-pressure/>.

<sup>m</sup> Pornography consumers become full members of the “pornography industry” by creating and uploading content to pornography websites. Individuals consuming so-called “free pornography” nevertheless participate in a highly capitalistic system which generates large sums of money from advertising.





**“We must also emphasize that consumers of pornography, whether they pay for pornography or not, bear enormous culpability for the many harms of the industry.”**

### Power and Influence within the Pornography Industry

While it may appear otherwise, the pornography industry is a highly concentrated oligopoly consisting of three entities:

- **WebGroup Czech Republic (WGCZ) Holding**
- **Ethical Capital Partners/Licensing IP International S.ár.L.**
- **Hammy Media LTD**

#### WebGroup Czech Republic (WGCZ)

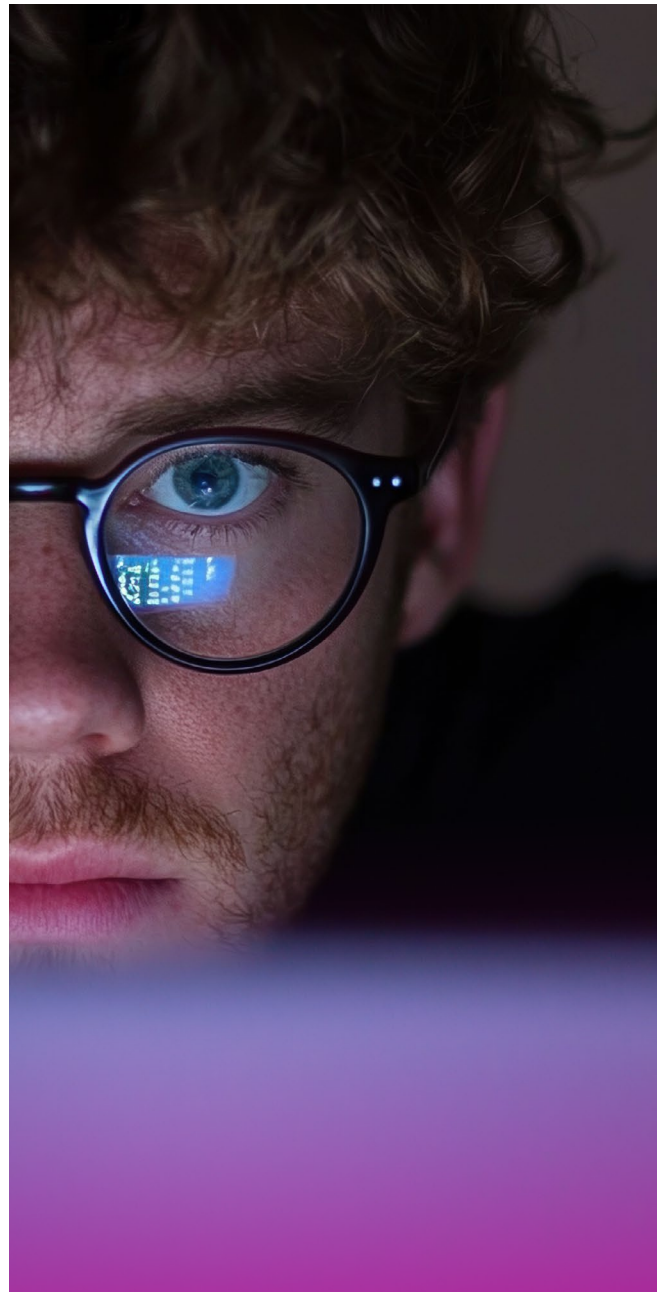
Two of the world’s top pornography sites, XVideos and XNXX, are owned by an intricate and intertwined group of companies, of which the principal is WebGroup Czech Republic (WGCZ) Holding. At least 60 companies are related to or owned by WGCZ, including Bang Bros, DDF Network, Penthouse entities, Private Media Group, Erogames, Traffic F, and GTFlix TV, VS Media, Inc.<sup>86</sup>

#### Ethical Capital Partners/Licensing IP International S.ár.L.

The pornography tube site Pornhub operates under the corporate banner “Aylo,” formerly MindGeek.<sup>87</sup> MindGeek was purchased for US\$400 million in March 2023 by the British Virgin Islands-based, private equity firm known as Ethical Capital Partners (no, we are not kidding).<sup>88</sup> The deal purportedly made Fady Mansour owner of 75 percent of the three entities dubbed “shadow MindGeek”—FDCO Holding (Feras Antoon and David Tassillo principals), Acaju Investments S.A. (Bernd Bergemar owned), and RK Holdings LLC (Bergemar owned).<sup>89</sup> However, it has been alleged that Ethical Capital Partners “pretended” to buy MindGeek, leaving Bernd Bergemar (also spelled “Bergmair”), Feras Antoon, and David Tassillo the real owners of the pornography giant.<sup>90</sup> In addition, the trademark of Pornhub is held by **Licensing IP International S.ár.L., which also holds the trademarks of nearly 300 pornography sites and businesses** such as Boys First time, Brazzers,<sup>91</sup> Dick Dorm, Dron Porn, Extreme Asses, Hentai Pros, Let’s Try Anal, MindGeek, Moms Bang Teens, Peeperz, Reality Dudes, Reality Kings, Real Amateurs, Red Tube, Twistys, YouPorn, and XTube.<sup>91</sup> Despite promises of “transparency,” Ethical Capital Partners has not revealed the details of its acquisition, thus the current ownership of Aylo/MindGeek remains unclear.<sup>92</sup>

#### Hammy Media LTD

Another titan of online pornography is Hammy Media LTD, owner of **xHamster**. Extensive research by a German journalist revealed that its likely owners are **Oleg Netpenko and Dmitry Gusev**.<sup>93</sup> That research also revealed a multilayered structure of affiliated businesses, including entities such as TrafficStars LTD, xHamsterLive, Faphouse, Technius LTD, Tecom LTD, Online Media Entertainment Holding, and Wisebits LTD.<sup>94</sup> xHamster.desi also appears to be a related entity.<sup>9</sup>



<sup>91</sup> Brazzers, as well as Mofos and Digital Playground, are production arms of MindGeek/Aylo.

<sup>92</sup> “Desi” is a term used to describe people (or other things) from the Indian subcontinent. However, xHamster.desi does not feature pornography exclusively of people from that geographic region.

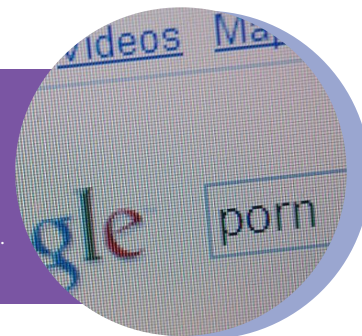


## Part VII: Defining the “Pornography Industry” (Continued)

“... in the pornography world, the competition between the two companies, MindGeek and WGCZ, is fierce. They’re like rival clans, the Montagues and Capulets of porn.”<sup>95</sup>

Patricia Nilsson | *The Financial Times*

XVideos received more total web traffic in January 2024 than Internet giants Amazon, TikTok, and Netflix.<sup>96</sup> At that time, Pornhub and XNXX outranked the global traffic of Reddit, LinkedIn, and Netflix.



**Table 1: World’s Top Pornography Platforms According to 2024 Similarweb Global Web Traffic Data<sup>97</sup>**

Pornography Platform	2024 Global Ranking	2024 Total Visits	Average Monthly Unique Visitors	Industry Rank	Corporation	Owners/Founders	Year Founded <sup>p</sup>
Pornhub	16th	21.5 B	290.8 M	1st	Mind Geek/Aylo	Current owners: Ethical Capital Partners (Fady Monsour 75% shareholder) <sup>98</sup> and Licensing IP International S.àr.L. Past owners include: Bernd Bergemar, Feras Antoon, David Tassillo, and Fabian Thylmann <sup>99</sup>  Founders of Pornhub: Matt Keezer, Stephane Manos, Ouissam Youssef, and Feras Antoon <sup>100</sup>	2007 <sup>101</sup>
XVideos <sup>q</sup>	17th	16.2 B	202.2 M	2nd	WebGroup Czech Republic (WGCZ Holding) <sup>102</sup>	Stephane Michael Pacaud and Deborah Malorie Pacaud <sup>103</sup>	1997 <sup>104</sup> /2007 <sup>105</sup>
xHamster	26th	11.4 B	201.2 M	3rd	Hammy Media LTD <sup>106</sup>	Oleg Netepenko and Dmitri Gusev <sup>107</sup>	2007 <sup>108</sup>
XNXX	30th	10.3 B	142.6 M	4th	WebGroup Czech Republic (WGCZ Holding) <sup>109</sup>	Stephane Michael Pacaud and Deborah Malorie Pacaud <sup>110</sup>	1997 <sup>111</sup> /2003 <sup>112</sup>

<sup>p</sup> We have not been able to establish with absolute certainty when XNXX and XVideos were established. For instance, one source claims that domain names for XVideos and XNXX were created in 1997 but provides no evidence (see endnote 90). In another source, WGCZ S.R.O. claims to have acquired the domain name [XNXX.com](https://xnxx.com) on February 22, 2003. This leaves open the possibility that [XNXX.com](https://xnxx.com) was in use at an earlier date by another party (see Decisión del Panel Administrativo no D2014-0494 of WIPO Arbitration and Mediation Center, Tuesday June 17, 2014, case WGCZ S.R.O. v. Whois Privacy Services Pty Ltd./Murat Yikilmaz, <https://international.vlex.com/vid/wgcz-whois-privacy-ltd-murat-yikilmaz-516274294>). It is widely stated on the Internet that XVideos was founded in 2007, but we were unable to identify formal evidence supporting this date (see endnote 90).

<sup>q</sup> XVideos and XNXX purportedly provide different interfaces to the same corpus of videos. See Mazieres et al. at endnote 91.



## Part VIII: How The Pornography Industry Fuels IBSA

### Nine Ways the Pornography Industry Fuels Image-based Sexual Abuse

The mainstream pornography industry fuels IBSA and harm to the people it depicts in at least nine ways:

#### 1. Sexual socialization of pornography users to IBSA:

IBSA on pornography platforms is categorized and tagged using IBSA-related search terms and thus presents IBSA and those portrayed in it as **sex objects** for masturbatory use by pornography consumers.

#### 2. Industry profiteering – the “free” pornography profit model:

For years ubiquitous amounts of “free” pornography uploaded to tube sites by unknown third parties drew vast amounts of traffic to their sites. This was (and in some cases remains) the basis of the industry’s profitability and incentivizes them to ignore blatant IBSA (and CSAM) on their platforms.

#### 3. Disregard for age and consent verification law:

For more than a decade, pornography platforms ignored an existing law requiring age and identity verification of those depicted on their platforms.

#### 4. Anonymous user uploads and lack of robust content moderation:

Nonexistent or inadequate screening protocols for uploaders of content to pornography platforms allowed IBSA material to become public on pornography sites. Lack of vigorous content moderation allows the material to remain on pornography platforms indefinitely.

#### 5. Mass publicization and global trafficking of IBSA:

IBSA uploaded to pornography platforms publicizes it to their global audience of consumers. Additionally, platforms have allowed, or continue to allow, the downloading of IBSA material shared on their platforms thus facilitating its global distribution.

#### 6. Facilitation of serial sexual abuse and exploitation:

Hosting, enabled downloading, and harvesting of IBSA material from pornography websites fuels survivors’ perpetual, mass sexual abuse and exploitation by allowing countless others to possess and/or profit from the material, causing them incalculable, lifelong emotional, physical, and social distress.

#### 7. Failure to protect pornography

##### performers from pirating of content:

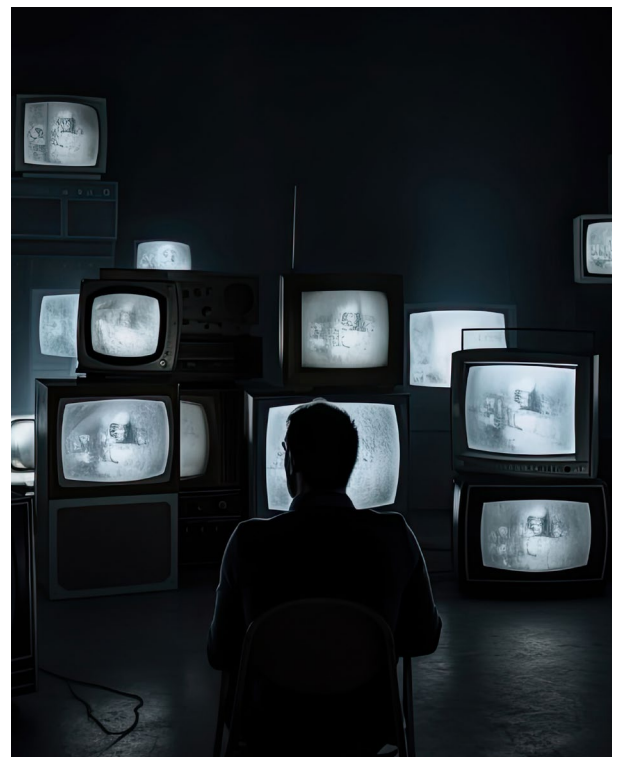
Pornography tube sites have depended on copious amounts of pirated pornography (i.e., copied and redistributed without compensation to the creator/s) as a key component of their “freemium” profit model. This exploits pornography performers, not only sexually, but also monetarily.

#### 8. Exploitation of AI and normalization of forged pornography:

Pornography site images—including images of sex trafficked persons—have been nonconsensually harvested from pornography sites and used to create so-called “artificial” or “deepfake” pornography. This constitutes nonconsensual use of the performers’ material and therefore is a form of IBSA. The industry also largely turns a blind eye to the presence of deepfake material on their platforms.

#### 9. Lack of meaningful survivor-support services and failure to permanently remove IBSA:

Pornography platforms lack robust, survivor-centered processes for the removal of IBSA from their sites, which forces victims to continually monitor pornography platforms to report and request removal of their sexual abuse material. Thus, the pornography industry transfers the onus of responsibility for this task to survivors and furthers their mental anguish.



## Pornography Industry Culpability for the Exponential Rise of IBSA

A large portion—if not the majority—of the responsibility for the rise in image-based sexual abuse lies at the feet of the pornography industry. As noted above, it has fueled the exponential rise in IBSA in nine ways:

- 1) sexual socialization of pornography users to IBSA
- 2) industry profiteering— the “free” pornography profit model
- 3) disregard for age and consent verification law
- 4) anonymous user uploads and lack of robust content moderation
- 5) mass publicization and global trafficking of IBSA
- 6) facilitation of serial sexual abuse and exploitation
- 7) failure to protect performers from pirating of content
- 8) exploitation of AI and normalization of forged pornography
- 9) lack of meaningful survivor-support services and failure to permanently remove IBSA.

In what follows, we take a deeper look at these issues.

### 1. Sexual Socialization of Pornography Users to IBSA

The technological advances afforded by broadband Internet access and high-quality streaming video,<sup>113</sup> as well as smartphones and other mobile devices,<sup>114</sup> ushered in the rapid transformation of the pornography industry in which its prior analog forms like magazines and VHS tapes gave way to an almost entirely online industry. This shift made pornography vastly more accessible. While Playboy’s peak circulation in November 1972 was 7.16 million,<sup>115</sup> Pornhub reported in 2021<sup>1</sup> that 130 million people visited its site daily<sup>116</sup> and there are now billions of visits to the world’s top pornography sites monthly (see Table 1).

Additionally, with the advent of Web 2.0—a period during which traditional consumers of Internet content were transformed into producers and distributors of media via platforms like YouTube—the pornography industry’s business model was further revolutionized.<sup>117</sup> Popularly referred to as “Porn 2.0,”<sup>s</sup> the hallmark of this new era is the pornography “tube site” (i.e., aggregator websites) where pornography consumers upload/distribute their own pornography, as well as view, comment on, rate, and promote the content of others.<sup>118</sup> Thus, in a phenomenon termed “prosumption” many pornography consumers transitioned from passively consuming whatever the pornography industry churned out, to becoming active participants in pornography production—“prosumers.”<sup>119</sup>

These unverified consumers/producers of pornography had free reign to anonymously upload content to tube sites, helping the industry ensure a sufficient supply of “fresh” and “free” material to keep consumers coming back.<sup>t</sup> This material comprised a substantial portion of the content available on tube sites supporting their “freemium” profit model, which required large amounts of “free” pornography to attract consumers, a subset of whom the industry seeks to convert into payees by offering a diversified range of products, including “camming,”<sup>u</sup> custom videos,<sup>v</sup> merchandise,<sup>120</sup> as well as dating and escort prostitution sites.<sup>121</sup> Some of this free pornography is/was pirated,<sup>122</sup> some of it is commercially produced, and significant amounts are/were “user-generated.”<sup>123</sup>

As reported by Pornhub, 6.83 million new videos were uploaded to the site in 2019.<sup>w</sup> They claimed that if a person began viewing all those videos consecutively starting in 1850 that the person would still have been viewing them in 2019.<sup>124</sup>

A longitudinal study found that among a sample of adolescents and young adults pornography use was associated with an increased willingness to nonconsensually share sexually explicit sexts of a stranger. Pornography use also predicted nonconsensual sharing of sexually explicit sexts of friends and ex-partners for those with high “instrumental attitudes,”<sup>x</sup> and of a dating partner for those with low instrumental attitudes toward sex.<sup>125</sup>

<sup>1</sup>This is the most recent year for which Pornhub published this data point.

<sup>s</sup>Long before “Porn 2.0” some pornography sites utilized user-generated material, such as Voyeurweb, which was founded in 1997. The website allowed feedback from users and featured discussion forums. It should be noted that as a voyeur-based pornography website, the material inherently constituted IBSA of those it portrayed. Regarding Voyeurweb, see: David Slayden, “Debbie Does Dallas Again and Again: Pornography, Technology, and Market Innovation,” in *Porn.com: Making Sense of Online Pornography*, ed. Feona Attwood (New York, NY: Peter Lang Publishing, 2010).

<sup>t</sup>The fact that pornography tube sites depended on anonymously uploaded user-generated content for many years is undeniable. However, since a major spotlight was placed on the pornography industry by journalists, beginning with a piece by Nicholas Kristof in December 2020, it is now less clear how much pornography continues to be sourced from unverified uploaders as some pornography websites have implemented user-verification requirements.

<sup>u</sup>“Camming” is a term that refers to the practice of producing live sexual performances via the use of web cameras which are streamed to others over the Internet in return for various forms of remuneration.

<sup>v</sup>“Custom videos” in this context refers to the creation of pornography for a particular buyer/consumer according to their specifications, also known as “bespoke” pornography. Both camming and custom video production are forms of online prostitution.

<sup>w</sup>The year 2019 marks the peak of user uploads to Pornhub for years prior to 2020. Pornhub did not publish its total number of user uploads for 2020—the year it came under intense scrutiny for the presence of CSAM and IBSA material on its platform. Since then, the total number of user uploads to Pornhub has been much smaller as illustrated in Table 4.

<sup>x</sup>“Instrumental attitudes” towards sex hold that “the sole purpose of sex is to have pleasure and excitement without the need for love or intimacy.” See endnote 125, page 1123.

## Part VIII: How The Pornography Industry Fuels IBSA (Continued)

The availability of massive volumes of free pornography, along with the use of aggressive marketing tactics<sup>126</sup> and its ability to harness data mined from billions of views,<sup>127</sup> positioned the pornography industry as the **key institution for shaping society's, indeed the world's, norms of sexual conduct.**<sup>128</sup> This influence over societal sexual norms extends to IBSA in the following ways:

- A) the pornography industry's normalization of IBSA and**
- B) the pornography industry's active shaping of their consumers' sexual appetite for IBSA.**

### A. The Pornography Industry's Normalization of IBSA

For years mainstream pornography websites like **Pornhub, XVideos, and XNXX** have hosted material uploaded by anonymous users (i.e., prosumers). Journalist Nicholas Kristoff documented that on Pornhub, some of this material was **IBSA-based, such as "revenge" pornography, spy cam videos of women showering, and sexual assaults of unconscious women.**<sup>129</sup>

In her book *Take Down: Inside the Fight to Shut Down Pornhub for Child Abuse, Rape, and Sex Trafficking*, Laila Mickelwait writes of finding thousands of IBSA videos (as well as child sexual abuse material) on Pornhub. In describing a video of a naked and drunk woman which was uploaded to the site, Mickelwait notes how commentators mocked the woman saying, **"I would take advantage of her all night,"** and **"So hot. Love how drunk she is."**<sup>130</sup> (bold emphasis added)

An investigation by journalists into **XVideos** found that it was easy to find videos similar to those which Kristoff and Mickelwait had documented were available on Pornhub. In their report, the journalists described one such video of an unconscious woman being sexually assaulted. In the video, which at the time had 121,000 views, someone left the comment, **"I love the fact that she looks so lifeless lol."**<sup>131</sup> At that time there were also XVideos search categories such as **"against her will"** and **"drugged and f\*\*cked."**<sup>132</sup>

Journalists documented image-based sexual abuse on XVideos<sup>133</sup> including:

- A video of a man's hand penetrating a motionless woman. The anonymous uploader commented, "This was New Years Eve. My girlfriend was upstairs sleeping, while I was fingering her drunk friend." (368,000 views)
- A video of a man masturbating with the limp hand of a woman who appeared unconscious. (1.2 million views)

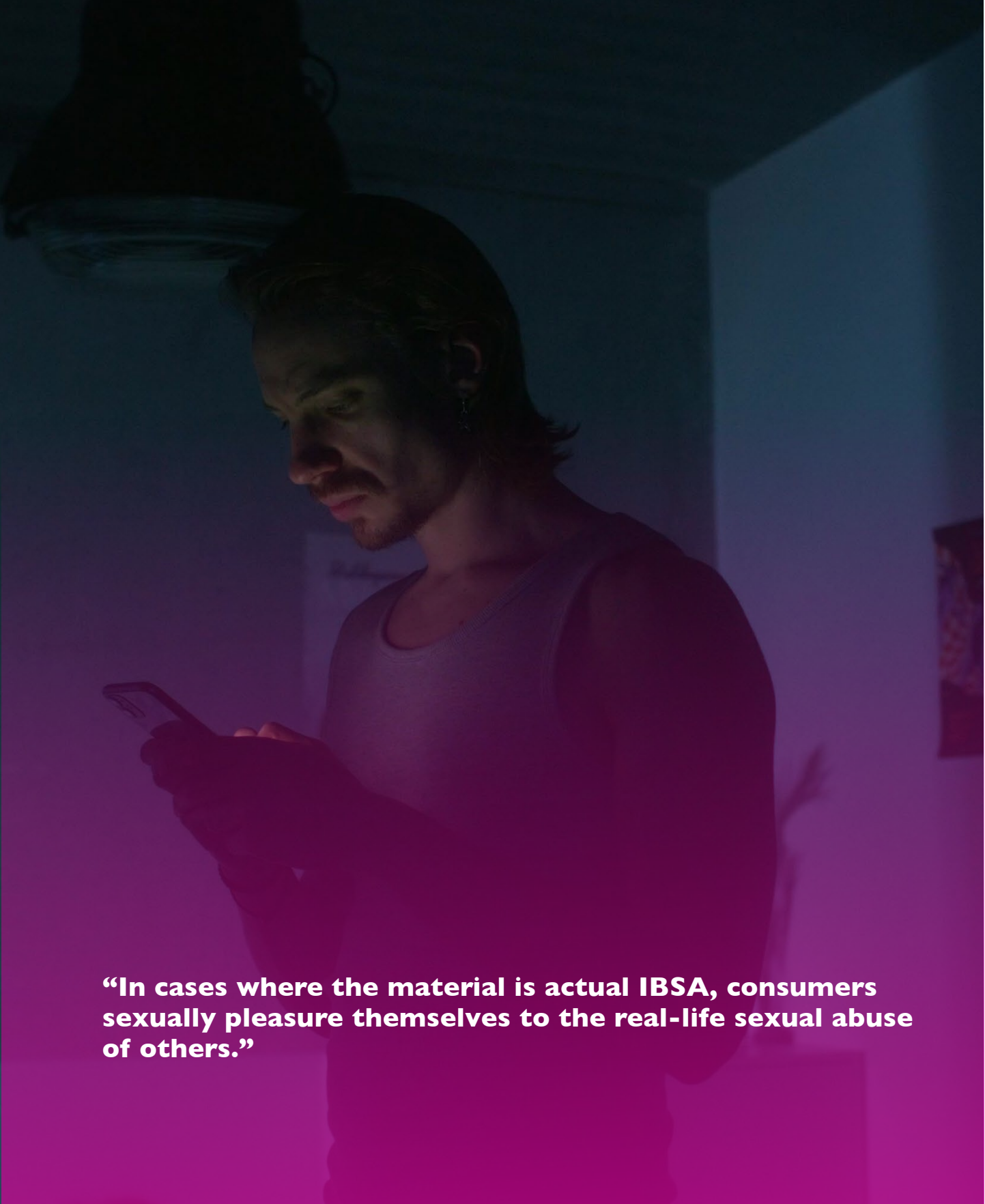
Additionally, researchers in the UK who conducted a content analysis of pornography video titles appearing **only on the landing pages of Pornhub, XVideos, and XHamster** for a period of six months during 2017-2018, reported that **1 in every 8 titles (12%) described activities that constitute sexual violence, including IBSA.**<sup>134</sup> Image-based sexual abuse was the third most common category of sexual violence, depicted in 2.2% of titles. This category included so-called "revenge porn," "upskirting," and spy cam video titles. The predominant focus in the category was on voyeurism, with "voyeur" and "hidden" being the most common words identified.

While 2.2% may seem like a small number, when considered in the context of the **billions of monthly views** occurring on these sites (see Table 1), their potential socializing influence on platform users—to accept IBSA as masturbatory material or as acceptable behavior in which to engage offline—is immense. This is because landing pages (i.e., "home" pages) are "the most visible part of the website, and therefore common to most users regardless of individual browsing patterns."<sup>135</sup> Further, the study only assessed titles from landing pages, not the titles on myriad other pages of available content, nor did it conduct analysis of video content which may depict IBSA even though it was not given an IBSA-themed title. Thus, the total amount of IBSA material contained within these websites is likely much greater than what was found in the analysis of landing page pornography video titles.

It is also important to recognize that content on pornography tube sites is categorized and tagged. Mazieres et al. explain, "Tags, categories and keywords are similar words for semantic descriptors. They are fundamental elements of the contemporary web: they sort content into menus and lists. They are the basis of the algorithms that allow content to be indexed in such a way as to improve the searching and browsing experiences of users."<sup>136</sup> Relative to pornography platforms, this practice has been described as being "predominantly concerned with labelling women and categorizing female bodies from a male and heterosexual point of view."<sup>137</sup>

In other words, indexing and categorization by use of tags creates visibility for subcategories and gives pornography platform users faster access to the specific content they seek.<sup>138</sup> IBSA-related tags on pornography uploaded to pornography tube sites enable users to easily locate IBSA-themed material. Whether such videos involve real IBSA or are staged to suggest IBSA, the **labels/tags socially condition pornography consumers** to consider IBSA as suitable material for masturbation and normalize IBSA behaviors.



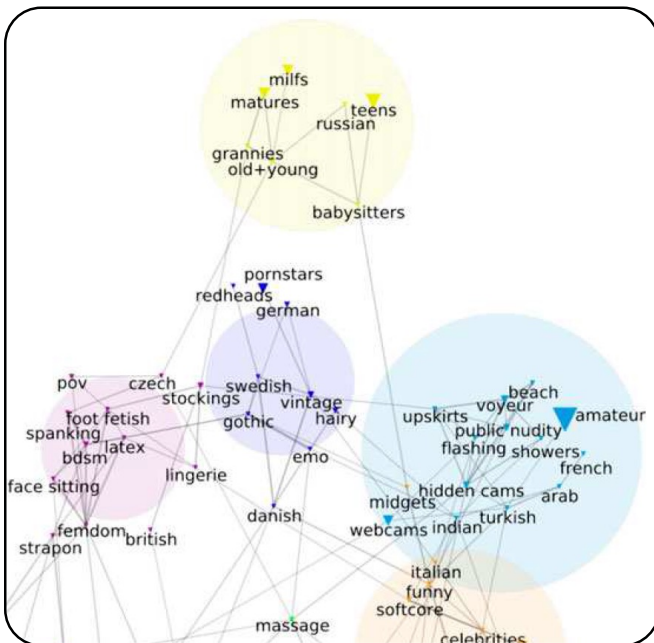
A photograph of a man with dark hair and a beard, wearing a white tank top, looking down at a smartphone in his hands. The scene is dimly lit with a strong blue and purple color cast. The background is dark and out of focus, showing some architectural elements like a ceiling light fixture and a wall.

**“In cases where the material is actual IBSA, consumers sexually pleasure themselves to the real-life sexual abuse of others.”**

## Part VIII: How The Pornography Industry Fuels IBSA (Continued)

Research conducted on databases of pornography tags assigned to videos uploaded by third parties on xHamster and XNXX found that on both sites the term “amateur” pertained to 30% of entries on the sites, revealing the term’s dominant popularity.<sup>139</sup> Additionally, a network analysis of xHamster tag data identified a strong association between IBSA-related tags such as “upskirts,” “voyeur,” “showers,” and “hidden cams,” and the tag “amateur” as shown below.<sup>y</sup>

Figure 2: xHamster Tag Network<sup>140</sup>



Further, pornography platforms often feature algorithmic “recommendations” that profile popular content or elevate specific content based on users’ profiles and/or viewing history.<sup>141</sup> The result is technologically engineered pornography that has the power to replicate and reinforce powerful sexual norms.<sup>142</sup>

In 2019, Henry and Flynn reported “a large demand for nonconsensual imagery on pornography sites.”<sup>143</sup> Specifically, on one unnamed site, they found 17,358 videos under “Revenge Porn,” 16,619 videos under “Ex-Girlfriend,” 15,965 under “Hidden Cam,” and 9,160 under “Leaked.”<sup>144</sup>

It is now early 2025—more than four years since *The New York Times* exposé which brought high profile awareness to the IBSA and CSAM existing in plain sight on Pornhub.<sup>145</sup> While Pornhub has implemented measures aimed at stopping the sharing of IBSA and CSAM on its platform,<sup>146</sup> as Table 2 demonstrates, Pornhub continues to provide results for pornography under IBSA-themed search terms. WGCZ Holdings’ companies XVideos and XNXX do so as well, and on a much larger scale. We documented that Pornhub, XVideos, and XNXX are providing search returns for IBSA-themed categories such as “leaked,” “real hidden,” “spy,” “upskirt,” “voyeur,” and many others.

Figures 3 and 4 illustrate that IBSA is present on both XVideos and XNXX in 2025 and user download capacity is enabled, and shows the number of views for such content. Figures 5-8 provide illustrations of IBSA-related search terms on XVideos.<sup>z</sup>

IBSA-themed material is searchable on top pornography tube sites by a wide variety of terms, many of which intentionally utilize misspellings, slang, abbreviations, or spacing variations. Such tactics help uploaders avoid the already low probability of their material being removed by moderators (see footnotes jj-ll).

According to video titles, common places for obtaining voyeur-themed videos include public restrooms, changing rooms, Airbnbs, hotels, beaches, and gynecological facilities.



<sup>y</sup> This is a partial image of the xHamster tag network; to view the full network, see endnote 140.

<sup>z</sup> Whether the videos provided in these search results are actual IBSA we are uncertain. The point here is that IBSA-related search terms are operational on Pornhub, XVideos, XNXX, and xHamster. These search terms are both a reflection of the types of content that their users are seeking, as well as of Pornhub, XVideos, XNXX, and xHamster continuing to fetishize IBSA by recommending and surfacing material under IBSA themes.

**Table 2: Number of Videos Returned for IBSA-Related Search Terms for the World's Top Four Pornography Sites Dec 2023 & Feb 2025<sup>aa</sup>**

Search Terms	Pornhub Dec 2023	XVideos Feb 2025	XNXX Feb 2025	xHamster Feb 2025
AI Porn <sup>bb</sup>	48,585	198,718	230,866	128,700
Amateur	2,037,464 <sup>cc</sup>	474,373	391,940	1.1 M
Celebrity Sex Tape	918	287,113	319,701	330
Deep Fake	IBSA Warning Message	75,761	95,022	No results
Hidden	3,179	13,636	14,960	No results
Leaked	20,072	3,393	2,470	2,300
Only Fans <sup>dd</sup>	8,039	No Results	42,484	18,600
Real Celebrity Sex Tape	Unknown <sup>ee</sup>	346,745	86,881	1.9M
Real Hidden	1,057	81,758	90,370	No results
Real Hidden Camera	IBSA Warning Message	98,475	110,351	No results
Real Voyeur	4,248	95,680	101,533	No results
Spy	6,326	13,051	10,621	745
Stolen	IBSA Warning Message	1,029	1,134	No results
Toilet Voyeur	295	24,353	24,661	No results
Upskirt <sup>ff</sup>	9,781	8,664	93,670	No results
Voyeur	22,690	28,637	27,162	No results

<sup>aa</sup> We do not assert that all the videos returned for these search results are actual IBSA. The point here is that IBSA-related search terms are operational on Pornhub, XVideos, XNXX, and xHamster. These search terms are both a reflection of the types of content that their users are seeking, as well as of Pornhub, XVideos, XNXX, and xHamster continuing to fetishize IBSA by recommending and surfacing material under IBSA themes.

<sup>bb</sup> The search term for Pornhub was "AI" and "AI Porn" for XVideos and XNXX.

<sup>cc</sup> Since first beginning our research for this report, Pornhub has stopped providing counts for the total numbers of videos related to specific search results except for major categories such as "amateur." Consequently, the video totals reported for Pornhub are from December 2023, with the exception of "amateur," which is the number provided in the "categories" listing as of February 20, 2025. The search results on Pornhub for terms indicating IBSA warnings returned these results in both December 2023 and February 2025. All other search term yield results. Additionally, the list of terms here is not exhaustive; other IBSA-themed search terms likely exist on these platforms.

<sup>dd</sup> We do not assert that all videos returned for "Only Fans" are actual material from OnlyFans. However, any material originating from OnlyFans on these sites that is not posted by the performer is pirated and therefore nonconsensually distributed. Potential OnlyFans content on XNXX is searchable by the term "Only F"

<sup>ee</sup> We added the search term "real celebrity sex tape" to our list in 2025 and therefore cannot determine the total number of such videos available in the Pornhub corpus. See footnote "bb" above.

<sup>ff</sup> The figure reported for XNXX is the term upskirt with a space between "up" and "skirt": "up skirt."



### XVideos and XNXX Normalize Video Voyeurism

In February 2025, the pornography website XVideos returned 95,680 results for the term "real voyeur"; for the same term, XNXX returned 101,533 videos and an additional 18,800 "gold" videos, which were accessible with payment. Voyeur and spying-related titles included:

#### XVideos

- "Spy on women of all ages with spycam in public bathroom" (**885.3K views**)
- "Old gynecologist runs a hidden cam to spy on p\*\*y" (**473.5K views**)
- "Spying in the dressing room" (6.2M views)
- "Teen girl caught by spy cam" (8.1M views)
- "Amateur blonde has no idea about spy cams" (**5.7M views**)
- "Hidden camera in real Russian public bathroom" (**585K views**)
- "I captured this hot couple f\*\*king in AirBNB" (**7.2K views**)
- "Spycam recording of naked young MILF on her gyno exam" (**631.8K views**)

#### XNXX

- "Young girl fitting bra in shopping mall" (**848.2K views**)
- "Real hooker from Korea caught on hidden camera" (**3.4M views**)
- "Spy camera in my college classmate's bathroom" (**461.2K views**)
- "Stepdaddy installed a spy cam" (**562.9K views**)
- "Hidden Cam In Massage Parlor" (1.1M views)
- "I PUT A SPY CAMERA IN MY NEIGHBOR'S BATHROOM" (**1.2M views**)
- "Spy cam in the AIRBNB caught gorgeous arab girl in niqab masturbatng (sic) in the shower" (**2.255M**)
- "Spy cam in locker room films female bodies" (**590.3K**)



Figure 3. Example of XVideos IBSA Video with View Count, Download, and Sharing Features<sup>88</sup>

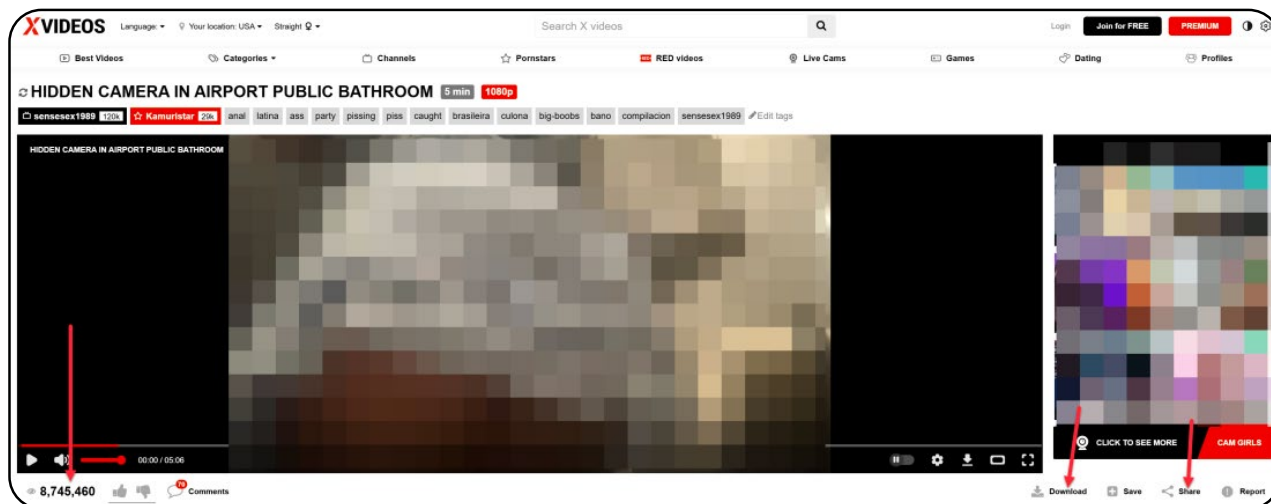
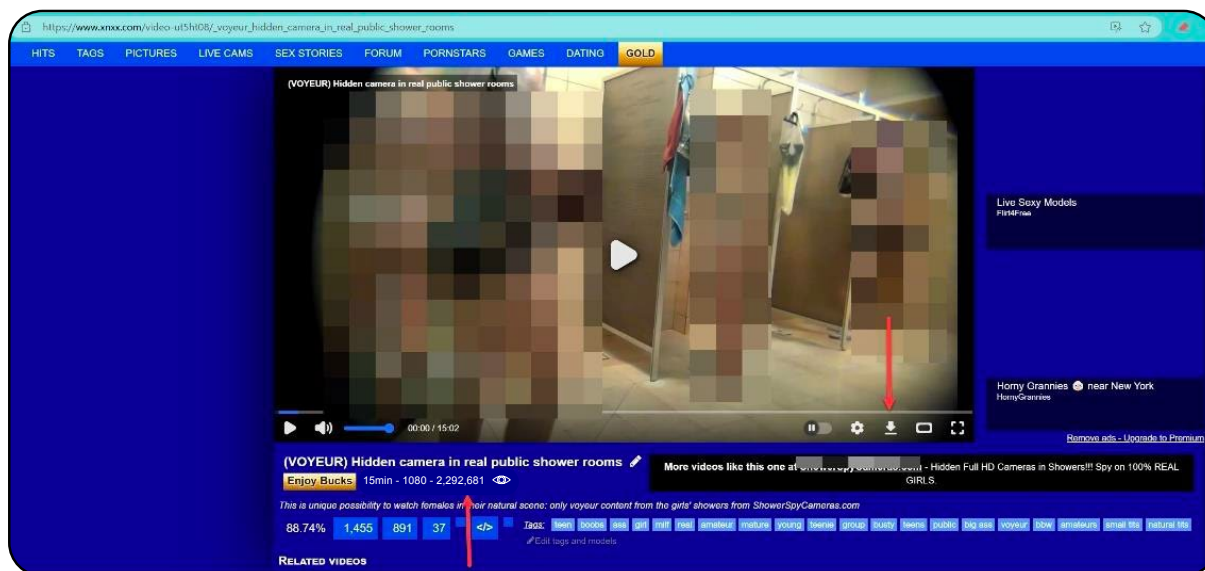


Figure 4. Example of XNXX IBSA Video with View Count and Download Feature<sup>hh</sup>



<sup>88</sup> Screenshot captured February 5, 2025. Images redacted by NCOSE.

<sup>hh</sup> Screenshot captured February 6, 2025. Images redacted by NCOSE.

Figure 5. XVideos Search Results for "Without Consciousness"<sup>ii</sup>

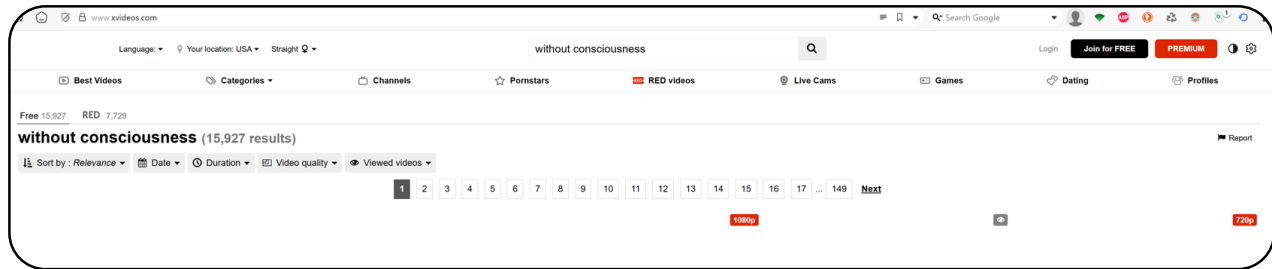


Figure 6. XVideos Search Results for "She Won't Know"<sup>jj</sup>

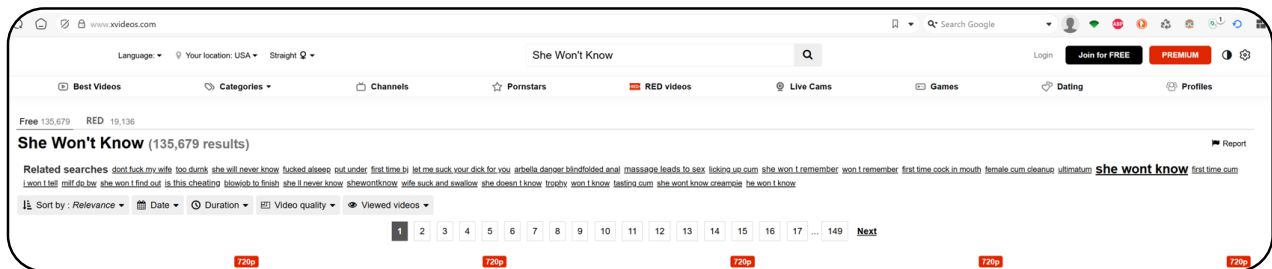


Figure 7. XVideos Search Results for "Blacked Out"<sup>kk</sup>

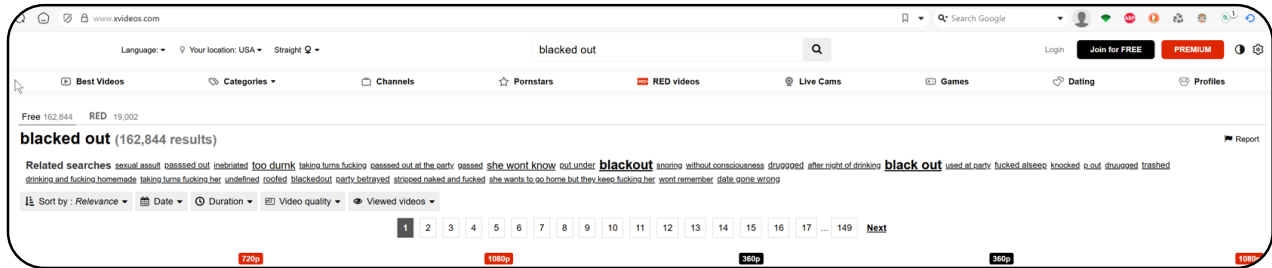
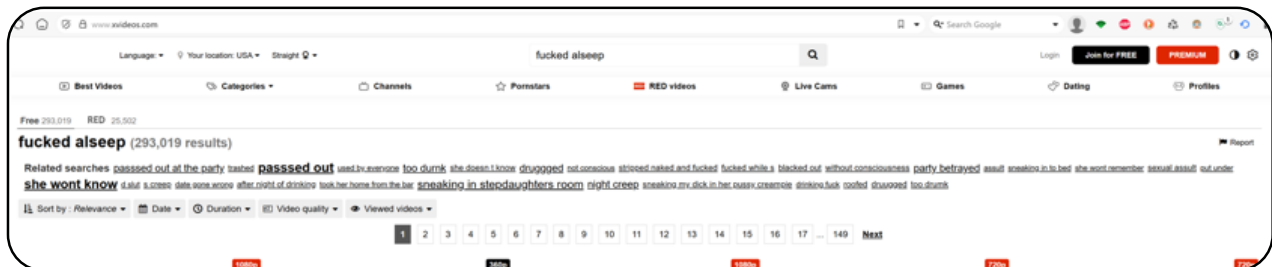


Figure 8. XVideos Search Results for "F\*\*ked Alseep"<sup>ll</sup>



<sup>i</sup> Screenshot captured February 5, 2025.

<sup>ii</sup> Screenshot captured February 5, 2025. Related search terms were "dont f\*\*k my wife," "too drunk," "she will never know," "f\*\*ked asleep," "put under," "first time bj," "let me suck your d\*\*k for you," "arbella danger blindfolded anal," "massage leads to sex," "licking up c\*m," "she won t remember," "won t remember," "first time cock in mouth," "female c\*m cleanup," "ultimatum," "first time c\*m," "i won t tell," "milf do bw," "she won t find out," "is this cheating," "blowjob to finish," "she ll never know," "shewontknow," "wife suck and swallow," "she doesn t know," "trophy," "won t know," "tasting cum," "she wont know creampie," "he won t know."

<sup>kk</sup> Screenshot captured February 5, 2025. Related search terms were "sexual assault," "passed out," "inebriated," "too drunk," "taking turns f\*\*king," "passed out at the party," "gassed," "she wont know," "put under," "blackout," "snoring," "without consciousness," "drugged," "after night of drinking," "used at party," "f\*\*ked asleep," "knocked," "p out," "drugged," "trashed," "drinking and f\*\*king homemade," "taking turns f\*\*king her," "undefined," "roofed," "blackedout," "pary betrayed," "stripped naked and f\*\*ked," "she wants to go home but they keep f\*\*king her," "wont remember," "date gone wrong."

<sup>ll</sup> Related search terms were "passed out at the party," "trashed," "passed out," "used by everyone," "too drunk," "she doesn t know," "drugged," "not conscious," "stripped naked and f\*\*ked," "blacked out," "without consciousness," "party betrayed," "assault," "sneaking in to bed," "sex wont remember," "sexual assault," "put under," "she wont know," "d slut," "date gone wrong," "after night of drinking," "took her home from the bar," "sneaking in stepdaughters room," "night creep," "sneaking my dick in her p\*\*y creampie," "drinking f\*\*k," "roofed," "drugged," and "too drunk."



## Part VIII: How The Pornography Industry Fuels IBSA (Continued)

In Table 2 above, of the world's four largest pornography platforms, xHamster appears to be yielding the fewest results for IBSA-related search terms. However, xHamster provides drop down menu lists of terms from search bars by which users can find IBSA-themed pornography channels. Examples are provided in Figures 9 and 10 below.



Moreover, data from a review of a random sample of 200 cases of image-based sexual abuse handled by the UK's Revenge Porn Helpline sheds additional light on xHamster's role in IBSA.<sup>147</sup> Of the 200 cases, 79 contained distribution method information. In 52% of those cases, the material was distributed via social media<sup>oo</sup> and in 45% via public URLs. Further analysis found that the URLs were to pornography sites (42.5%), forums for anonymous sexual content sharing (18%), websites which openly host IBSA (8%), escort websites (5.23%), "desi" pornographic platforms (2.7%),<sup>pp</sup> file sharing sites (0.9%), and 22.3% of websites were no longer accessible.<sup>148</sup> What is especially noteworthy, was that of cases where URL data was present, xHamster was the most used domain to share IBSA material. In fact, 8,539 IBSA images were to xHamster's domain and accounted for nearly 50% of the total images shared.<sup>150</sup> The next highest domain had 940 images and of the top twenty most had under 200.<sup>151</sup>

Figure 9. xHamster Upskirt Titled Pornography Channel with 11.7 Million Views<sup>mm</sup>

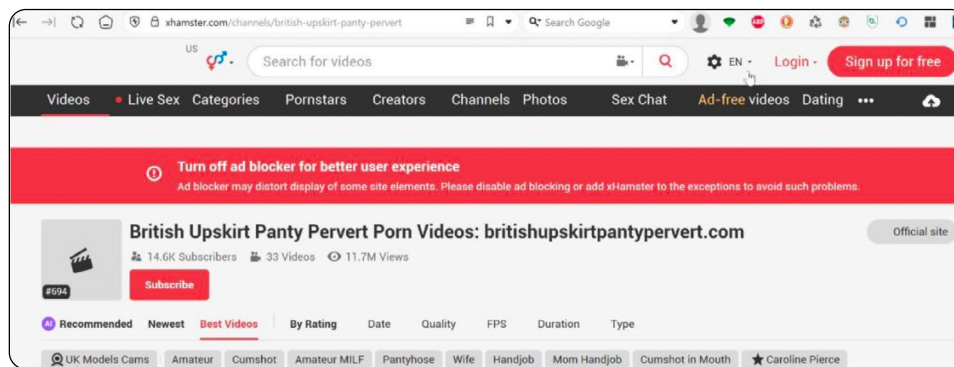
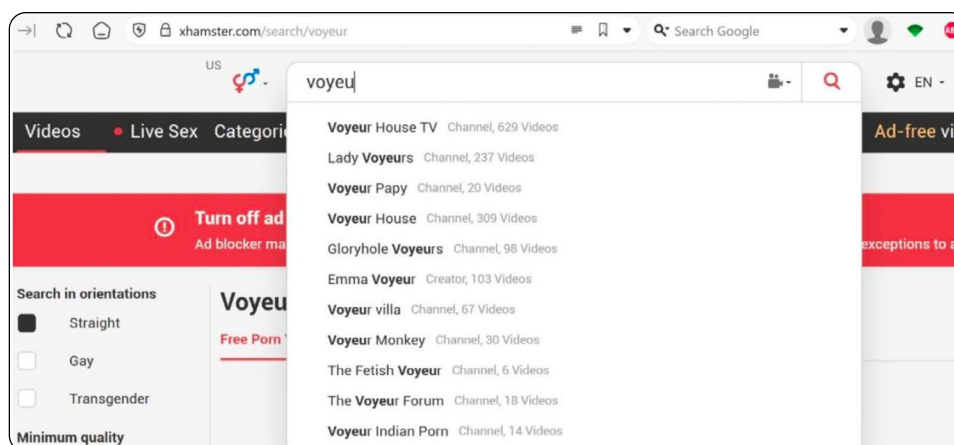


Figure 10. xHamster Drop Down Recommendations of Voyeur Themed Pornography Channels<sup>nn</sup>



<sup>mm</sup> Screenshot captured February 20, 2025.

<sup>nn</sup> Screenshot captured February 20, 2025.

<sup>oo</sup> This study included OnlyFans in its categorization of social media companies. We believe it is more accurate to categorize OnlyFans as a pornography platform. See Culture Reframed, *OnlyFans is Only Porn: The Online Ecosystem of Webcamming and OnlyFans*, n.d., [https://culturereframed.org/wp-content/uploads/2023/04/culture-reframed-whitepaper\\_022023\\_draft2.pdf](https://culturereframed.org/wp-content/uploads/2023/04/culture-reframed-whitepaper_022023_draft2.pdf).

<sup>pp</sup> Combining their categorizations of "pornography websites" and "desi" pornography platforms brings the total of pornography sites to 45.2%.

Pornhub: Still Normalizing IBSA

In December 2020, Pornhub was hosting about 13.5 million videos.<sup>152</sup> That month, *The New York Times* (NYT) published an opinion piece that generated outrage over flagrant cases of child sexual abuse material (CSAM), as well as prolific IBSA material, on the site.<sup>153</sup> Thus, the open secret was officially exposed: Pornhub's unverified user uploads, coupled with its grossly inadequate moderation process, had allowed countless millions to freely view and download IBSA material and videos of children being sexually abused.

In the aftermath of the NYT piece, as well as advocacy and private briefings from subject matter experts and survivors instigated by the National Center on Sexual Exploitation, Visa and Mastercard stopped processing payments to Pornhub and launched investigations into their financial ties with MindGeek, Pornhub's parent company at the time.<sup>154</sup> Following the actions of Visa and Mastercard, Pornhub removed 10.6 million unverified videos—nearly 80% of its content—from its site.<sup>155</sup>

This, however, has not resolved the problem of abuse material on its site. Despite "warning messages" on the Pornhub website for some IBSA-related terms, as of February 2025, Pornhub continues to return results for many terms associated with IBSA and pirated material. Thus, Pornhub continues to socialize its users to view IBSA (whether real or staged) not as abuse, but as normative sexual behavior.

For instance, terms such as "Exgf" and "Exgirlfriend" signal the possible nonconsensual sharing of sexually explicit material featuring the ex-girlfriends of the uploaders. Other search terms such as "real voyeur," "toilet voyeur," and others (see Table 2) normalize video voyeurism, a form of IBSA. As recently as February 2024, a search on Pornhub for "real voyeur" and "toilet voyeur" yielded lists of additional search terms to help their users in their quest to find IBSA-themed material (see Figures 11 and 12).

Figure 11. Feb 2024 Pornhub "Real Voyeur" Related Search Suggestions

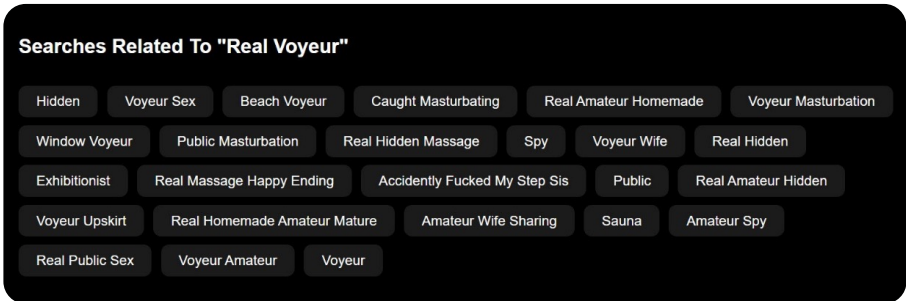


Figure 12. Feb 2024 Pornhub "Toilet Voyeur" Related Search Suggestions

(Note: Some recommended terms in "toilet voyeur" redacted.)



Voyeurism and Pornography

As defined by the American Psychological Association, voyeurism is "a paraphilia in which *preferred or exclusive* sexual interest and arousal is focused on observing unsuspecting people who are naked, in the act of undressing, or engaging in sexual activity" (italics emphasis added).<sup>156</sup> Voyeurism is a major theme of Internet pornography—a theme to which entire pornography websites have been devoted. For instance, in 2003 Hughes provided analysis of "VoyeurDorm.com," a subscription website to which members paid to watch women eating, sleeping, showering, dressing, and using the toilet.<sup>157</sup> There is a sense in which any pornography viewing is voyeurism. In psychological terms this is referred to as "scopophilia"<sup>158</sup>—that is deriving sexual pleasure from watching others in a state of nudity, undressing, or engaging in sexual activity.

<sup>158</sup> "Scopophilia" is from the Greek meaning "love of looking."

## B. The Pornography Industry Actively Shapes the Sexual Appetite for IBSA

More than conditioning their consumers to find IBSA sexually arousing by its mere availability on their platforms, **the pornography industry actively shapes its users' attraction to specific sexual material.**

Here it is critical to understand that modern distributors of pornography are information technology experts.<sup>159</sup> For example, pornography industry tech moguls are credited with a wide range of advances in “web technologies and online business practices, such as hosting services, live chat, secure credit card processing, banner advertisements, pop-ups, web promotions, mouse-trapping (which prevents users from leaving a site), and streaming video technology.”<sup>160</sup>

The pornography industry “**is now led by a secretive group of experts on algorithms, search engine optimization and targeted advertising.**”<sup>161</sup> (bold emphasis added)

Patricia Nilsson | *The Financial Times*

Their technological prowess does not stop there. **Two major design strategies enable them to guide the sexual interests of their users and to increase their users time on site: algorithmic categorization and immersive viewing experiences.**<sup>162</sup> These design strategies work in tandem—the longer a user is on a pornography site due to an engaging interface, the more data their views produce.<sup>163</sup> The pornography website harvests the new data generated by a user’s visit, allowing it to more deeply curate the future viewing experiences of the user, thereby likely increasing the user’s time on its site.

**This advanced technological prowess allows pornography websites to mine user data at the “deepest level” compared to other tech giants like Amazon, Facebook, Google, Netflix, and Amazon.**<sup>164</sup> Via a process called “data-driven creativity,” Aylo (i.e., the company formerly known as MindGeek and the parent company of many pornography sites such as Pornhub, YouPorn, RedTube, and Tube8) harvests intricate details regarding the types of content viewers have previously viewed to provide them with “**tailor-made**” content that fulfills their “exact tastes—even down to the color of the furniture.”<sup>165</sup> Thus, when pornography users consume IBSA-themed material on pornography websites, the sites are designed to further fuel that desire based on the user’s past viewing history.

“... the industry does not merely respond to consumer demand, it actively crafts it and in its pursuit, it works to circumscribe consumer choice.”<sup>166</sup> (bold emphasis added)

Jennifer Johnson | *Ph.D. Virginia Tech*





## Pornography Use Shapes and Changes Sexual Tastes

- "The graphical interface of pornographic video streaming sites reveals **the organization of pornographic content as a cultural value system that structures and regulates individuals' sexual desires.**"<sup>167</sup>

- "Imaginations are limitless, but they can be fed . . . there is such a thing as a sexual meme, 'fantasies that replicated and spread like wildfire,' and typing it into search engines **alters the sexual universe both in terms of what it provides and what people can sexualize.**"<sup>168</sup>

- " . . . once fantasy . . . matches an observable sexual scenario, the viewer immediately discovers that he is not alone. The same clip might have been watched by thousands of others who rate it with a like or dislike. As a result, **the most obscure sexual practices and fantasies become not only available but also normalized.**"<sup>169</sup>

- " . . . the design of **pornographic streaming sites** works as a disciplinary regime that **structures and regulates sexual desire** to fit within the context of algorithmic categorization."<sup>170</sup>

- In a survey of 434 men involved in online sexual activities (OSA), by far the most common activity was viewing pornography (99%). The same survey found that **47% of men were involved in practice or searched for pornography which previously was not interesting to or even disgusted them.**<sup>171</sup>

- A nationally representative study of Americans aged 18 to 60 reported that both **past-year frequency** and **lifetime range of pornography use** was associated with an **increased likelihood of engaging in dominant sexual behaviors** (e.g., ejaculating on someone's face; choking someone during sex) and having been a target of such behaviors.<sup>172</sup>

- A German study found that **more frequent, but not necessarily addictive pornography use**, was associated with negative structural and functional changes in the brain, including **1) reduced gray matter, 2) decreased reward circuit activation when viewing pornography, indicating possible tolerance, a known vulnerability for addiction, and 3) less functional connectivity between the reward system and the prefrontal cortex.**<sup>173</sup> Thus, this study showed that frequent and regular pornography users have smaller reward systems compared to those who use pornography seldom or irregularly. **The findings also suggest that "subjects with high pornography consumption require even stronger stimuli to reach the same reward level."**<sup>174</sup>



**"In a survey of men involved in online sexual activities, 47% reported being involved in practice or seeing pornography which previously was not interesting to or even disgusted them."**

2. Industry Profiteering—the “Free” Pornography Profit Model

While it may seem illogical, the ubiquity of free pornography is the foundation of the modern pornography industry’s profit model. Researchers have explained it this way:

... the proliferation of free pornography has massively expanded the audience for adult content. Most people who consume free pornography are casual consumers, and remain so. But the ubiquity of free content creates a relatively small but absolutely large number of consumers who become aficionados. Some of these people are willing to spend hundreds or even thousands of dollars to purchase a personalized adult video tailored to their individual taste.<sup>175</sup>

The **enormous traffic** generated by the availability of free pornography videos **drives revenue from advertisers** of camming and social media subscriptions, as well as of “premium content”<sup>176</sup> such as subscription sites and á la carte purchases.<sup>177</sup>

Thus, the Internet pornography industry’s profit model is, in part, dependent upon the **proliferation of free, user-generated material**, which was ushered in by YouTube-inspired websites like Pornhub, XVideos, and xHamster.

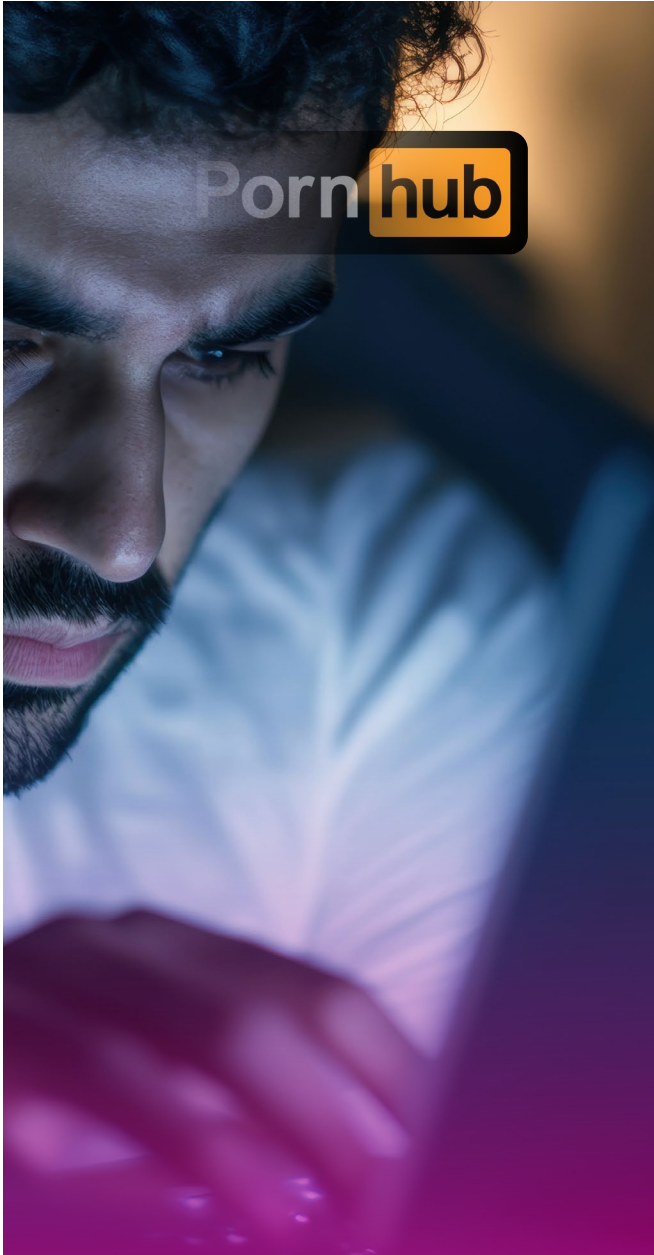
### MindGeek Past Profits

Little information is available about how much money has been made by companies like MindGeek (now Aylo). Here is what little we know about MindGeek:

Former MindGeek CEO Feras Antoon testified before a committee of Canada’s House of Commons that **approximately 50% of the company’s profits derived from advertising.**<sup>178</sup>

**MG Billing Ltd, one of MindGeek’s many entities**, collected subscriptions from premium subscribers which reportedly generated **\$1.3 billion in revenue between 2012 and 2018**, and was responsible for total revenues of **\$220.9 million in 2018—a weekly average of \$4.2 million.**<sup>179</sup>

MindGeek reported revenues of **\$460 million in 2018.**<sup>180</sup>



**Table 3. Worth of Web EstimatesTop Internet Pornography Distributors Revenue & Worth<sup>rr</sup>**

The financial picture of the world’s top pornography distributors is very unclear as they are privately owned and have complex corporate structures. The [WorthofWeb.com](#) estimated values of top pornography distributors are provided in Table 3 below.<sup>181</sup>

	XVideos	Pornhub	xHamster	XNXX
Annual Revenue	\$4.78 M	\$4.68 M	\$4.68 M	\$3.12 M
Website Worth	\$4.330 B	\$4.200 B	\$3.332 B	\$2.792 B

<sup>rr</sup> Table created from data compiled from [WorthofWeb.com](#) February 12, 2025.

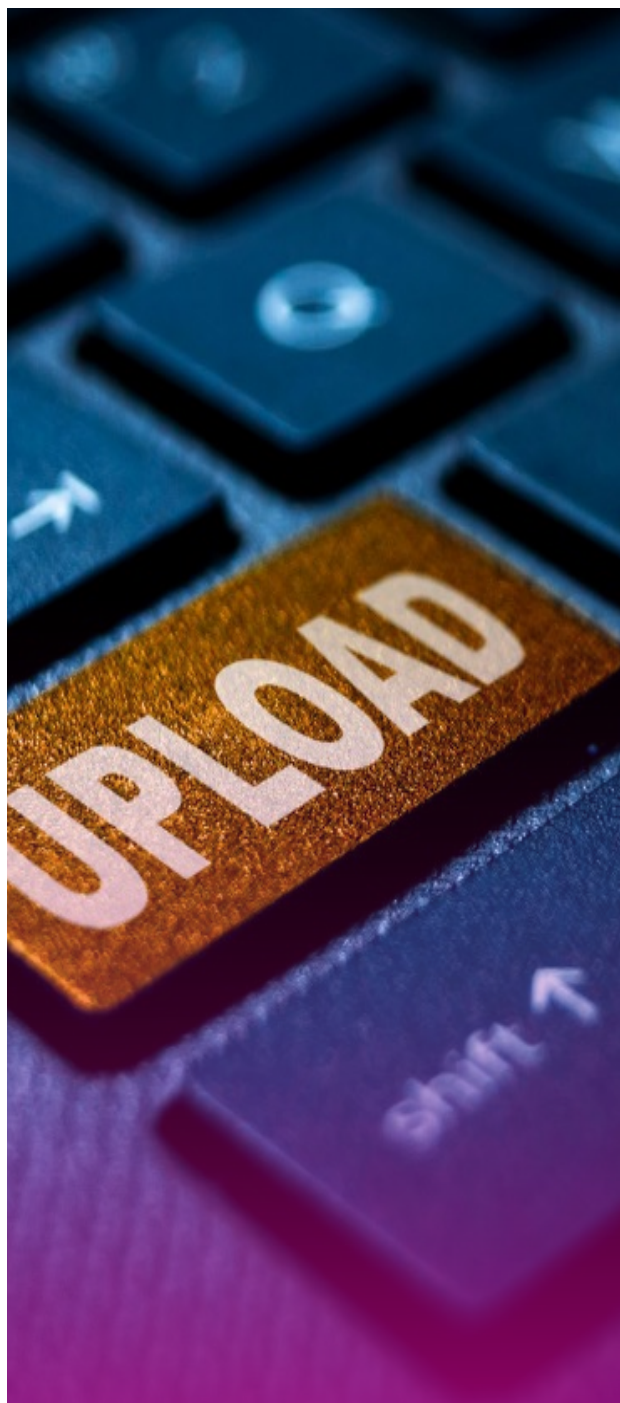
Some insight into the scale of the massive flood of content available on online pornography tube sites is demonstrated in Table 4 below, which presents data from Pornhub.

It is not possible to know what percentage of the millions of pornography videos uploaded to Pornhub each year were by industry pornography producers versus anonymous uploaders, because Pornhub did not provide disaggregated data.<sup>55</sup> Nevertheless, the **staggering numbers of uploads testify to the company's heavy dependence on user-generated content. Moreover, Pornhub's removal of its unverified content—which comprised 80% of its corpus**<sup>182</sup>—following the controversy sparked by the NYT exposé, revealed that the vast majority of its content was not industry produced.

This is important because **free, unverified pornography—of which IBSA was an intermingled component—is what attracted people to pornography tube sites like Pornhub.** The volume of this traffic, in turn, attracted advertisers and entities seeking affiliate relationships, and is what made Pornhub, as well as XVideos, XNXX, and xHamster the titans of online pornography they are today.

**Table 4: Pornhub Total Reported User-Uploaded Videos**<sup>183</sup>

	Year	Videos Uploaded	Percent Increase	Blocked or Removed Videos
<i>Pre The New York Times Exposé</i>	2017 <sup>tt</sup>	4.05 million	Not available	Not available
	2018	4.79 million	18%	Not available
	2019	6.83 million	43%	Not available
<i>The New York Times Exposé Dec 2020<sup>uu</sup></i>	2020	Not available	Not available	10.6 million
<i>Post The New York Times Exposé</i>	2021	1.96 million	Not available	108,734
	2022	2.18 million	11.22%	89,533
	2023	2.31 million	5.96%	287,958
	2024	1.65 million	-28.57%	120,627



<sup>55</sup> Pornhub's *Year in Review* reports for 2013-2016 did not provide data on the number of videos uploaded to the site. A 2015 research study reported 209 producer accounts and 8 Pornhub staff accounts out of 563,000 profiles on the platform; see Tyson et al. at endnote 113.

<sup>tt</sup> In 2017, the company reported 810,000 "amateur" videos among its total video uploads. How they defined "amateur" is unknown.

<sup>uu</sup> Following the December 2020 opinion column in *The New York Times* regarding CSAM and IBSA on Pornhub's platform, Pornhub published a truncated version of its usual annual report that omitted data on user uploads in 2020.



### 3. Disregard for Existing Law Regarding Age and Identity Verification: 2257 Regulations

To ensure that minors are not used in the production of pornography, the US Congress in 1988 passed the Child Protection and Obscenity Enforcement Act, creating a legal requirement that pornography producers obtain proof and maintain records documenting the age of any person filmed in pornography. The guidelines created by the US Department of Justice to enforce this law are popularly referred to as "2257." While the Supreme Court struck down the initial provisions in 1989, Congress subsequently amended 2257 provisions. Despite additional legal challenges, 2257 requirements still stand and apply to "secondary producers"—those who publish, reproduce, or reissue pornography.

In disregard of this law,<sup>vv</sup> pornography tube sites like Pornhub and XVideos **for more than a decade allowed uploading of pornography to their platforms without verification of the age or identity of those depicted.**<sup>184</sup> This not only permitted but normalized the sharing of IBSA on their platforms.

Despite changing its policy in 2020 so only content partners and those within its "Model Program" could upload content to its platform,<sup>185</sup> an undercover investigation into Pornhub revealed a loophole which continued to allow some sexually explicit material to be uploaded without age and consent verification. Specifically, in 2023, a MindGeek employee told an investigator that **Pornhub did not verify the identities of persons in user-uploaded videos that do not show their faces and admitted that rapists and sex traffickers use this loophole.**<sup>186</sup>

Similarly, multiple employees of MindGeek's (Aylo's) advertising arm TrafficJunky stated that **TrafficJunky did not require identification of persons or consent verification of people featured in "creatives."**<sup>187</sup>

#### MindGeek Employee: "We Don't Know Where This Stuff Comes From"

"But we weren't very careful in like, 'Okay, well, what is this video, you know?' It'd be like voyeur video from the beach and stuff like that. It's like, you don't know who that is. We don't have consent of that person and we're running ads. **As a business we're monetizing content that we don't know where this comes from, we don't know who's on that video,** we don't know the age of the person on the video. They look 20. They could be 16, you know? Like, how do you know the difference between a 20-year-old and a 16-year-old nowadays, you know? . . . You could upload a video of anything, and it would just go through. No one gave a s\*\*t."<sup>190</sup> (bold emphasis added)

Mike Farley, Technical Product Manager | MindGeek  
Sound Investigations, Sept 20, 2023



Mike Farley, former MindGeek employee in undercover video recorded by Sound Investigations, tells investigators about "faceless" loophole. See <https://www.youtube.com/watch?v=HzPUra6jqLs>.

<sup>vv</sup> The pornography industry's litigation group, the Free Speech Coalition, Inc., and others sued the US Attorney General in an effort to overturn this common-sense law passed by Congress to protect minors from sexual exploitation within the pornography industry. During the ongoing litigation there was a nationwide injunction against the enforcement of 2257. Online pornography distributors thus blithely disregarded the law. If pornography distributors were responsible actors, they would have complied with the law instead of using the injunction as a permission slip to not bother with verifying the ages of those depicted in the material they distributed globally.

Following the investigation, a pornography trade industry publication reported that an Aylo spokesperson stated the reports about TrafficJunky were “asinine.”<sup>188</sup> Since December 2020, Aylo has implemented some measures to reduce the risk of IBSA and CSAM being uploaded to its site, but its past track record necessitates strict and ongoing scrutiny of its business practices. While its refutation of the investigation into TrafficJunky claimed it had “policies” that require advertisers to meet 2257<sup>189</sup> requirements, the following statements made by Pornhub “employees”<sup>www</sup> indicate that such policies were unknown to them.

### MindGeek Employee Expounds on the Company's View on “Revenge” Pornography

“Revenge porn: They didn’t give a f\*\*k.”<sup>191</sup>  
(bold emphasis added)

Sean Morrier, Senior Software Engineer | *MindGeek*  
Sound Investigations, November 29, 2023



### MindGeek's TrafficJunky Representatives Explain the Company's Identification and Consent Process for Advertising: “We Don’t Require That”

**Journalist:** Do we need identification or documentation for the models that are used in the creatives that will, you know, eventually be seen on, you know, as pre-rolls let's say?

**Manuel:** (TrafficJunky Customer Support Line): Actually, no. **No . . . For the models we don't need, or it doesn't have any requirements to be submitted here in TrafficJunky.**

**Journalist:** What about documentation that they have consented to the video or to the creative?

**Manuel:** Actually, ah, those parameters, **we don't require that, as well.**<sup>192</sup> (bold emphasis added)

Manuel | *TrafficJunky Customer Support Line*  
Sound Investigations, November 29, 2023

**Tony:** **We won't ask you before you uploaded the pictures if you have the consent.** You can upload them. My advice would be that you get the consent, that would be ideal. But if you're still uploading the creatives, **I mean, we cannot stop you from advertising the pictures or the videos, right.**

**Journalist:** Yes.

**Tony:** Because we don't have the, we don't know if you already have the consent or not. . . . **The legality of your activities, of your content, that's something that we won't really ask you** unless it's, say, something like cannabis or something like that, you know. . . . **We in the end won't call the cops on you if that's what you want to know.**<sup>193</sup> (bold emphasis added)

Tony | *TrafficJunky Customer Support Line*  
Sound Investigations, November 29, 2023

<sup>www</sup> Aylo's defense of the statements made by TrafficJunky customer service representatives was to characterize these individuals as agents of third-party call centers who should not be required to “demonstrate expertise in robust and complex trust and safety policies.” See Michael McGrady, Jr., “Pornhub Tapes' Group Continues Targeting TrafficJunky,” *Adult Video News*, November 3, 2023.

#### 4. Anonymous User Uploads and Lack of Robust Content Moderation

Pornography tube sites' failure to verify identity also extended to the third parties uploading the material. For instance, beginning with its launch in 2007 and continuing until December 2020, **Pornhub** allowed unidentified users to create accounts and upload pornography to its site.<sup>194</sup>

A 2015 study provides a glimpse into the scale of the problem. The study, which investigated social networks on Pornhub with data harvested from the platform in 2013, found that of 563,000 user profiles it identified on the site, **99.3% were set up without any "prerequisites" such as identity verification or payment.**<sup>195</sup> **Only 0.005% of the accounts had been "verified" by Pornhub!**<sup>196</sup>

Similarly, **XVideos** allowed anyone who registered with an email address to upload pornography to its platform until the end of 2021,<sup>197</sup> and as recently as October 2022, a pornography industry insider reported that they had easily set up an untraceable fake account on XVideos within approximately 45 seconds, and uploaded pornography which went live on the site within 12 minutes.<sup>198</sup> In October 2020, journalists revealed that anyone could anonymously create and upload videos to **xHamster** and that volunteer content moderators, who received no pay or training, **ignored hidden camera, voyeur, and upskirt (IBSA) photos on the site.**<sup>199</sup>

##### IBSA Distribution Via Download

A button on the Pornhub website allowed users to **download material** from its site, facilitating the mass distribution of IBSA (and CSAM) material to its users.<sup>200</sup> Even if such material was reported—and after many appeals from victims was removed—it was commonly reuploaded to the website.<sup>201</sup> In 2023, subscribers to Pornhub Premium were still able to download most Pornhub content.<sup>202</sup> However, as of March 2025, this no longer appears to be the case.<sup>203</sup> Further, as Figures 3 and 4 above demonstrate, **XVideos and XNXX continue to allow video downloads of pornography from their sites.**

This, coupled with grossly inadequate moderation on their platforms, has allowed IBSA and other exploitative content to flourish on pornography websites. Pornhub provides a prime example of this failure.

In testimony given before a committee of the Canadian Parliament in 2021, then MindGeek CEO Feras Antoon made the astonishing claim that **"every piece of content is viewed by our human moderators."**<sup>204</sup>

**Such a claim defies common sense.**

In 2019, Pornhub alone (just one of MindGeek's distribution platforms) reported that **6.83 million new videos** were uploaded to its site that year.<sup>205</sup> Are we to believe that MindGeek employed sufficient human moderators to review all this material for abuse before it was uploaded? The company's unwillingness to disclose how many moderators it employed<sup>206</sup> greatly detracted from the claim's veracity.

Antoon's claim also did not align with statements from former employees who reported that they were expected to review an overwhelming number of videos (as many as 1,200 a day<sup>207</sup>) that they did not watch videos from start to finish, and that managers favored approving questionable videos rather than removing them. Other employees told undercover investigators that Pornhub had an insufficient number of moderators and did not take moderation seriously.<sup>208</sup> Moreover, former MindGeek Chief Operating Officer David Tassillo admitted that **not all videos are reviewed with the sound on,**<sup>209</sup> a key element for reliable content moderation.



Feras Antoon, now the former CEO of MindGeek, testifying on February 5, 2021, before committee of the Canadian Parliament, <https://parlvu.parl.gc.ca/Harmony/en/PowerBrowser/PowerBrowserV2?fk=11109629>.

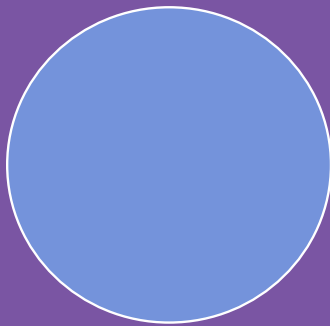


### The Gristmill of Content "Moderation" at Pornhub

"I was a moderator. I worked for less than two years. Some of the moderation happened in Canada. Most of it happened in Cyprus. . . . Every moderator had to review, um, 700 videos per day, **but it was expected for us to do more.**" (bold emphasis added)

*Former MindGeek moderator* <sup>211</sup>

*The New York Times* has reported that Pornhub's total moderation staff was about 80 worldwide.<sup>212</sup> In contrast, Facebook employs about 15,000 inhouse and outsourced content moderators.<sup>213</sup>



Facebook | 15,000



MindGeek | 80

Antoon's claim is also belied by evidence (obtained via discovery in an ongoing lawsuit against MindGeek/Aylo) which gives insight into the company's protocols for dealing with "flagged" content. "Flagging" is a process by which users and moderators of MindGeek sites like Pornhub may report material that they have seen on the platform which potentially violates the site's terms of service. Released internal MindGeek emails (see Figures 13 and 14) from May 2020 showed that while **706,425 videos on the site had been "flagged" as containing potentially abusive content between one to 15 times, a flagged video was only reviewed if it obtained more than 15 flags!**<sup>214</sup> Of videos with more than 15 flags, only **approximately 5% were removed.**<sup>215</sup> The disclosure of such negligible standards demonstrates Pornhub's gross dereliction of responsibility towards survivors of sexual abuse and exploitation violated on its platform.



Figure 13. MindGeek Email #1, "RE: Privileged and Confidential – Video Flags"<sup>216</sup>

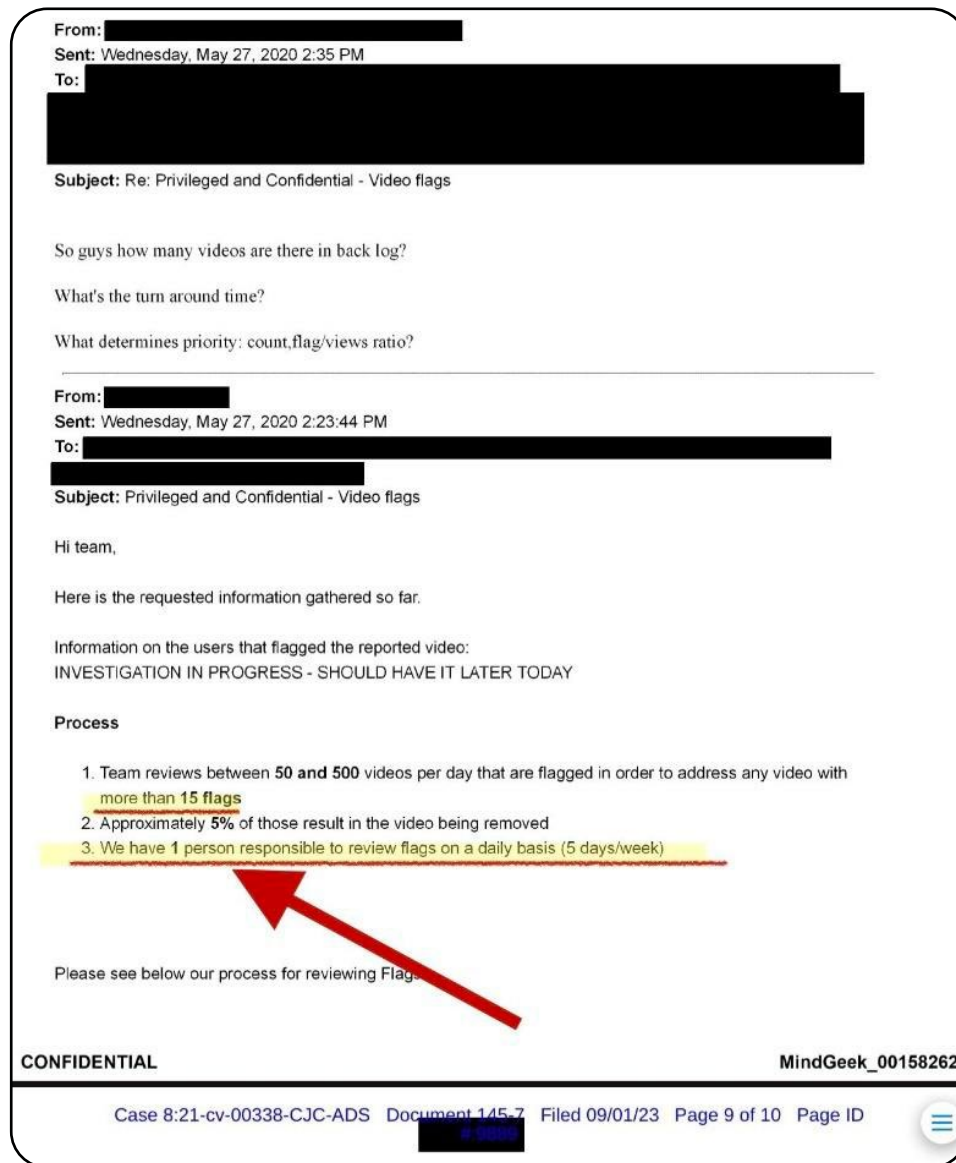
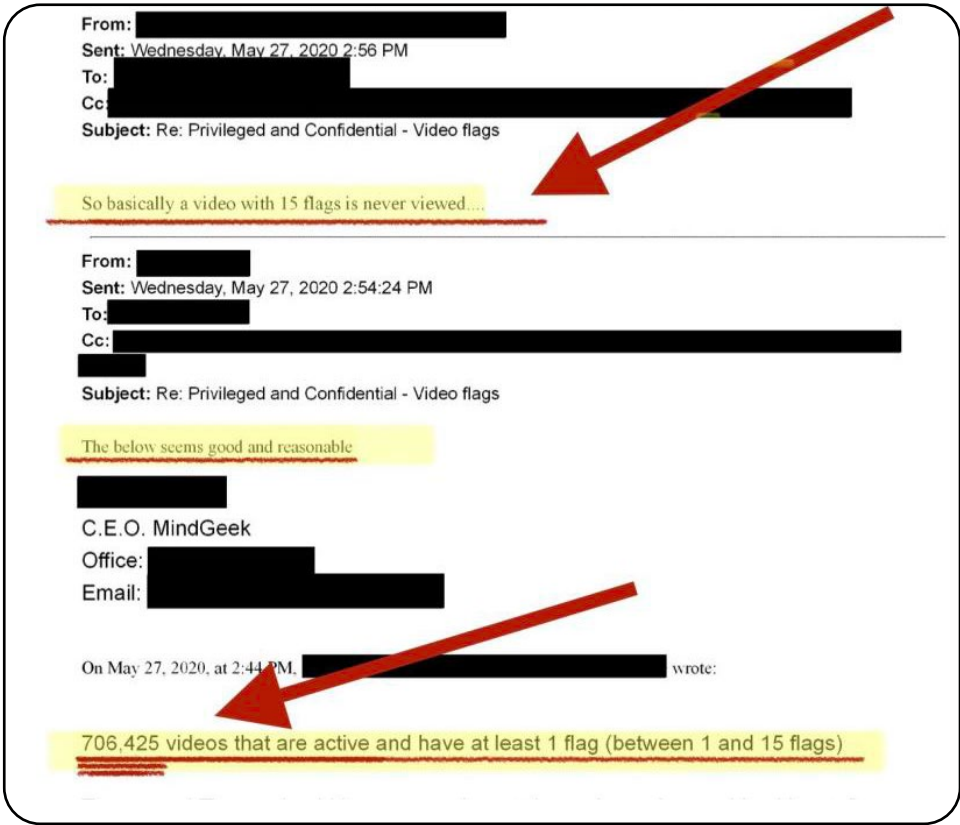


Figure 14. MindGeek Email #2, “Privileged and Confidential – Video Flags”



In 2020, 706,425 MindGeek videos flagged as containing potentially abusive and exploitative content were not reviewed, and 95% of videos with more than 15 flags were approved. Four years later, Pornhub reported that 73% of the non-consensual pornography it removed from its platform **was reported by users, versus only 26.97% due to internal detection**. This highlights how, despite moderation efforts, **the majority of the burden for detection of IBSA on its platform has been shouldered by survivors and Pornhub users.**<sup>217</sup>

Table 5: Removal of Nonconsensually Distributed Pornography as Reported in 2023 – 2024 Pornhub Transparency Reports

	Jan – July 2023	July – Dec 2023	Jan – June 2024	July – Dec 2024
Total number of nonconsensually distributed pieces of material removed for violation of Pornhub policy	4,449	3,899	8,549	3,757
Percentage identified by users	73.03 <sup>xx</sup>	78.59	72.76	11.96 <sup>yy</sup>

<sup>xx</sup> Pornhub’s 2023 Transparency Report (First Half) provides two percentages pertaining to the amount of material that was identified by its users versus its internal moderation efforts. We report the figure that pertains to the removal of content uploaded within the January 1 – June 30, 2024 period. The same holds true for Pornhub’s 2024 transparency reports, and therefore, for the data we report in the later time periods included in this table.

<sup>yy</sup> This marks an extraordinary increase in Pornhub’s internal detection of IBSA and is highly inconsistent with past trends. We hope that this change has been enabled by improved internal processes at Pornhub and is not an anomaly.



### **A Decade and Half Too Late but Better than Never**

In January 2024, roughly 17 years since Pornhub's founding and following a public petition against it spearheaded by Laila Mickelwait of Exodus Cry signed by more than two million people,<sup>218</sup> being kicked off Instagram, YouTube, and TikTok following campaigns by the National Center on Sexual Exploitation and allied NGOs,<sup>219</sup> a devastating series of exposés by Sound Investigations,<sup>220</sup> multiple survivor civil lawsuits and more<sup>221</sup>—the company announced that it would at long last implement proof of consent for all persons in pornography videos uploaded to its site.<sup>222</sup> This verification is reported to include a third party identity verification system for the account holder, and submission of co-performers' IDs and proof of consent such as signed release forms.<sup>223</sup> Unfortunately, Pornhub did not commit to removing videos lacking such consent verification uploaded before January 23, 2024, and concerns about significant loopholes—including videos where identity is not readily apparent (e.g., faceless videos), and the ability to forge signatures or for sex traffickers or abusers to coercively obtain signatures—remain.

#### **October 2025 Update**

In September 2025, the Federal Trade Commission and the state of Utah filed a complaint against the operators of Pornhub charging them with deceiving users about efforts to crack down on tens of thousands of videos and photos featuring CSAM and nonconsensual sexual content. The complaint alleged Pornhub failed to review flagged videos, ban users who uploaded CSAM, prevent reuploading of identified CSAM, and review all videos for CSAM or lack of consent before they went live. The proposed order settling these allegations would require Aylo to pay a \$5 million penalty to the state of Utah and establish a program to prevent distribution of CSAM and nonconsensual content, including meaningful age and consent verification and removal of content uploaded prior to implementation of the program.\*

The extent to which other mainstream pornography platforms have implemented serious age, consent, and identity verification processes has yet to be thoroughly investigated.



\*Federal Trade Commission, "FTC Takes Action Against Operators of Pornhub and other Pornographic Sites for Deceiving Users About Efforts to Crack Down on Child Sexual Abuse Material and Nonconsensual Sexual Content," news release, September 3, 2025, <https://www.ftc.gov/news-events/news/press-releases/2025/09/ftc-takes-action-against-operators-pornhub-other-pornographic-sites-deceiving-users-about-efforts>.

## 5. Mass Publicization and Global Trafficking of IBSA

As Table 1 above documents, with **billions of monthly visits and hundreds of millions of unique monthly visitors**, the world's top pornography platforms have an undeniably colossal, global reach. This reach has fueled global dissemination of IBSA material via download options that have previously or continue to be featured on pornography platforms. Thus, at this point in time, once distributed on a pornography platform IBSA becomes impossible to control. In this way, **pornography tube sites act as the world's largest traffickers of sexual abuse and exploitation material**.

**"How do you get your head around 200,000 guys masturbating as you're being assaulted?"<sup>224</sup>**  
(bold emphasis added)

Heather Legarde  
IBSA Survivor

"I did not know the video existed. I found out about it by watching it on Pornhub. In the title of the video, it says I'm sleeping. The tags include 'sleeping' and 'sleeping pills'. Whether I was asleep or drugged is impossible to know after the fact, but what is clear in the video is that I am not conscious and there is nothing to suggest consent. The video is clearly homemade and was uploaded by an anonymous email address. This is the content that the Pornhub moderators supposedly viewed and decided belonged on their porn site. **My video had been uploaded in August of 2017, so by the time I found it, it had been active on Pornhub for over three years, and I had no idea.**"<sup>225</sup> (bold emphasis added)

Witness 1  
IBSA Survivor to the Standing Committee on Access to Information, Privacy and Ethics  
House of Commons  
Canada

In a study of 134 IBSA images found on seven websites specially dedicated to sharing nonconsensually distributed sexually explicit images (i.e., not mainstream pornography tube sites), most images had received approximately 5,000 views. As was noted in the study, "This number is exacerbated when considering that these photos can be copied or downloaded by **each viewer**, and saved or shared on a different website. This creates a situation in which these photos have the potential to spread rapidly through different mediums."<sup>226</sup> (bold emphasis added)

## 6. Facilitation of Serial Sexual Abuse and Exploitation

As explained above, pornography tube sites have, or in some cases continue to, traffic IBSA across the globe, allowing myriad persons to gain access and control over IBSA material. Once disseminated, it is highly unlikely that **IBSA material can be completely erased from the Internet and is impossible to eradicate from all the hard drives of those who downloaded it**. Further, while survivors try valiantly to remove their abuse content from one site, another individual or individuals may be reuploading it or even adding it to additional platforms. Thus, along with the original distributors, **pornography tube sites are culpable for the serial and endless sexual exploitation of IBSA survivors**.



## Download, Take Down, Upload, Repeat

"Because Pornhub previously allowed users to download videos, **anyone could re-upload a clip an endless number of times to any number of tube sites, no matter how many times it was taken down.** This functionality allowed any video, regardless of its content, to essentially **live forever online** . . . ." <sup>227</sup> (bold emphasis added)

Nathan Munn  
*Former Pornography Content Moderator*

"I tried to do damage control on my own. I schooled myself on the Google algorithm, created positive material under my name that would push the negative search results down, filed hundreds of DMCA takedown notices, and started to get to know some of the porn site webmasters so well that one in Russia found a lawyer for me in Miami and offered to buy me dinner the next time he was in the area. After working around the clock for a month straight, writing my dissertation during the day and cleaning up my search results at night, I finally got all of the negative material down. Thank. The. Lord.

**Within two weeks, it was all back up on 300 more websites. I threw in the towel.**" <sup>228</sup> (bold emphasis added)

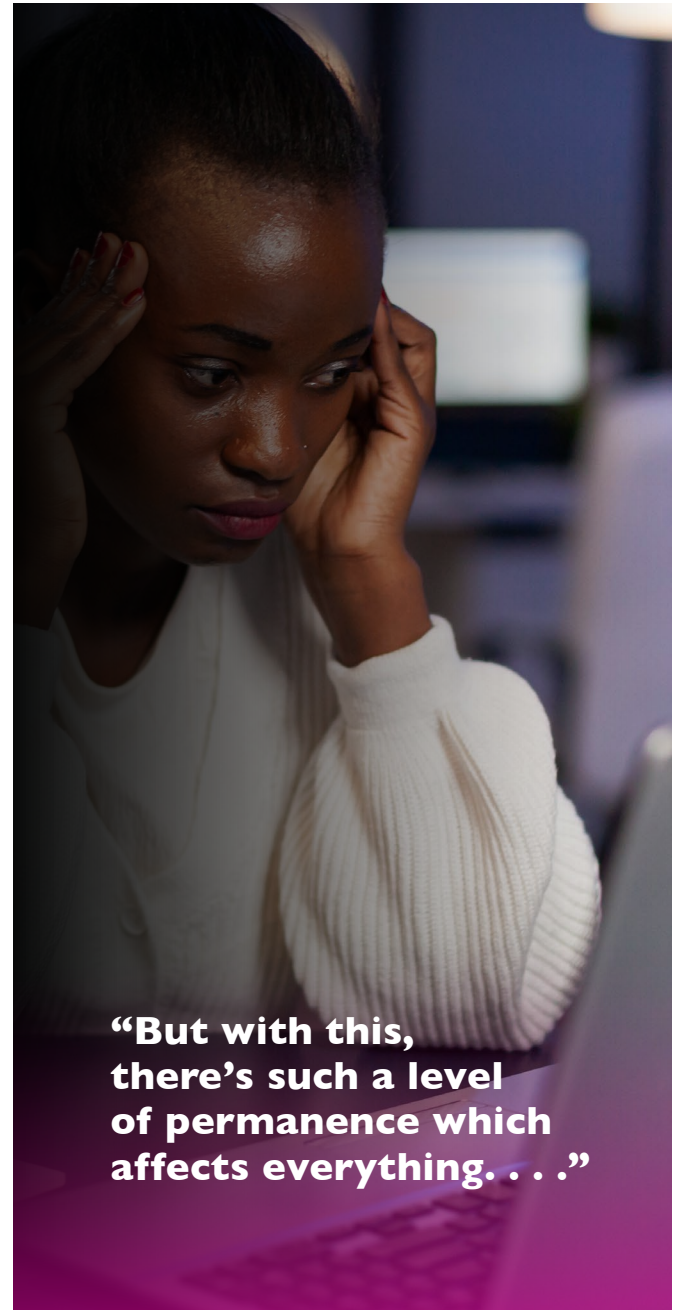
Dr. Holly Jacobs  
*Founder, Cyber Civil Rights Initiative*

"Maybe you could have something happen to you that was traumatic, **but you don't have to necessarily feel like you're defined by it for the rest of your life. But with this, there's such a level of permanence which affects everything** . . . especially if it's impossible now to take photos down, especially if it's impossible to stop the dissemination of the images . . . **There will never be a day in my entire lifetime that all of the images of me could ever be deleted.**" <sup>229</sup> (bold emphasis added)

Maya | *Survivor*

**"You delete it. It's reuploaded 20 million times faster than you can actually review it, delete it, go through it."** <sup>230</sup> (bold emphasis added)

Jenna Rolfe  
*Inside Sales Team Lead, MindGeek*  
*Sound Investigations, November 1, 2023*



**"But with this, there's such a level of permanence which affects everything. . . ."**

## 7. Failure to Protect Performers from Pirating of Content

Any person whose sexually explicit or suggestive content is non-consensually shared is, by definition, a victim of image-based sexual abuse. Even if a person originally consented to an image/video being recorded or if they previously monetized that material, for example by participating in the pornography industry, they have a right to control where and how that material is distributed. Yet, from the early days of the Porn 2.0 revolution to today, pornography tube sites have depended on copious amounts of pirated pornography—that is, pornography copied and uploaded to their platforms. As one journalist put it, “Porn doesn’t suffer from a piracy problem . . . it actively relies upon it.”<sup>231</sup>

As a result of their heavy dependence on pirated content, tube sites have been blamed for the demise of many pornography producers. For instance, in an investigation into the ownership of Pornhub, Patricia Nilsson of the *Financial Times* spoke to pornography producer Erika Lust who informed her:

They came into the market with a business model based on piracy and completely destroyed the industry, putting many production studios and performers out of business,” . . . She says her team sends MindGeek requests to remove her videos — both US and EU regulations mandate copyright holders to monitor whether their material is shared illegally — from their sites “weekly, if not daily.”<sup>232</sup>

In a separate report, Raustiala and Sprigman write:

Some in the adult industry maintain that MindGeek used online piracy as a weapon, using its tube sites to flood the market with pirated content and then snapping up producers whose businesses had been devalued by the onslaught of free content. Whether this story is true is not clear, but **it is undisputed that MindGeek, like virtually all sites that allow user-uploaded content, at times distributes pirated material.**<sup>233</sup> (bold emphasis added)

Tube sites’ dependence on pirated material adversely impacts performers. As Siri, a pornography performer, explained in a Quora post:

The tube sites that MindGeek owns do absolutely nothing to prevent users from uploading pirated content from other (non-MindGeek-owned) adult film studios. In fact, the more pirated content hosted on MindGeek’s tube sites, the more MindGeek profits from advertising revenue. It’s kind of like how Wal-Mart intentionally builds Wal-Marts in small towns and drives prices down to a level that no local business could ever compete with, thereby shutting down all of the mom-and-pop stores, and leaving the town with only one choice of where to shop: Wal-Mart.

Except imagine that Wal-Mart did that, and then to top it off went into the mom-and-pop shops and literally stole all of their products to be resold at Wal-Mart.<sup>234</sup>

Siri also explained the cumbersome process that performers must go through to submit take down requests of their pirated content on various platforms.

. . . it’s very common for the online forms not to work, to display some kind of error message upon submitting, or for the email address to kick the email back. Some tube sites are actually “aggregators” who don’t actually host the pirated videos on their servers but link directly to them (kind of like a torrent index) and those are the worst because they aren’t hosting the content they’re in a legal loophole, despite the fact that they’re still profiting via ad revenue from the stolen content.

Pornhub is one of the sites that does respond to DMCA<sup>zz</sup> takedown notices. They usually comply when I notify that they’re infringing on my copyright. However, I still don’t like them because the fact remains that they do absolutely nothing to prevent pirated content from appearing on their site. They’ll get away with anything they can.<sup>235</sup>

<sup>zz</sup> Digital Millennium Copyright Act of 1998.



In 2020, more than **1.6TB of images and videos** of mostly female performers were pirated from OnlyFans performers.<sup>236</sup> As reported by *The Verge*, "Rather than a hack, **the leak seems to be the result of OnlyFans customers acquiring the photos and videos individually, then sharing them with others and compiling them into a large file for free**"<sup>237</sup> (bold emphasis added). To clear up any ambiguity on this point, stealing images and videos from a subscription site, compiling them, and posting them online is not "leaking"—it's piracy.

While mainstream pornography platforms often claim to be a "safe" vehicle for performers to monetize their pornography, the reality is that little is done to protect performers from their videos being copied and uploaded to other pornography platforms, social media sites, or file sharing and torrent sites. The subscription-based platform OnlyFans provides an apt illustration of this point.

It is a common occurrence for subscribers of OnlyFans to rip the content pornography performers monetize on the site for distribution on other platforms. For instance, a Motherboard investigation "uncovered an entire supply chain of people stealing" performers' content "using scraping programs, without permission, in some cases by the hundreds of terabytes, and distributing it on other adult sites or selling scraping services through Discord."<sup>238</sup> Importantly, tube sites are able to monetize scraped (i.e., stolen) content with ads which play on the screen on which the uploaded videos appear.<sup>239</sup>



### OnlyFans Fails to Deliver on Its Promises for Performer Control and Safety

OnlyFans is an online media subscription platform primarily known and used for pornography production. As has been bluntly explained: “porn is the reason it exists.”<sup>240</sup>

OnlyFans introduced a new wave of pornography industry disruption, ironically by instituting a paywall and reviving the idea of paying for pornography, but in a novel move, those payments are to performers rather than studios.<sup>241</sup> It allows “creators” to post images, videos, and brief text, and “fans” to access the material via monthly subscriptions or pay-per-view.<sup>242</sup> Creators keep 80% of subscription fees; **OnlyFans takes a 20% cut.**<sup>243</sup>

#### The Origins of Only Fans

OnlyFans was founded in 2016 by the UK’s Tim Stokely, in collaboration with his father Guy, sister, and two brothers.<sup>244</sup> OnlyFans was not Tim Stokely’s only pornography venture— websites such as fetish site GlamWorship having preceded it.<sup>245</sup>

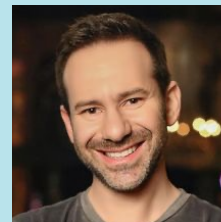
In 2018, Ukrainian-American Leonid Radvinsky purchased an estimated 75% share in Fenix International Holding Co., the parent company of OnlyFans.<sup>246</sup> Radvinsky was likewise not a newcomer to the pornography industry. An investigation by *Forbes* revealed his history of creating websites in the 1990s and early 2000s which teased that they contained hacked passwords to websites containing CSAM and bestiality, but which in fact were part of a “sex link farm business” that enabled him to drive up fees he charged to pornography sites, which were charged per click.<sup>247</sup> He is also the founder of sites that linked to celebrity sex tapes, as well as the site MyFreeCams, which provides live sexual performance via web cameras.<sup>248</sup> **Radvinsky is reported to have paid himself nearly \$1.3 million per day in 2022, and to have collected more than \$889 million from OnlyFans as of August 2023.**<sup>249</sup>

OnlyFans rose to cultural prominence in 2019 during the COVID-19 pandemic, as it was marketed as an easy way to get-rich-quick when people were struggling to make ends meet, and as a safe way for pornography performers to “be in control” of their own content. From September 2021 to September 2022, OnlyFans’ earnings rose to \$432 million—an astonishing 615%—with users spending \$4.8 billion on the site.<sup>250</sup>

Informal survey data<sup>aaa</sup> released in 2022 found that 71% of pornography content creators reported that OnlyFans was the top platform they used to sell their material.<sup>251</sup> However, there is considerable blurring between OnlyFans and Pornhub. As has been observed by Culture Reframed, “OnlyFans and webcamming are two hustles in the wider ecosystem of global porn. Every top 30 performer on Pornhub in 2021, for example, also sold content on OnlyFans. Conversely, a search for “OnlyFans” on Pornhub results in more than 50,000 videos.”<sup>252</sup>

**Although OnlyFans claims to robustly verify performers’ age (but not that of “fans”),<sup>253</sup> and its former CEO Amrapali Gan boasted that it was “the safest” social media platform,<sup>254</sup> evidence suggests otherwise.** The platform has been found to facilitate harassment, doxing and cyberstalking,<sup>255</sup> as well as sex trafficking,<sup>256</sup> CSAM, child online exploitation, and image-based sexual abuse.<sup>257</sup>

In 2024, a Reuters investigation found **128 cases** in which women and men have complained to U.S. police agencies that they were featured in sexually explicit content on OnlyFans without their consent—including one woman whose rape was recorded and allegedly sold on the platform.<sup>258</sup> **Only “28 ended in an arrest and eight resulted in any sort of criminal conviction. Three people went to jail — two for 48 hours each.”**<sup>259</sup>



Leonid Radvinsky  
75% shareholder of OnlyFans

<sup>aaa</sup> The report on the survey data did not provide details on its methodology or give a total number of participants who responded to the survey. Its results should not be taken as scientifically derived. However, its findings are supported by an informal estimate by Culture Reclaimed which reported, “I used Google to learn that 75% of the women performing in the 44 displayed videos [on Pornhub] sold content on OnlyFans” in Culture Reframed, *OnlyFans is Only Porn: The Online Ecosystem of Webcamming and OnlyFans*, n.d., [https://culturereframed.org/wp-content/uploads/2023/04/culture-reframed\\_whitepaper\\_022023\\_draft2.pdf](https://culturereframed.org/wp-content/uploads/2023/04/culture-reframed_whitepaper_022023_draft2.pdf) (accessed April 16, 2024.)

"[He] exposed my entire body for \$5. I can't even buy a full meal at McDonald's for \$5."<sup>260</sup>

Amanda Dicrosta  
IBSA Survivor<sup>bbb</sup>

Journalist Annie Lord describes the significant difficulties this theft creates for performers in her interviews with Alessa and Lucy, two OnlyFans pornography performers:

Alessa knew there wasn't much she could actually do to get the video back. "I didn't even bother reporting it," she tells me down the phone. "I just left it. Even if Pornhub took it down, there's nothing you can do to stop the user re-uploading, you can't steal that content back off them."

Lucy has managed to get her work taken down off Pornhub, but says it's an arduous process.

"You have to prove you're the owner of the video. Often people send them the original, unedited footage. If you can't prove it, they won't take it down." According to Lucy, you have to nag sites like Pornhub several times before they listen. "They make it such a struggle to take it down because they want the content; they are always on the side of the person uploading it."<sup>261</sup>

Performers have resorted to online forums asking for advice, commenting on the lack of protection or action that OnlyFans takes on their behalf:

I've recently found out that my onlyfans content (nog [sic] everything, but a bunch) is getting leaked and shared on a couple of forums. I've contacted onlyfans a couple of times for this and they promised me that their team will "take it down" but after 1.5 months nothing has been done.<sup>262</sup>

Another performer stated:

I have a fairly popular onlyfans and someone has downloaded 200 posts and uploaded them to a forum on a different website. This is now the first thing that comes up when you google my name. I've asked the person to take this post down as it's copyrighted but he refuses and deletes any comments I leave on the post. I've contacted onlyfans and the website who both haven't got back to me. What can I do? <sup>263</sup>

Media production studios consistently work to enforce copyright rules and do not allow their content to be circulated freely on the open internet. You cannot watch the movie Frozen on common sites like YouTube or Twitter without the studio's permission, and without monetization that in turn compensates those who created it. When it comes to pornography however—which has a far higher likelihood of trauma and harm if shared or created non-consensually—pornography platforms' use of content pirated from performers is an industry norm.<sup>264</sup>

### Irony Alert: MindGeek/Aylo Subsidiary MG Premium Ltd. Sues PornEZ for Piracy

It is an indisputable fact that MindGeek (now Aylo) built its empire, in part, by allowing users to upload pirated content. However, now that it sits atop a pornography oligopoly, the pornography megacorp seeks to exercise control over its premium content. In one of history's great moments of irony, MindGeek subsidiary MG Premium sued PornEZ in January 2023 for, of all things, piracy.<sup>265</sup>

Subsequently, MG Premium was awarded a default motion judgement of \$117 million in damages!<sup>266</sup> Yes, the pornography giant that became an empire and amassed countless millions in profits from pirated and other illegal material was awarded millions of dollars for violations of their copyright. In their civil complaint, MG Premium argued the following:

The conduct that gives rise to this lawsuit is egregious and willful. Defendants own and operate a website engaged in the business of copying and distributing infringing audiovisual works. Defendants are directly and knowingly involved in the trafficking of tens of thousands of pirated works – including thousands of works owned by MG Premium. . . . Defendants do not even attempt to comply with obligations under the DMCA. Instead, Defendants systematically refuse to comply with proper and compliant DMCA takedown notices against their own terms and conditions and displayed instructions. Defendants' actions are causing serious harm to MG Premium and its business. Defendants' infringing conduct must stop immediately. Because Defendants have not complied with demands to cease and desist, MG Premium is now constrained to come before this Court seeking injunctive and monetary relief.<sup>267</sup>

As ever, the pornography industry seeks to protect its own interests. Meanwhile, it remains unaccountable for the devastating harms it has inflicted on countless individuals who have had sexually explicit material non-consensually distributed via their platforms.

<sup>bbb</sup> Ms. Dicrosta's ex-boyfriend, Mike McFarland, a former player for the National Football League's Indianapolis Colt, posted videos of them having sex on his OnlyFans account without her permission. She knew some of the videos had been made, but the understanding between them was that they were private. Other videos were created without her knowledge.



## 8. Exploitation of AI and Normalization of Forged Pornography

A well-known early adopter of technology, the pornography industry, and those it has socialized to view IBSA as masturbatory material, have wasted no time in exploiting advanced technologies, including machine learning and artificial intelligence, to create and profit from AI-generated IBSA (i.e., AI-forged pornography), popularly referred to as “deepfakes.” As we explain in *Identifying Image-based Sexual Abuse: Classifications and Definitions*, there are two main categories of AI-generated IBSA:

- 1) forged pornography created by either superimposing an innocuous image of an identifiable person into pre-existing pornography so that one or more persons originally in the pornography are “replaced” with the image of another person, or by the use of “nudifying” apps which strip images of clothed, identifiable persons of their clothing, and
- 2) AI-generated pornography which utilizes massive collections of images of people scraped from the Internet and AI-related technology to create “new” pornography typically depicting an unidentifiable, AI-generated “person” but which may generate identifiable persons.<sup>268</sup>

Most of AI-forged pornography to date is of celebrity women (singers, actresses, social media influences, etc.).<sup>269</sup> A well-publicized example involved AI-generated sexualized images of singer Taylor Swift, which circulated via social media and garnered tens of millions of views.<sup>270</sup> However, increasingly, AI-generated pornography is being created of so-called “personal girls”—that is, any woman who a man wishes to pornify.<sup>271</sup>

Many cases of AI-forged pornography are now committed by male classmates of minor girls.<sup>272</sup> A report by Thorn found that **1 in 10 minors have a friend or classmate who has used AI tools to generate nude images of other children.**<sup>273</sup> AI-generated images of sexualized children may constitute child sexual abuse material (legally termed “child pornography”), which is illegal under US federal statute.<sup>274</sup>

Forged pornography is rapidly proliferating. In the first nine months of 2023, 113,000 forged pornography videos were uploaded to 35 websites set up to exclusively or partially host the material—a 54% increase from all of 2022.<sup>275</sup> This research also found an additional 300 “general” pornography websites which incorporate AI-generated pornography in some way.<sup>276</sup>

The majority of forged pornography is hosted by websites dedicated to so-called deepfake pornography, but 10% of this material is available on mainstream pornography platforms.<sup>277</sup> **Seven out of the top 10 pornography websites have been found to host AI-generated pornography.**<sup>278</sup> Sites offering the technological tools to create and/or host AI-forged pornography profit in three ways:

- 1) selling extra credits to access premium features, higher quality images, and other tools
- 2) premium subscriptions, and
- 3) advertising appearing on the user interface or with other content on the tool.<sup>279</sup>

Indicative of the material’s growing popularity, of **1,522 American men surveyed, 48% reported seeing forged pornography at least once. Further, one out of five daily pornography users reported replacing their use of “regular” pornography with AI-forged pornography.**<sup>280</sup>

While such material is quickly gaining popularity, it is imperative to remind the public that the appropriation of a person’s image or likeness for the unauthorized production of sexual materials is a form of **identity theft, invasion of privacy, fraud, and sexual violence.**

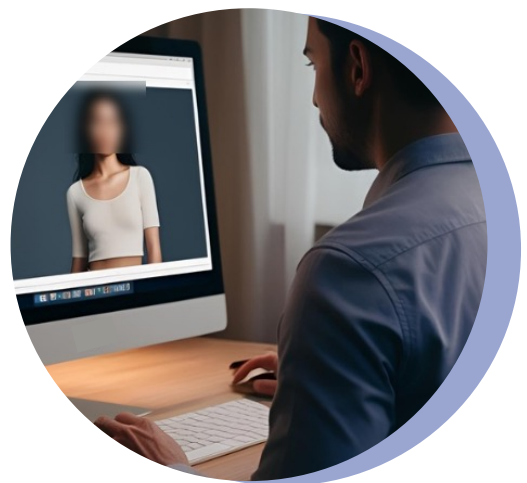
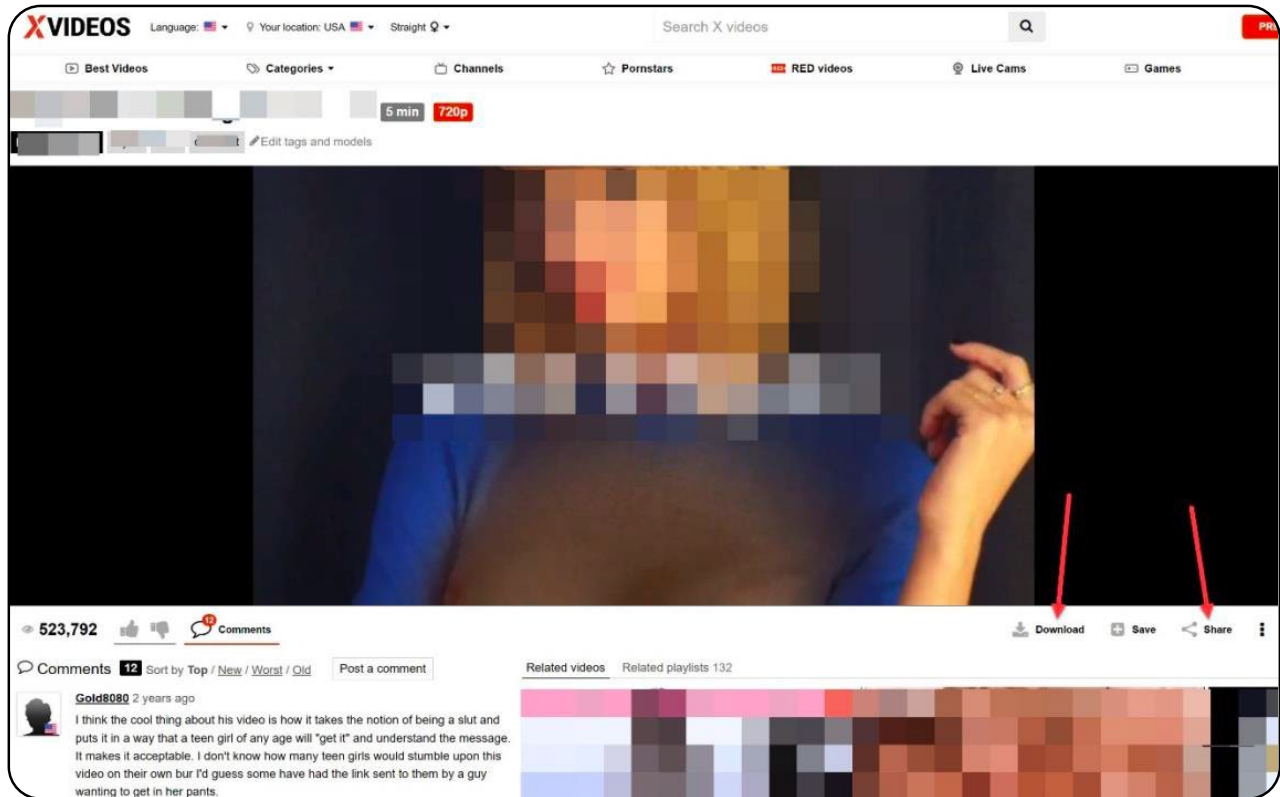


Figure 15: AI-Generated Forged Pornography Featuring a Celebrity Available on XVideos

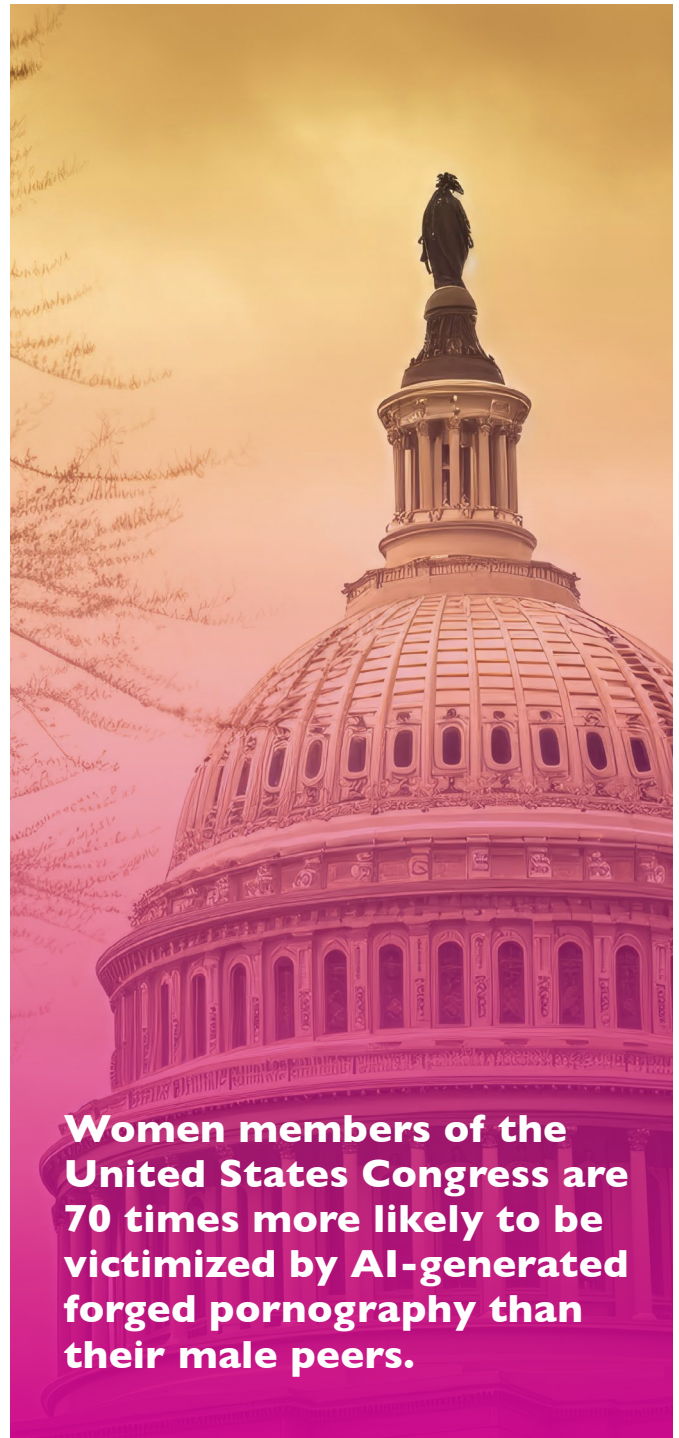


### AI-Forged Pornography: The Next Revolution in Online Sexual Exploitation and Pornography Industry Profiteering

AI-forged pornography is a class of computer-generated IBSA created using varying types of image-editing technology to depict, superimpose, or compose sexually explicit images or pornography so that persons appear to pose nude or perform in pornography when they did not.<sup>281</sup> The creation of forged pornography has been practiced for decades, but given the limitations of technology, such materials were detectable as forgeries.<sup>282</sup> However, modern advances based on the use of “deepfake” and AI-related technologies have made detection of this type of computer-generated sexually explicit material virtually impossible. While these image-editing or text-to-image technologies can be used for other purposes, **98% of AI-produced videos available online are of pornography.**<sup>283</sup>

Reflecting the deeply ingrained misogyny among the producers of this material, **99% of all AI-generated pornography features women.**<sup>284</sup> Further support for this fact was provided by research which identified tens of thousands of pieces of forged pornography featuring more than two dozen U.S. senators and members of the House of Representatives.<sup>285</sup> Of the 26 leaders victimized, there were 25 women and one man.<sup>286</sup> **Women members of the U.S. Senate and House of Representatives were 70 times more likely to be victimized by AI-generated forged pornography than male members.**<sup>287</sup>

Recent research has reported a staggering 464% growth rate in the presence of forged pornography available online between 2022 and 2023.<sup>288</sup>



**Women members of the United States Congress are 70 times more likely to be victimized by AI-generated forged pornography than their male peers.**

### Pornhub's Fake Fight to Remove Forged Pornography of Celebrity Women from Mainstream Pornography Sites

Journalists discovered that two months after Pornhub purportedly banned "deepfake" pornography of celebrities in 2018, **AI-generated pornography featuring several well-known actresses was still flourishing on the website**.<sup>289</sup> The view counts of many of the videos were in the hundreds of thousands, and one had racked up more than one million views.<sup>290</sup> The report also found that algorithms were promoting content using variations on the term "deep fakes" and **some of the forged videos were monetized with pre-roll advertisements**.<sup>291</sup>

Nearly two years later, so-called deep nude material was reported as present on Youporn and Pornhub sites.<sup>292</sup>

In March 2023, a researcher identified AI-generated pornography uploaded to Pornhub by a "verified" account and associated with six TrafficJunky (the advertising arm of Pornhub) advertisements.<sup>293</sup> These included rotating banner ads, side bar ads, and ads that would appear when the video was paused.<sup>294</sup> In August 2023, Brandon "AtrioC" Ewing, a popular streamer on the video-game streaming platform Twitch, inadvertently revealed that he had paid to view AI-generated pornography of fellow female Twitch streamers.<sup>295</sup> **He purportedly viewed the AI-generated IBSA material after seeing advertisements for it on Pornhub**.<sup>296</sup>

Also in 2023, Pornhub was among the top 10 domains referring to the world's most popular website for creation of AI-generated pornography.<sup>297</sup> Pornhub has also been shown to use inactive links to AI-generated pornography as click bait to drive traffic to its site, promote the secondary market for AI-pornography, and suggest AI-generated pornography to users via its algorithm.<sup>298</sup>





### Sex Trafficking and Non-consensually Shared Material Used to Create AI-Generated Pornography and Found in AI Training Datasets

Images of sex trafficked women have been harvested from pornography sites and used to create so-called “artificial” pornography. The operators of GirlsDoPorn and Czech Casting, two “**verified**” Pornhub content partners, were convicted or arrested on charges of sex trafficking (see “The Pornography Industry and Sex Trafficking” discussion below). Images of women sex trafficked by these companies have found their way into at least one dataset used to create AI-generated pornography, thus furthering their sexual exploitation.

An investigation by journalists Samantha Cole, Emanuel Maiberg, and Anna Koslerova discovered that GirlsDoPorn and Czech Casting material is in a dataset used by “deepfake” porn creators.<sup>299</sup> They reported, “One person using the dataset is creating what he describes as ‘a Harem of millions of actresses’ that can be inserted into deepfake porn, while another is using the dataset to create what he describes as ‘porn generated entirely by AI.’”<sup>300</sup>

When the dataset was created, the thousands of GirlsDoPorn and CzechCasting videos on Pornhub had amassed millions of views and users were still able to download the content. The journalists confirmed that videos depicting the actual rape, sex trafficking, and abuse of victims were present in the dataset. In one video in the dataset, “a woman starts to cry during filming and asks the man to stop. When he does, the camera zooms in on the woman to show that she is bleeding. The man hands her a towel and tells her to clean it up.”<sup>301</sup>

When “artificial” images are generated utilizing images of real sexual exploitation, it further revictimizes those who have already endured sexual exploitation. The journalists spoke with “Jane,” a survivor of Czech Casting, who told them, “**It feels unfair, it feels like my freedom is being taken away.**”<sup>302</sup>

Further, pornography performers are violated when their images are scraped and used without their consent. The journalists spoke with Leah Gotti, a pornography performer, whose images were also used in the dataset feeding AI-generated pornography. Gotti said, “**All those things are pirated, and that’s supposed to be against all the rules, but because we’re having sex on camera they’re like, well, she asked for it.**”<sup>303</sup>

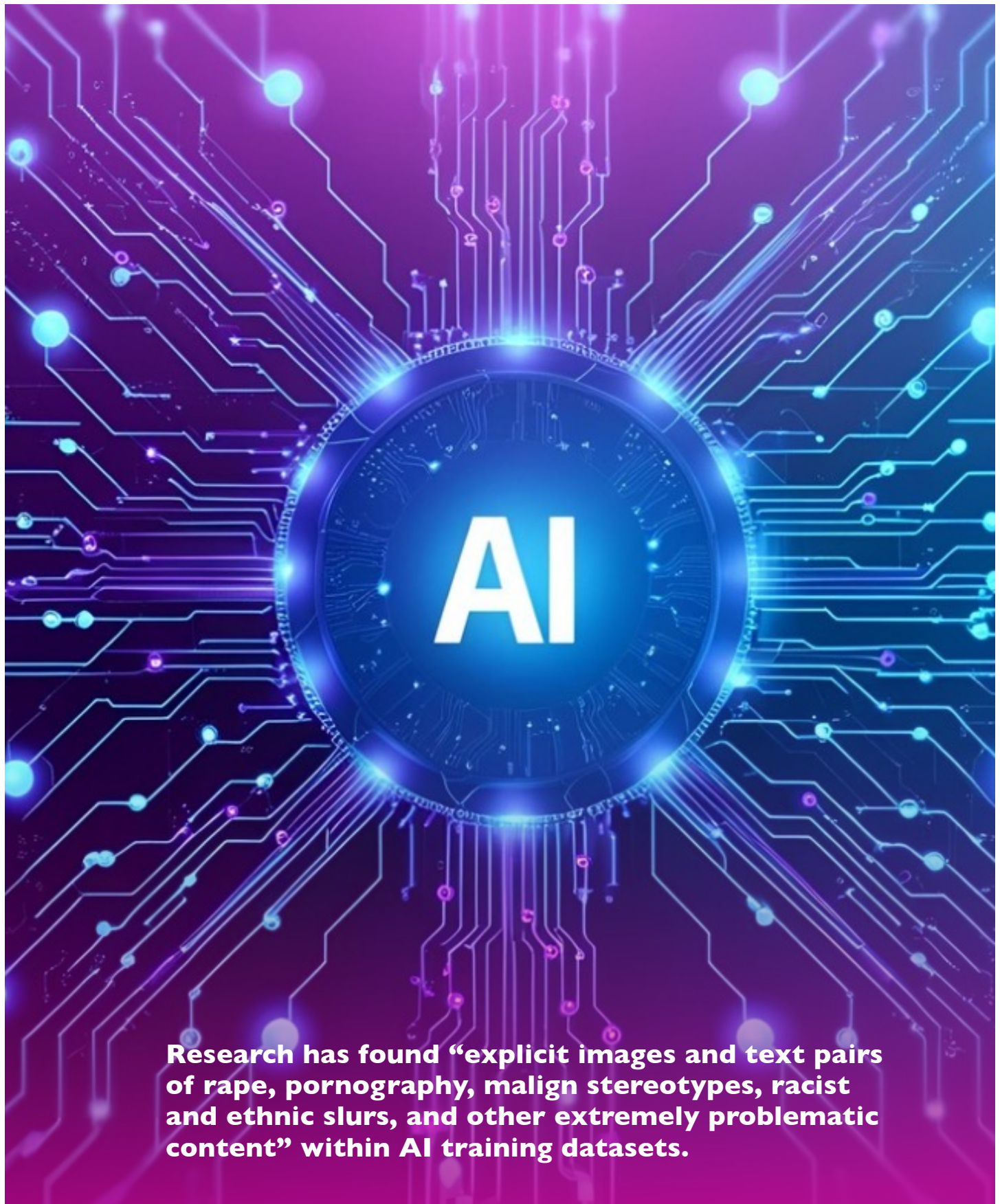
In an email to the journalists, a creator of AI pornography using these datasets including images from Czech Casting and GirlsDoPorn expressed another ethical concern: an image created via an algorithm or AI may produce an image of a recognizable person. He wrote:

It’s quite possible for the algorithm to reproduce fake people who resemble real people, but it wouldn’t be a 1-to-1 replication of the data it has trained on . . . This presents an ethical problem I’m trying to navigate around, which is identifying the rare situations where it does replicate a person from the ~7,500 images it’s learning from. It’s something that plagues generative networks . . . It’s possible and I’m not quite sure how to 100% avoid the possibility of this happening. But I really do want to avoid this. I’m not interested in deep-faking anyone, even by accident, it’s a bit scummy imho!<sup>304</sup>

Further, given the vast amount of non-consensually shared or created material online that will inevitably continue to feed open-source datasets, and the lack of identity and consent verification for use of images that have been scraped from pornography sites, it is clear that such practices are unethical, and by their very nature, perpetuate image-based sexual abuse. Researchers have elaborated on the problems with the content and curation of datasets on which machine learning models are trained, saying:

The rise of these gargantuan datasets has given rise to formidable bodies of critical work that has called for caution while generating these large datasets. These address concerns surrounding the dubious curation practices used to generate these datasets, the sordid quality of alt-text data available on the world wide web, the problematic content of the CommonCrawl dataset often used as a source for training large language models, and the entrenched biases in large-scale visio-linguistic models (such as OpenAI’s CLIP model) trained on opaque datasets (WebImageText). In the backdrop of these specific calls of caution, we examine the recently released LAION-400M dataset, which is a CLIP-filtered dataset of Image-Alt-text pairs parsed from the Common-Crawl dataset. **We found that the dataset contains, troublesome and explicit images and text pairs of rape, pornography, malign stereotypes, racist and ethnic slurs, and other extremely problematic content.**<sup>305</sup> (bold emphasis added)

For more on this topic, see our report *The High Stakes of AI Ethics: Evaluating OpenAI’s Potential Shift to “NSFW” Content and Other Concerns*.<sup>306</sup>



**Research has found “explicit images and text pairs of rape, pornography, malign stereotypes, racist and ethnic slurs, and other extremely problematic content” within AI training datasets.**

## 9. Lack of Meaningful Survivor-support Services and Failure to Permanently Remove IBSA

The near futility of survivor efforts to have their sexual abuse material removed from pornography platforms is well documented, as is the relentless emotional duress that this exhausting process creates for survivors.<sup>307</sup> It should not be the job of survivors of IBSA to forever police the presence of their abuse material on pornography sites. That responsibility must be shifted squarely onto the shoulders of the industry that has facilitated and profited from their abuse. While some major platforms have improved their responses to takedown requests, there are no industry-wide standards. The only way to hold pornography platforms accountable for failure to remove IBSA is for survivors to engage in civil litigation—a costly and arduous process that few survivors have the emotional and financial resources to pursue.

"Only time would reveal **the futility of the removal approach**, because the more I tried getting the material removed, the more sites I would discover, the more graphic the images were becoming and the more my images were being shared and seen. Sometimes I would be successful in getting an image or thread removed only to have it resurface on that same site weeks later. Some sites required ID to prove it was me making the requests. On some sites, **I could not locate the contact for the webmaster. Some sites just did not respond at all.**

It was exhausting. **It was literally a never-ending battle that I could not win no matter how much I tried.**"<sup>308</sup>  
(bold emphasis added)

Noelle Martin  
*Image-based Sexual Abuse and Deepfakes:  
A Survivor Turned Activist's Perspective*



### XVideos: "Download Button Clearly Visible – 'Report' Button Hidden"<sup>309</sup>

Investigative journalists researching IBSA on XVideos reported the following:

In the past, it wasn't as easy as it is today to report recordings on XVideos. An [archived version of the form](#) from November 2020 reads quite differently. Back then, anyone who wanted to report a video, for example, had to hand over their name, email, postal address and phone number. They had to explain in legal terms what was prohibited about the video, leave a digital signature and check the box: "I swear under penalty of perjury that the information in this notification is accurate". . . . the reporting form is not particularly easy to find. One path leads via the start page: Users have to scroll all the way down and click on "Content removal" in a list of links with small font. There is also a "Report" button for each video. However, this is hidden behind a inconspicuous three-dot symbol that has to be clicked separately.<sup>310</sup>





### The Pornography Industry and Sex Trafficking

Some pornography is created using both child and adult sex trafficking victims. In this report we focus only on cases involving adults.<sup>311</sup>

One such example involved two men, Lavont Flanders Jr., and Emerson Callum, who lured young women to Florida by offering them **modeling opportunities that never existed**.<sup>312</sup> Once the victims arrived, they were told they were to audition for an alcoholic beverage commercial.<sup>313</sup> During the faux auditions, **their victims were given alcoholic beverages laced with benzodiazepines, depressants used as date rape drugs**.<sup>314</sup> After the drugs took effect, the victims were driven by Flanders to another location where he would film Callum having sex with them.<sup>315</sup> The men then edited, produced, and sold videos of the rapes on the Internet and to pornography stores across the country.<sup>316</sup>

Pornography of sex trafficking victims has also been monetized and distributed globally via the mainstream pornography platform Pornhub. As discussed previously, the pornography production company **GirlsDoPorn sex trafficked the women it used to create pornography**, luring them with fake modeling opportunities. As an official Pornhub **"Content Partner"** GirlsDoPorn pornography was available **"on a range of sites operated by MindGeek, including Pornhub**, which hosted 70 GirlsDoPorn videos with more than **700,000 subscribers**."<sup>317</sup> MindGeek made close to a million dollars from this material **via direct payment from GirlsDoPorn, as well as payments from advertisers attributable to GirlsDoPorn channels**.<sup>318</sup>





## Part VIII: How The Pornography Industry Fuels IBSA (Continued)

In the civil case against GirlsDoPorn, evidence suggested that as early as 2009, but at least by 2016, MindGeek was likely aware of GirlsDoPorn's sexually exploitative practices. Even so, **MindGeek remained in partnership with GirlsDoPorn until October 2019**, when GirlsDoPorn was finally shuttered following the arrest and indictment of its operators by the US Department of Justice.<sup>319</sup>

However, MindGeek's profits did not end there. GirlsDoPorn videos were still hosted by MindGeek in December 2020, "surrounded by hyperlink advertisements that, if clicked, redirected the visitors to MindGeek's paysite."<sup>320</sup>

Importantly, in 2023 MindGeek admitted to federal prosecutors that it profited from sex trafficking. It agreed to the requirement of the appointment of a monitor for a period of three years, and to pay the government more than \$1.8 million.<sup>321</sup> However, a news report suggests that **survivors may receive as little as \$3,000** from this agreement.<sup>322</sup>

In another disturbing example described in a civil lawsuit against MindGeek, "verified" model **"Suga Daddy Zo"** allegedly filmed his sex encounters with prostituted persons without their consent. As the complaint states:

The description of his channel reads, 'On this channel I f\*\*k<sup>ccc</sup> all kinds of prostitutes. Street Walkers, Online Hos, Everyday working Hos, they all get f\*\*ked here.' Many of his videos are shot in his car with titles such as, "On the Hunt for Hos (The Lost Tapes of Ep.11) Run-a-way teen," "On the Hunt for Hos Ep. 16 (Kelvyn Park High School Teen) Barely Legal," His videos have **9.7 million views**, and he has **21 thousand subscribers**. It is clear that this 'Verified Model' is not submitting the name, age verification or any other information on the women he is exploiting in these videos and yet MindGeek approves them for distribution, collects the money paid by 'fans,' makes direct payments to this perpetrator, and shares in the profits.<sup>323</sup> (bold emphasis added)

In another case, a sex trafficker placed naked video clips of the woman he sex trafficked on **Twitter and XVideos**, where they had been for six years. A journalist was able to get the videos removed from Twitter, but at least four videos of her sexual exploitation remained on XVideos, collectively with 108,000 views as of April 2021.<sup>324</sup>

Pornography producer **Czech Casting**, owned by **Netlook**, the largest producer of pornography in the **Czech Republic**, lured young women with deceptive promises of professional modeling opportunities.<sup>325</sup> Once at a location on the outskirts of Prague, women would be given contracts stating that they would be shooting pornography but were told that the pornography would not be accessible to anyone in the Czech Republic.<sup>326</sup> Some were fearful of leaving the premises without having their IDs which had been taken by the receptionist.<sup>327</sup> Police arrested nine persons associated with **Czech Casting on charges of human trafficking, sexual coercion, and rape.**<sup>328</sup> **Czech Casting was also a long time content partner of MindGeek**, having a channel on Pornhub with more than 79 million views and boasting "the largest casting on Earth!"<sup>329</sup>



<sup>ccc</sup> Obscene language redacted.

## 5 Ways the Pornography Industry Contributes to Sex Trafficking<sup>ddd</sup>

1. Pornography is used to groom and train young victims of sex trafficking who lack sexual experience.<sup>330</sup>
2. Women, men, girls, and boys are sex trafficked for purposes of pornography production.<sup>331</sup>
3. Sex traffickers often create sexually explicit photos (i.e., pornography) of their victims and post them online as a part of “advertisements” used to attract sex buyers using Internet websites that serve as online “prostitution marketplaces.”<sup>eee#332</sup>
4. Pornography fuels the demand for prostitution and, as a result, fuels sex trafficking. Research shows that **men who are frequent pornography users are three times more likely to purchase sex than other men.**<sup>333</sup> Many other studies link pornography use with a greater likelihood of buying sex.<sup>334</sup>
5. Some men who purchase sexual access to people in the sex trade (many of whom are victims of sex trafficking) use pornography to build sexual excitement in advance<sup>335</sup> and may “act out” scenes from pornography on those they sexually exploit.<sup>336</sup>



<sup>ddd</sup> “5 Ways the Pornography Industry Contributes to Sex Trafficking” is adapted from the National Center on Sexual Exploitation’s forthcoming brief *7 Ways Pornography Fuses with Prostitution and Sex Trafficking*.

<sup>eee</sup> Prostitution marketplaces (e.g., street corners, brothels, strip clubs, interactive online platforms, etc.) are spaces where men seek to purchase sex acts and/or are the environments in which sex trafficking victims are sexually exploited. Male demand for sexually accessible persons in prostitution fuels sex trafficking.

---

## Part IX: How to Stop Image-based Sexual Abuse and Create Accountability for Its Creators, Online Distributors, and Profiteers

The pornography industry is culpable for the normalization and distribution of image-based sexual abuse (IBSA) material on a global scale. Beyond the pornography industry, on platforms such as Reddit and X, we also find IBSA that harms those who did not give meaningful consent to its distribution. This must stop. It is past time that governments acted to protect victims and create accountability to end IBSA. The National Center on Sexual Exploitation advocates that the following policy recommendations be implemented by legislatures and/or corporate entities.

Whether through legislation or private corporate policy:

### 1. Strengthen accountability for individuals and platforms that create, upload, or disseminate image-based sexual abuse material.

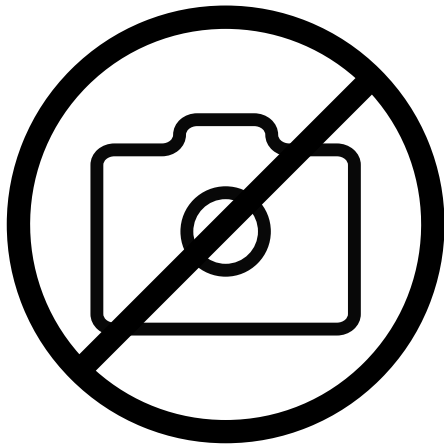
- Make it a federal crime with substantial penalties to upload to an interactive computer service material depicting nudity or sex acts without the consent of all those depicted in such material.
- Give survivors access to **civil liability** against platforms that facilitate creation, distribution, and/or monetization of non-consensually distributed sexually explicit material, AI-generated sexually explicit material depicting known persons (i.e., forged pornography), and/or child sexual abuse material.
- **Remove requirements of “harmful intent”** from IBSA laws.
- Establish and require participation in a cross-platform/company hashing systems to identify and proactively block the uploading of previously reported IBSA, CSAM, or non-verified AI-generated pornography.

### 2. Implement age and meaningful consent verification of every individual depicted in sexually explicit content on all online platforms that host and disseminate pornography. Platforms should obtain and retain such verification directly from performers, not through the account holder who may be exerting control and coercion over those depicted.

- Require the **documented consent of all persons** depicted in sexually explicit content, for each discreet recording or image, **before** the creation and dissemination of pornographic images or videos, including those used for advertising, and establish the **right of persons depicted to withdraw consent and remove the content at any time thereafter.**
- **Require age verification, not merely age estimation, for all individuals depicted in sexually explicit content** for each discreet recording or image, **before** uploading and disseminating sexually explicit images including those used for advertising. Verification must employ robust third-party tools; a picture of an ID is not sufficient.
- Require **consent and age verification** of each person depicted in each sexually explicit **live-stream and each live performance within subscription platforms**, including documented consent to *each* activity, motif, and partner depicted.
- Require *any* legal entity or person that disseminates or transmits sexually explicit material to maintain records of consent and age verification for *each* individual appearing in any image/video regardless of the medium of dissemination or transmission and prohibit the use of any images/videos in which individuals cannot be identified.
- Require, in advance of production, provision to each person depicted in sexually explicit content documentation regarding the location, motifs, sexual partners, duration, sex acts expected, other physical acts expected (e.g., hair pulling, slapping, strangulation), the location of where and duration for which the content will be posted, etc.
- **Create hefty fines** for each violation of identity and consent verification standards. Substantially increase fines for repeat offences.

### **3. Implement a survivor-centered reporting and removal process for image-based sexual abuse.**

- Provide platform users with easy-to-locate **reporting mechanisms**.
- **Remove reported material immediately** and block the ability for the content to resurface.
- Remove IBSA material if age and consent cannot be positively verified **for each person depicted**.
- Maintain the removal of reported sexually explicit content unless the uploader can affirmatively prove age and consent of all persons depicted.
- **Ban users who upload or share non-consensually shared or recorded sexually explicit materials** and prevent them from creating additional accounts. Require that the platform report the user who attempted to upload the material, within 24 hours, to law enforcement for investigation.
- Create new technologies for the identification of violative content to decrease the burden on survivors from having to search for and screenshot instances of their abuse when making a report.



### **4. Reduce access to IBSA on all online platforms that host and disseminate sexually explicit material**

- **Prohibit downloading and image scraping** of sexually explicit material from pornography platforms.
- **Prohibit the use of IBSA-themed tags and categorizations** for sexually explicit content on all online platforms that host and disseminate pornography.
- **Prohibit the monetization of IBSA-themed material** on all online platforms that host and disseminate pornography.
- **Create hefty fines** for each violation of tagging, categorization, and monetization prohibitions. Substantially increase fines for repeat violations.
- **Authorize and fund the Federal Communications Commission** to create guidelines, institute violation reporting procedures, and assess fines against violators.

### **5. Create transparency regarding the source of pornography.**

- **Watermark all AI-generated pornography.**
- Prohibit scraping/harvesting of pornography websites or of any other sexually explicit images depicting people from other websites for purposes of generative-AI model training or model output of pornography.
- Prohibit the hosting of AI-generated pornography from image repositories.



**6. Enhance research and data collection about image-based sexual abuse on platforms to better understand the impact and scope of the problem.**

- Require that all interactive Internet platforms release **annual** transparency reports to show how many cases of image-based sexual abuse were removed or reported.
- **Create and/or strengthen an IBSA hashing systems** (similar to the one used for CSAM) to prevent reported nonconsensual material from being re-uploaded.

**7. Implement sanctions against countries for failing to hold pornography platforms that disseminate IBSA (and/or CSAM) accountable.**

- Develop mechanisms for penalizing countries that provide safe havens for pornography platforms that disseminate IBSA (and/or CSAM).



## Part X: Endnotes

- <sup>1</sup> Albert Bandura, "Selective Activation and Disengagement of Moral Control," *Journal of Social Issues* 46, no. 1 (1990): 27–46, <https://doi.org/10.1111/j.1540-4560.1990.tb00270.x>.
- <sup>2</sup> Albert Bandura, "Selective Activation and Disengagement of Moral Control," *Journal of Social Issues* 46, no. 1 (1990): 27–46, <https://doi.org/10.1111/j.1540-4560.1990.tb00270.x>.
- <sup>3</sup> Obrilliant Damus, "The Rapes in Haiti: Psychological and Sociological Aspects of Sexual Crimes," *Études Caribéennes* 42 (2019): <https://doi.org/10.4000/etudescaribeenennes.22958>; Rachel Nostrant, "Navy Officer Arrested for Alleged Rape of Teenager He Met on Dating App," *Military.com*, March 19, 2024, <https://www.military.com/daily-news/2024/03/19/navy-officer-arrested-alleged-rape-of-teenager-he-met-dating-app.html>; Schwartz Law Group, "Michigan Teacher Pleads Guilty to Criminal Sexual Conduct over Allegations She Slept with Student," n.d., <https://www.criminallawmi.com/michigan-teacher-pleads-guilty-to-criminal-sexual-conduct-over-a> (accessed April 18, 2024).
- <sup>4</sup> Charles Winick, "Prostitutes' Clients' Perception of the Prostitutes and Themselves," *International Journal of Psychiatry* 8, no. 4 (1962), <https://doi.org/10.1177/002076406200800406>; Susan Ferrechio, "Feds Peruse Client List of Powerful 'Johns' after Bust of High-end Prostitution Ring," *Washington Times*, November 11, 2023, <https://www.washingtontimes.com/news/2023/nov/11/feds-peruse-client-list-of-powerful-johns-after-bu/>; Brian Beers, "Prostitution Scandals of the Rich, Famous & Powerful," *CNBC*, November 17, 2008, <https://www.cnb.com/2008/11/17/Prostitution-Scandals-of-the-Rich-Famous-Powerful.html>.
- <sup>5</sup> Whereyat, "Best Gentlemen's Clubs in New Orleans. NOLA's Top Gentleman's Clubs," (accessed April 18, 2024); WKRG, "Diamond's Gentleman's Club Unshaken by Shooting— 'We're Definitely Open'" April 17, 2024, <https://www.wkrg.com/mobile-county/diamonds-gentlemens-club-unshaken-by-shooting-were-definitely-open>; PR Newswire, "Peppermint Hippo, the Only Gentlemen's Club on the Las Vegas Strip is Now Open," April 21, 2022, <https://www.prnewswire.com/news-releases/peppermint-hippo-the-only-gentlemens-club-on-the-las-vegas-strip-is-now-open-301530120.html>.
- <sup>6</sup> Oxford Languages Online, "Fantasy," Oxford University Press, 2023 (URL omitted due to length).
- <sup>7</sup> Times Radio, "'No Under-18s are Watching,' Pornhub Speaks Exclusively to Times Radio" YouTube, February 5, 2025, at time stamp 4:45, <https://www.youtube.com/watch?v=MAzHeDlfyAU>; Chyng F. Sun, "The Fallacies of Fantasies," in *Pornography: Driving the Demand in International Sex Trafficking*, ed. David E. Guinn and Julie DiCaro (USA: Captive Daughters Media, 2007), 233–250. See also: Lara Karaian, "Addressing Deepfake Porn Doesn't Require New Criminal Laws, Which Can Restrict Sexual Fantasy and Promote the Prison System," *The Conversation*, March 24, 2024, <https://theconversation.com/addressing-deepfake-porn-doesnt-require-new-criminal-laws-which-can-restrict-sexual-fantasy-and-promote-the-prison-system-223815>.
- <sup>8</sup> Niki Fritz, et al., "A Descriptive Analysis of the Types, Targets, and Relative Frequency of Aggression in Mainstream Pornography," *Archives of Sexual Behavior* 49, (2020): 3041–3053, <https://doi.org/10.1007/s10508-020-01773-0>; Fiona Vera-Gray, Clare McGlynn, and Kate Butterby, "Sexual Violence as a Sexual Script in Mainstream Online Pornography," *The British Journal of Criminology* (2021): 1243–1260, <https://doi.org/10.1093/bjc/azab035>.
- <sup>9</sup> United States Attorney's Office, Eastern District of New York, "Pornhub Parent Company Admits to Receiving Proceeds of Sex Trafficking and Agrees to Three-Year Monitor," news release, December 21, 2023, <https://www.justice.gov/usao-edny/pr/pornhub-parent-company-admits-receiving-proceeds-sex-trafficking-and-agrees-three-year>; Nicholas Kristof, "The Children of Pornhub. Why Does Canada Allow this Company to Profit off Videos of Exploitation and Assault?" *New York Times*, December 4, 2020, <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>; Sebastian Meineck and Chris Köver, "World's Largest Porn Site: How XVideos Does Very Little against Sexualized Violence," *Netropolitik.org*, March 11, 2022, <https://netropolitik.org/2022/how-xvideos-does-very-little-against-sexualized-violence>; Sebastian Meineck and Yannah Alfering, "Inside xHamster: Undercover im Löschteam der Meistbesuchten Pornoseite Deutschlands," *Vice*, October 27, 2020, <https://www.vice.com/de/article/akdzdp/inside-xHamster-undercover-im-loeschteam-der-pornoseite>.
- <sup>10</sup> For more on "sexual responsibility" see Bill Herring's "Problematic Sexual Behavior Framework Summary" at <https://www.billherring.com/problematic-sexual-behavior-framework-summary> (accessed February 15, 2024).
- <sup>11</sup> Zara Ward, *Revenge Porn Helpline Report 2022*, <https://swgfl.org.uk/assets/documents/rp-report.pdf> (accessed June 13, 2023).
- <sup>12</sup> Clare McGlynn, et al., "'It's Torture for the Soul': The Harms of Image-based Sexual Abuse," *Social & Legal Studies* 30, no. 4 (2021): 541–562, <https://doi.org/10.1177/0964663920947791>.
- <sup>13</sup> Nicholas Kristof, "The Children of Pornhub. Why Does Canada Allow this Company to Profit off Videos of Exploitation and Assault?" *New York Times*, December 4, 2020, <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>.
- <sup>14</sup> Asher Flynn, et al., "Deepfakes and Digitally Altered Imagery Abuse: A Cross-Country Exploration of an Emerging form of Image-Based Sexual Abuse," *The British Journal of Criminology* 62, no. 6 (2022): 1341–1358, <https://doi.org/10.1093/bjc/azab111>; Victoria Rousay, "Sexual Deepfakes and Image-based Sexual Abuse: Victim-Survivor Experiences and Embodied Harms," (Master's thesis, Harvard University, Division of Continuing Education, 2023), <https://dash.harvard.edu/handle/1/37374909>. For the impact of IBSA more generally, see also Yanet Ruvalcaba and Asia A. Eaton, "Nonconsensual Pornography among U.S. Adults: A Sexual Scripts Framework on Victimization, Perpetration, and Health Correlates for Women and Men," *Psychology of Violence* 10, no. 1 (2020): 68–78, <https://doi.org/10.1037/vio0000233>; Clare McGlynn, et al., "'It's Torture for the Soul': The Harms of Image-Based Sexual Abuse," *Social & Legal Studies* 30, no. 4 (2021): 541–562, <https://doi.org/10.1177/0964663920947791>; Samantha Bates, "Revenge Porn and Mental Health: A Qualitative Analysis of the Mental Health Effects of Revenge Porn on Female Survivors," *Feminist Criminology* 12, no. 1 (2017): 22–42, <https://doi.org/10.1177/1557085116654565>.
- <sup>15</sup> Kat Tenbarge, "Found through Google, bought with Visa and Mastercard: Inside the Deepfake Porn Economy," *NBCNews.com*, March 27, 2023, <https://www.nbcnews.com/tech/internet/deepfake-porn-ai-mr-deep-fake-economy-google-visa-mastercard-download-rcna75071>.
- <sup>16</sup> Kat Tenbarge, "Found through Google, bought with Visa and Mastercard: Inside the Deepfake Porn Economy," *NBCNews.com*, March 27, 2023, <https://www.nbcnews.com/tech/internet/deepfake-porn-ai-mr-deep-fake-economy-google-visa-mastercard-download-rcna75071>.
- <sup>17</sup> Virginia Chamlee, "Inside the Case of Lawmaker Who Discovered Intimate 'Deepfake' Photos of Her Were Circulating Online," *People*, January 31, 2022, <https://people.com/politics/inside-the-case-of-the-florida-lawmaker-who-realized-deepfake-nudes-online>.
- <sup>18</sup> Virginia Chamlee, "Inside the Case of Lawmaker Who Discovered Intimate 'Deepfake' Photos of Her Were Circulating Online," *People*, January 31, 2022, <https://people.com/politics/inside-the-case-of-the-florida-lawmaker-who-realized-deepfake-nudes-online>.
- <sup>19</sup> Matt Burgess, "Deepfake Porn is Out of Control," *Wired*, October 16, 2023, <https://www.wired.com/story/deepfake-porn-is-out-of-control>.

**Part X: Endnotes (Continued)**

- <sup>20</sup> Victoria Rousay, "Pornhub's Deepfake Deception: Yet Another Way the Porn Giant Profits from Abuse," *National Center on Sexual Exploitation*, August 18, 2023, <https://endsexualexploitation.org/articles/pornhubs-deepfake-deception-yet-another-way-the-porn-giant-profits-from-abuse>.
- <sup>21</sup> Caitlin Dewey, "Some Creep is Prowling the D.C. Metro Filming Women for a Porn Site, and There's Nothing You Can Do about It," *Washington Post*, December 30, 2014, <https://ncose.egnyte.com/app/index.do#storage/file/9435124d-e75e-4082-a8b9-3b6545592656>.
- <sup>22</sup> Courtney Kube, "Navy Investigating Who Took Secret Videos of Sailors in a Bathroom and Posted to Porn Site," *NBC News*, January 24, 2020, <https://www.nbcnews.com/news/military/navy-probing-who-took-secret-videos-sailors-bathroom-posted-porn-n1121746>.
- <sup>23</sup> Katelynn Spencer, June 22, 2023, used with permission.
- <sup>24</sup> Christina Coulter, "GirlsDoPorn Co-Founder Wanted on Federal Sex Trafficking Charges Arrested in Spain," *Yahoo.com*, December 27, 2022, <https://www.yahoo.com/entertainment/girlsdoporn-co-founder-wanted-federal-233259796.html>.
- <sup>25</sup> United States Attorney's Office, Southern District of California, "GirlsDoPorn Operator Pleads Guilty in Sex Trafficking Conspiracy," news release, July 26, 2022, <https://www.justice.gov/usao-sdca/pr/girlsdoporn-operator-pleads-guilty-sex-trafficking-conspiracy>; Ashlee Gore and Leisha Du Preez, "'GirlsDoPorn': Online Pornography and Politics of Responsibility for Technology Facilitated Sexual Exploitation" in *The Palgrave Handbook of Gendered Violence and Technology*, ed. Anastasia Powell, Asher Flynn, and Lisa Sugiura (Cham, Switzerland: Palgrave MacMillan, 2021), <https://link.springer.com/book/10.1007/978-3-030-83734-1>.
- <sup>26</sup> Christina Coulter, "GirlsDoPorn Co-Founder Wanted on Federal Sex Trafficking Charges Arrested in Spain," *Yahoo.com*, December 27, 2022, <https://www.yahoo.com/entertainment/girlsdoporn-co-founder-wanted-federal-233259796.html>.
- <sup>27</sup> Ana Valens, "Pornhub Pulls Girls Do Porn Videos Amid Sex Trafficking Charges," *Dailydot.com*, October 15, 2019, <https://www.dailydot.com/irl/pornhub-girls-do-porn-federal-charges>.
- <sup>28</sup> Ashlee Gore and Leisha Du Preez, "'GirlsDoPorn': Online Pornography and Politics of Responsibility for Technology Facilitated Sexual Exploitation" in *The Palgrave Handbook of Gendered Violence and Technology*, ed. Anastasia Powell, Asher Flynn, and Lisa Sugiura (Cham, Switzerland: Palgrave MacMillan, 2021), <https://link.springer.com/book/10.1007/978-3-030-83734-1>.
- <sup>29</sup> Samantha Cole and Emanuel Maiberg, "Pornhub Finally Removes Girls Do Porn," *Vice*, October 14, 2019, <https://www.vice.com/en/article/43kb5q/pornhub-finally-removes-girls-do-porn>.
- <sup>30</sup> Meg O'Connor, "She Helped Expose Girls Do Porn, but She Can Never Outrun What It Did to Her," *Vice*, October 18, 2019, <https://www.vice.com/en/article/evjkdw/she-helped-expose-girls-do-porn-but-she-can-never-outrun-what-it-did-to-her>.
- <sup>31</sup> United States Attorney's Office, Eastern New York District, "Pornhub Parent Company Admits to Receiving Proceeds of Sex Trafficking and Agrees to Three-Year Monitor," news release, December 21, 2023), <https://www.justice.gov/usao-edny/pr/pornhub-parent-company-admits-receiving-proceeds-sex-trafficking-and-agrees-three-year>.
- <sup>32</sup> United States Attorney's Office, Eastern New York District, "Pornhub Parent Company Admits to Receiving Proceeds of Sex Trafficking and Agrees to Three-Year Monitor," news release, December 21, 2023), <https://www.justice.gov/usao-edny/pr/pornhub-parent-company-admits-receiving-proceeds-sex-trafficking-and-agrees-three-year>.
- <sup>33</sup> Le Monde with AFP, "French Porn Site Owner Arrested over Rape and Pimping Accusations," *Le Monde*, June 14, 2022, [https://www.lemonde.fr/en/france/article/2022/06/14/french-porn-site-owner-arrested-over-rape-and-pimping-accusations\\_5986719\\_7.html](https://www.lemonde.fr/en/france/article/2022/06/14/french-porn-site-owner-arrested-over-rape-and-pimping-accusations_5986719_7.html); Adam Solomons, "Owner of French Porn Site Jacquie et Michel is Arrested over Rape and Pimping Allegations and 'Three Male Actors are Detained for Gang-Rape' Following Claims Women Were Abused On Set," *Daily Mail*, June 14, 2022, <https://www.dailymail.co.uk/news/article-10916585/Owner-French-porn-site-arrested-rape-pimping-allegations-women-abused-set.html>.
- <sup>34</sup> Renato Stella, "The Amateur Roots of Gonzo Pornography," *Porn Studies* 3, no. 4 (2016): 351–361, <https://doi.org/10.1080/23268743.2016.1241157>.
- <sup>35</sup> Susanna Paasonen, *Carnal Resonance: Affect and Online Pornography* (Cambridge, MA: MIT Press, 2011), <https://chooser.crossref.org/?doi=10.7551%2Fmitpress%2F9780262016315.001.0001>.
- <sup>36</sup> Susanna Paasonen, *Carnal Resonance: Affect and Online Pornography* (Cambridge, MA: MIT Press, 2011), <https://chooser.crossref.org/?doi=10.7551%2Fmitpress%2F9780262016315.001.0001>.
- <sup>37</sup> Renato Stella, "The Amateur Roots of Gonzo Pornography," *Porn Studies* 3, no. 4 (2016): 351–361, <https://doi.org/10.1080/23268743.2016.1241157>.
- <sup>38</sup> *Jane Does Nos. 1 through 40 v MG Freesites, Ltd.*, No. 20CV2440 W RBB (S.D. Cal. 2020; 30), <https://digitalcommons.law.scu.edu/cgi/viewcontent.cgi?article=3395&context=historical> (accessed March 6, 2025).
- <sup>39</sup> Pornhub, "Year in Review 2024," December 5, 2024, n.p.
- <sup>40</sup> Pornhub, "Year in Review 2024," December 5, 2024, n.p.
- <sup>41</sup> Pornhub, "Year in Review 2024," December 5, 2024, n.p.
- <sup>42</sup> Matt Naham, "News Anchor Files \$10M Lawsuit after Sexualized Image of Her Was Used in Dating, Erectile Dysfunction Ads," *Law & Crime*, September 6, 2019, <https://www.lawandcrime.com/high-profile/news-anchor-files-10m-lawsuit-after-sexualized-image-of-her-was-used-in-dating-erectile-dysfunction-ads>.
- <sup>43</sup> Ibid.
- <sup>44</sup> Ibid.
- <sup>45</sup> Alyssa Mercante, "Popular Female Twitch Streamers Targeted in Deepfake Pornography Scandal," *Kotaku.com*, January 31, 2023, <https://kotaku.com/deepfake-atrion-twitch-streamer-apology-legal-action-1850055762>.
- <sup>46</sup> Alyssa Mercante, "Popular Female Twitch Streamers Targeted in Deepfake Pornography Scandal," *Kotaku.com*, January 31, 2023, <https://kotaku.com/deepfake-atrion-twitch-streamer-apology-legal-action-1850055762>.
- <sup>47</sup> Alyssa Mercante, "Popular Female Twitch Streamers Targeted in Deepfake Pornography Scandal," *Kotaku.com*, January 31, 2023, <https://kotaku.com/deepfake-atrion-twitch-streamer-apology-legal-action-1850055762>.
- <sup>48</sup> Sean Hollister, "Twitch Says Deepfake Porn is Now Grounds for Instaban — Here's Why," *The Verge*, March 7, 2023, <https://www.theverge.com/2023/3/7/23629634/twitch-deepfake-porn-ncei-ban-enforcement-atrion-pokima-ne>.
- <sup>49</sup> Compl., Does v. Murphy, et al, No. 7:20-cv-00947-JD (D.S.C., June 3, 2022).



**Part X: Endnotes (Continued)**

- <sup>50</sup> Compl., Does v. Murphy, et al, No. 7:20-cv-00947-JD (D.S.C., June 3, 2022).
- <sup>51</sup> Compl., Does v. Murphy, et al, No. 7:20-cv-00947-JD (D.S.C., June 3, 2022).
- <sup>52</sup> Compl., Does v. Murphy, et al, No. 7:20-cv-00947-JD (D.S.C., June 3, 2022).
- <sup>53</sup> Compl., Does v. Murphy, et al, No. 7:20-cv-00947-JD (D.S.C., June 3, 2022).
- <sup>54</sup> Birru Dereje Teshome, "Spy Camera Epidemic in Korea: A Situation Analysis," *Asian Journal of Sociological Research* 2, no. 1 (2019): 1–13; <https://globalpresshub.com/index.php/AJSR/article/view/782/727>. Rates slightly decrease in 2016 and 2017.
- <sup>55</sup> Birru Dereje Teshome, "Spy Camera Epidemic in Korea: A Situation Analysis," *Asian Journal of Sociological Research* 2, no. 1 (2019): 1–13; <https://globalpresshub.com/index.php/AJSR/article/view/782/727>.
- <sup>56</sup> "Tens of Thousands of South Korean Women Protest against 'Spycam Porn'" Monitor: Tracking Civic Space, Civicus, August 21, 2018, <https://monitor.civicus.org/updates/2018/08/21/tens-thousands-south-korean-women-protest-against-spycam-porn>.
- <sup>57</sup> Birru Dereje Teshome, "Spy Camera Epidemic in Korea: A Situation Analysis," *Asian Journal of Sociological Research* 2, no. 1 (2019): 1–13; <https://globalpresshub.com/index.php/AJSR/article/view/782/727>.
- <sup>58</sup> Beh Lih Yi, "Untouched Yet Ruined: Toll of S. Korea Spycam Epidemic," *Reuters*, January 12, 2020, <https://www.reuters.com/article/southkorea-women-rights/feature-untouched-yet-ruined-toll-of-s-korea-spycam-epidemic-idINL8N28F19Y>.
- <sup>59</sup> Antonie Mazieres, et al., "Deep Tags: Toward a Quantitative Analysis of Online Pornography," *Porn Studies* 1, no. 1-2 (2014): 80–95, <https://doi.org/10.1080/23268743.2014.888214>.
- <sup>60</sup> Kim Willsher, "Prosecutors Demand 20-Year Jail Term for Dominique Pelicot," *The Guardian*, November 25, 2025, <https://www.theguardian.com/world/2024/nov/25/prosecutors-demand-20-year-jail-term-for-dominique-pelicot>; Angelique Chrisafis, "Dominique Pelicot Faces Further Rape and Murder Investigation," *The Guardian*, December 19, 2024, <https://www.theguardian.com/world/2024/dec/19/dominique-pelicot-further-investigation-rape-murder>.
- <sup>61</sup> Kim Willsher, "Prosecutors Demand 20-Year Jail Term for Dominique Pelicot," *The Guardian*, November 25, 2025, <https://www.theguardian.com/world/2024/nov/25/prosecutors-demand-20-year-jail-term-for-dominique-pelicot>.
- <sup>62</sup> Kim Willsher, "Prosecutors Demand 20-Year Jail Term for Dominique Pelicot," *The Guardian*, November 25, 2025, <https://www.theguardian.com/world/2024/nov/25/prosecutors-demand-20-year-jail-term-for-dominique-pelicot>; Christina Lamb, "Gisèle Pelicot Said the Most Powerful Four Words I've Heard This Year," *The Sunday Times*, December 21, 2024, <https://www.thetimes.com/world/europe/article/url-gisele-pelicot-trial-france-sexual-violence-kdf0jq0b3>.
- <sup>63</sup> Christina Lamb, "Gisèle Pelicot Said the Most Powerful Four Words I've Heard This Year," *The Sunday Times*, December 21, 2024, <https://www.thetimes.com/world/europe/article/url-gisele-pelicot-trial-france-sexual-violence-kdf0jq0b3>.
- <sup>64</sup> Angelique Chrisafis, "Dominique Pelicot Faces Further Rape and Murder Investigation," *The Guardian*, December 19, 2024, <https://www.theguardian.com/world/2024/dec/19/dominique-pelicot-further-investigation-rape-murder>.
- <sup>65</sup> Angelique Chrisafis, "Dominique Pelicot Faces Further Rape and Murder Investigation," *The Guardian*, December 19, 2024, <https://www.theguardian.com/world/2024/dec/19/dominique-pelicot-further-investigation-rape-murder>.
- <sup>66</sup> Anastasia Powell, Nicola Henry, and Asher Flynn, "Image-based Sexual Abuse," in *Routledge Handbook of Critical Criminology*, 2nd ed., ed. Walter S. DeKeseredy (New York, NY: Taylor & Francis, 2018).
- <sup>67</sup> Asia Eaton, Holly Jacobs, and Yanet Ruvalcaba, 2017 *Nationwide Online Study of Nonconsensual Porn Victimization and Perpetration: A Summary Report*, (Cyber Civil Rights Initiative, 2017), <https://www.cybercivilrights.org/wp-content/uploads/2017/06/CCRI-2017-Research-Report.pdf>.
- <sup>68</sup> Cyber Civil Rights Initiative, "End Revenge Porn. A Campaign of the Cyber Civil Rights Initiative, Inc., Revenge Porn Statistics," n.d., <https://www.cybercivilrights.org/wp-content/uploads/2014/12/RPStatistics.pdf> (accessed April 18, 2024).
- <sup>69</sup> Clare McGlynn, et al., "'It's Torture for the Soul': The Harms of Image-Based Sexual Abuse," *Social & Legal Studies* 30, no. 4 (2021): 541-562, <https://doi.org/10.1177/0964663920947791>.
- <sup>70</sup> Clare McGlynn, et al., "'It's Torture for the Soul': The Harms of Image-Based Sexual Abuse," *Social & Legal Studies* 30, no. 4 (2021): 541-562, <https://doi.org/10.1177/0964663920947791>.
- <sup>71</sup> Clare McGlynn, et al., "'It's Torture for the Soul': The Harms of Image-Based Sexual Abuse," *Social & Legal Studies* 30, no. 4 (2021): 541-562, <https://doi.org/10.1177/0964663920947791>.
- <sup>72</sup> Walter S. DeKeseredy, "Image-Based Sexual Abuse: Social and Legal Implications," *Current Addiction Reports* 8, no. 1 (2021): 1–6, [https://www.researchgate.net/publication/349861030\\_Image-Based\\_Sexual\\_Abuse\\_Social\\_and\\_Legal\\_Implications](https://www.researchgate.net/publication/349861030_Image-Based_Sexual_Abuse_Social_and_Legal_Implications).
- <sup>73</sup> Andrea Powell, Hallie McCormick, and Bradley Myles, *I Didn't Consent: A Global Landscape Report on Image-Based Sexual Abuse* (Panorama Global, 2023), <https://www.panoramaglobal.org/publications/image-based-abuse-initiative-landscape-report-2023>.
- <sup>74</sup> Andrea Powell, Hallie McCormick, and Bradley Myles, *I Didn't Consent: A Global Landscape Report on Image-Based Sexual Abuse* (Panorama Global, 2023), <https://www.panoramaglobal.org/publications/image-based-abuse-initiative-landscape-report-2023>.
- <sup>75</sup> End Revenge Porn, A Campaign of the Cyber Civil Rights Initiative, Inc., "Revenge Porn Statistics," *CyberCivilRights.org*, 2014, <https://www.cybercivilrights.org/wp-content/uploads/2014/12/RPStatistics.pdf> (accessed April 4, 2024).
- <sup>76</sup> Brandon Sparks, "A Snapshot of Image-based Sexual Abuse (IBSA): Narrating a Way Forward," *Sexuality Research and Social Policy* 19 (2021): 689–704, <https://doi.org/10.1007/s13178-021-00585-8>.
- <sup>77</sup> Patricia Nilsson, "MindGeek: the Secretive Owner of Pornhub and RedTube" *Financial Times*, December 17, 2020, <https://www.ft.com/content/b50dc0a4-54a3-4ef6-88e0-3187511a67a2>.
- <sup>78</sup> Joe Castaldo, "Lifting the Veil of Secrecy on MindGeek's Online Pornography Empire," *Globe and Mail*, February 4, 2021, <https://www.theglobeandmail.com/business/article-mindgeeks-business-practices-under-scrutiny-as-political-pressure>.
- <sup>79</sup> Joe Castaldo, "Lifting the Veil of Secrecy on MindGeek's Online Pornography Empire," *Globe and Mail*, February 4, 2021, <https://www.theglobeandmail.com/business/article-mindgeeks-business-practices-under-scrutiny-as-political-pressure>.
- <sup>80</sup> Michelle Price, "Mastercard, Visa Suspend Ties with Ad Arm of Pornhub Owner MindGeek," *Reuters*, August 4, 2022, <https://www.reuters.com/business/finance/mastercard-visa-suspend-ties-with-ad-arm-pornhub-owner-mindgeek-2022-08-04>.



## Part X: Endnotes (Continued)

- <sup>81</sup> Gordon Deegan, "Grant Thornton Resigns as Auditor of Firms Owned by Pornhub Operator," *Irish Times*, February 9, 2021, <https://www.irishtimes.com/business/economy/grant-thornton-resigns-as-auditor-to-firms-owned-by-pornhub-operator-1.4480517#YCMd5f48f6s.twitter>.
- <sup>82</sup> Patrick Trueman and Dawn Hawkins to Adam Mosseri, from Washington, DC, May 1, 2023, [https://endsexualexploitation.org/wp-content/uploads/Instagram-Notification-Letter\\_DDL-2023\\_FINAL.pdf](https://endsexualexploitation.org/wp-content/uploads/Instagram-Notification-Letter_DDL-2023_FINAL.pdf).
- <sup>83</sup> Patrick Trueman and Dawn Hawkins to Steve Huffman, from Washington, DC, April 26, 2023, [https://endsexualexploitation.org/wp-content/uploads/Reddit-Notification-Letter\\_DDL-2023\\_FINAL\\_Redacted.pdf](https://endsexualexploitation.org/wp-content/uploads/Reddit-Notification-Letter_DDL-2023_FINAL_Redacted.pdf).
- <sup>84</sup> Patrick Trueman and Dawn Hawkins to Jack Dorsey and Omid Kordestani, from Washington DC, February 1, 2018, [https://endsexualexploitation.org/wp-content/uploads/dd\\_TwitterLetter\\_Signed\\_02-01-2018.pdf](https://endsexualexploitation.org/wp-content/uploads/dd_TwitterLetter_Signed_02-01-2018.pdf).
- <sup>85</sup> Patrick Trueman and Dawn Hawkins to Jason Citron, from Washington, DC, April 26, 2023, [https://endsexualexploitation.org/wp-content/uploads/Discord-Notification-Letter\\_DDL-2023\\_FINAL\\_Redacted.pdf](https://endsexualexploitation.org/wp-content/uploads/Discord-Notification-Letter_DDL-2023_FINAL_Redacted.pdf).
- <sup>86</sup> Jyotsna Basotia, "Who Own XVideos? 'Wild West' of Internet Porn Sees Surge in Followers after Pornhub Tightens Restrictions," *meaww.com*, December 15, 2020, <https://meaww.com/xvideos-owner-internet-porn-surge-pornhub-safe-millions-followers-verified-accounts-twitter-trend>; Complaint Doe v. WebGroup Czech Republic, No. 221CV02428VAPSKX (C.D. Cal. Mar. 18, 2021), [https://endsexualexploitation.org/wp-content/uploads/Xvideos-complaint-as-filed\\_Jane-Doe-v-WebGroup-Czech-Republic-et-al\\_03-18-2021.pdf](https://endsexualexploitation.org/wp-content/uploads/Xvideos-complaint-as-filed_Jane-Doe-v-WebGroup-Czech-Republic-et-al_03-18-2021.pdf) (accessed May 16, 2023); Nicholas Kristof, "Why Do We Let Corporations Profit from Rape Videos," *New York Times*, April 16, 2021, <https://www.nytimes.com/2021/04/16/opinion/sunday/companies-online-rape-videos.html>.
- <sup>87</sup> Emma Roth, "Pornhub's Parent Company is Changing Its Name to Total Nonsense," *The Verge*, August 18, 2023, <https://www.theverge.com/2023/8/18/23837670/pornhub-parent-company-mindgeek-rebrand-aylo>.
- <sup>88</sup> Calum Muirhead, "Irony is Dead: Ethical Capital buys Pornhub. Private Equity Firm that Prides Itself on 'Ethics-based Investing' Buys the Owner of Pornography Website Pornhub," *This is Money.co.uk*, March 18, 2023, <https://www.thisismoney.co.uk/money/markets/article-11873671/Irony-dead-Ethical-Capital-buys-Pornhub.html>.
- <sup>89</sup> Martin Patriquin, "Details of Pornhub's 'Transparent' New Ownership Buried in British Virgin Islands, Documents Show," *The Logic*, June 19, 2023, <https://thelogic.co/news/details-of-pornhubs-transparent-new-ownership-buried-in-british-virgin-islands-documents-show/>.
- <sup>90</sup> Martin Patriquin, "Legal Documents Reveal Details of Pornhub's \$400M Sale for the First Time," *The Logic*, March 20, 2025, <https://thelogic.co/news/pornhub-mindgeek-ownership-aylo/>.
- <sup>91</sup> Information obtained via trademark searches conducted on Justia Trademarks, December 14, 2023. Note, the trademark for XTube is registered to Manwin Licensing International S rl. Manwin was the forerunner of MindGeek. A reconfirmation of this data was performed on January 23, 2025, on [Trademarkengine.com](http://Trademarkengine.com).
- <sup>92</sup> Martin Patriquin, "Details of Pornhub's 'Transparent' New Ownership Buried in British Virgin Islands, Documents Show," *The Logic*, June 19, 2023, <https://thelogic.co/news/details-of-pornhubs-transparent-new-ownership-buried-in-british-virgin-islands-documents-show/>.
- <sup>93</sup> Sebastian Meineck, "Porn Platform: The Men Behind xHamster," *Netzp olitik.org*, October 15, 2021, <https://netzp olitik.org/2021/pornplattform-die-maenner-hinter-xHamster>.
- <sup>94</sup> Ibid.
- <sup>95</sup> Patricia Nilsson and Alex Barker, "Hot Money. Porn, Power, & Profit. Knocking on the Door of a Porn Empire," *Financial Times*, January 19, 2023, <https://www.ft.com/content/cc9ab3c5-bfe1-40d0-862d-c35123ceaf1>.
- <sup>96</sup> Similar Web, "Top Websites Ranking," May 1, 2023, <https://www.similarweb.com/top-websites/> (accessed May 16, 2023).
- <sup>97</sup> Similar Web, January 2024 through December 2024. Data provided by The Reward Foundation.
- <sup>98</sup> Martin Patriquin, "Details of Pornhub's 'Transparent' New Ownership Buried in British Virgin Islands, Documents Show," *The Logic*, June 19, 2023, <https://thelogic.co/news/details-of-pornhubs-transparent-new-ownership-buried-in-british-virgin-islands-documents-show/>; Patricia Nilsson, "Pornhub Owner Sold to Canadian Private Equity Firm Ethical Capital," *Financial Times*, March 16, 2023, <https://www.ft.com/content/69c3295e-6f45-4b5f-8e7b-3b8d56ca46c8>. Note: While in the aforementioned article attorney and co-founding partner of Ethical Capital Partners Solomon Friedman asserts that "no previous shareholders retain any ownership, right or control of the company in any way," we are not convinced that this is true. The lack of transparency around the transaction and the fact that MindGeek-related trademarks are still registered to Licensing IP International S r.L. casts doubt on such assertions.
- <sup>99</sup> Patricia Nilsson, "MindGeek: the Secretive Owner of Pornhub and RedTube" *Financial Times*, December 17, 2020, <https://www.ft.com/content/b50dc0a4-54a3-4ef6-88e0-3187511a67a2>.
- <sup>100</sup> *Dailymail.com*, "REVEALED: Pornhub Founders are Four Canadian College Friends Dubbed 'The Kings of Smut' Who Made Millions by Creating YouTube of Porn in 2007 but Now Face a Reckoning as Visa and Mastercard Cut Ties with Their Site over Child Rape Claims", December 11, 2020, <https://www.dailymail.co.uk/news/article-9036291/Pornhub-dig.html> (accessed June 13, 2023).
- <sup>101</sup> *Dailymail.com* Reporter, "REVEALED: Pornhub Founders are Four Canadian College Friends Dubbed 'The Kings of Smut' Who Made Millions by Creating the YouTube of Porn in 2007 but Now Face a Reckoning as Visa and Mastercard Cut Ties with Their Site over Child Rape Claims," *Daily Mail*, December 11, 2020, <https://www.dailymail.co.uk/news/article-9036291/Pornhub-dig.html>.
- <sup>102</sup> Patricia Nilsson and Alex Barker, "Hot Money. Porn, Power, & Profit. Knocking on the Door of a Porn Empire," *Financial Times*, January 19, 2023, <https://www.ft.com/content/cc9ab3c5-bfe1-40d0-862d-c35123ceaf1>; Complaint, Doe v. WebGroup Czech Republic, as, No. 221CV02428VAPSKX (C.D. Cal. Mar. 18, 2021), [https://endsexualexploitation.org/wp-content/uploads/Xvideos-complaint-as-filed\\_Jane-Doe-v-WebGroup-Czech-Republic-et-al\\_03-18-2021.pdf](https://endsexualexploitation.org/wp-content/uploads/Xvideos-complaint-as-filed_Jane-Doe-v-WebGroup-Czech-Republic-et-al_03-18-2021.pdf) (accessed May 16, 2023).
- <sup>103</sup> Patricia Nilsson and Alex Barker, "Hot Money. Porn, Power, & Profit. Knocking on the Door of a Porn Empire," *Financial Times*, January 19, 2023, <https://www.ft.com/content/cc9ab3c5-bfe1-40d0-862d-c35123ceaf1>; Complaint, Doe v. WebGroup Czech Republic, as, No. 221CV02428VAPSKX (C.D. Cal. Mar. 18, 2021), [https://endsexualexploitation.org/wp-content/uploads/Xvideos-complaint-as-filed\\_Jane-Doe-v-WebGroup-Czech-Republic-et-al\\_03-18-2021.pdf](https://endsexualexploitation.org/wp-content/uploads/Xvideos-complaint-as-filed_Jane-Doe-v-WebGroup-Czech-Republic-et-al_03-18-2021.pdf) (accessed May 16, 2023).
- <sup>104</sup> Antonie Mazieres, et al., "Deep Tags: Toward a Quantitative Analysis of Online Pornography," *Porn Studies* 1, no. 1-2 (2014): 80-95, <https://doi.org/10.1080/23268743.2014.888214>.
- <sup>105</sup> "XVideos Logo," Logos-World, December 18, 2024, <https://logos-world.net/xvideos-logo/>.
- <sup>106</sup> Sebastian Meineck, "Porn Platform: The Men Behind xHamster," *Netzp olitik.org*, October 15, 2021, <https://netzp olitik.org/2021/pornplattform-die-maenner-hinter-xHamster>.

## Part X: Endnotes (Continued)

- <sup>107</sup> Sebastian Meineck, "Porn Platform: The Men Behind xHamster," *Netzpolitik.org*, October 15, 2021, <https://netzpolitik.org/2021/pornplattform-die-maenner-hinter-xHamster>.
- <sup>108</sup> Ben Woods, "The (Almost) Invisible Men and Women behind the World's Largest Porn Sites," *Thenextweb.com*, March 3, 2016, <https://thenextweb.com/news/the-almost-invisible-men-and-women-behind-the-worlds-largest-porn-sites>.
- <sup>109</sup> Patricia Nilsson and Alex Barker, "Hot Money. Porn, Power, & Profit. Knocking on the Door of a Porn Empire," *Financial Times*, January 19, 2023, <https://www.ft.com/content/cc9ab3c5-bfe1-40d0-862d-c35123ceaf1>; Complaint Doe v. WebGroup Czech Republic, as, No. 221CV02428VAPSKX (C.D. Cal. Mar. 18, 2021), [https://endsexualexploitation.org/wp-content/uploads/Xvideos-complaint-as-filed\\_Jane-Doe-v-WebGroup-Czech-Republic-et-al\\_03-18-2021.pdf](https://endsexualexploitation.org/wp-content/uploads/Xvideos-complaint-as-filed_Jane-Doe-v-WebGroup-Czech-Republic-et-al_03-18-2021.pdf) (accessed May 16, 2023).
- <sup>110</sup> Patricia Nilsson and Alex Barker, "Hot Money. Porn, Power, & Profit. Knocking on the Door of a Porn Empire," *Financial Times*, January 19, 2023, <https://www.ft.com/content/cc9ab3c5-bfe1-40d0-862d-c35123ceaf1>; Complaint Doe v. WebGroup Czech Republic, as, No. 221CV02428VAPSKX (C.D. Cal. Mar. 18, 2021), [https://endsexualexploitation.org/wp-content/uploads/Xvideos-complaint-as-filed\\_Jane-Doe-v-WebGroup-Czech-Republic-et-al\\_03-18-2021.pdf](https://endsexualexploitation.org/wp-content/uploads/Xvideos-complaint-as-filed_Jane-Doe-v-WebGroup-Czech-Republic-et-al_03-18-2021.pdf) (accessed May 16, 2023).
- <sup>111</sup> Antonie Mazieres, et al., "Deep Tags: Toward a Quantitative Analysis of Online Pornography," *Porn Studies* 1, no. 1-2 (2014): 80–95, <https://doi.org/10.1080/23268743.2014.888214>.
- <sup>112</sup> Decisión del Panel Administrativo no D2014-0494 of WIPO Arbitration and Mediation Center, Tuesday June 17, 2014, case WGCZ S.R.O. v. Whois Privacy Services Pty Ltd./Murat Yikilmaz, <https://international.vlex.com/vid/wgcz-whois-privacy-ltd-murat-yikilmaz-516274294>.
- <sup>113</sup> Kal Raustiala and Christopher Jon Sprigman, "The Second Digital Disruption: Streaming and the Dawn of Data-Driven Creativity," *New York University Law Review* 94, no. 6 (2019): 1555–1622, [dx.doi.org/10.2139/ssrn.3226566](https://doi.org/10.2139/ssrn.3226566); Aleksandra Diana Dwulit and Piotr Rzymiski, "Prevalence, Patterns and Self-Perceived Effects of Pornography Consumption in Polish University Students: A Cross-Sectional Study," *International Journal of Environmental Research and Public Health* 16 (2019): <https://doi.org/10.3390/ijerph16101861>.
- <sup>114</sup> In 2022, Pornhub reported that 84% of all traffic to its site was via smartphone. Pornhub, "The 2022 Year in Review," December 8, 2022.
- <sup>115</sup> Eric Chemi, "Playboy Magazine over the Years, by the Numbers," *Finance.yahoo.com*, December 11, 2015, <https://finance.yahoo.com/news/prediction-nvidia-stock-going-soar-124300040.html>.
- <sup>116</sup> Pornhub, *The Pornhub Tech Review*, April 8, 2021.
- <sup>117</sup> Aneta Hoszowska and Tomas Janovsky, "Porn 2.0 Straight from the Horse's Mouth. Consumption and Production of User Generated Content" (Master's thesis, Lund University, 2014), <https://lup.lub.lu.se/luur/download?func=downloadFile&recordId=4584403&fileId=4584409> (accessed September 27, 2023).
- <sup>118</sup> Aneta Hoszowska and Tomas Janovsky, "Porn 2.0 Straight from the Horse's Mouth. Consumption and Production of User Generated Content" (Master's thesis, Lund University, 2014), <https://lup.lub.lu.se/luur/download?func=downloadFile&recordId=4584403&fileId=4584409> (accessed September 27, 2023); Gareth Tyson, et al., "Demystifying Porn 2.0: A Look into a Major Adult Video Streaming Website," IMC '13: *Proceedings of the 2013 Conference on Internet Measurement Conference*, (October, 23, 2013): 417–426, <https://doi.org/10.1145/2504730.2504739>.
- <sup>119</sup> Aneta Hoszowska and Tomas Janovsky, "Porn 2.0 Straight from the Horse's Mouth. Consumption and Production of User Generated Content" (Master's thesis, Lund University, 2014), <https://lup.lub.lu.se/luur/download?func=downloadFile&recordId=4584403&fileId=4584409> (accessed September 27, 2023).
- <sup>120</sup> Kal Raustiala and Christopher Jon Sprigman, "The Second Digital Disruption: Streaming and the Dawn of Data-Driven Creativity," *New York University Law Review* 94, no. 6 (2019): 1555–1622, [dx.doi.org/10.2139/ssrn.3226566](https://doi.org/10.2139/ssrn.3226566); Laura McVey, Meagan Tyler, and Lauren Gurrieri, "Care as Camouflaging Capitalism and Obscuring Harm: The User-Generated Pornography Market and Women's Inequality," *Women's Studies International Forum* 91 (2022): <https://doi.org/10.1016/j.wsif.2022.102573>.
- <sup>121</sup> Bonnie Ruberg, "Doing It for Free: Digital Labour and the Fantasy of Amateur Online Pornography," *Porn Studies* 3, no. 2 (2016): 147–159, <https://doi.org/10.1080/23268743.2016.1184477>.
- <sup>122</sup> Kal Raustiala and Christopher Jon Sprigman, "The Second Digital Disruption: Streaming and the Dawn of Data-Driven Creativity," *New York University Law Review* 94, no. 6 (2019): 1555–1622, [dx.doi.org/10.2139/ssrn.3226566](https://doi.org/10.2139/ssrn.3226566); David Auerback, "Vampire Porn. MindGeek is a Cautionary Tale of Consolidating Production and Distribution in a Single, Monopolistic Owner," *Slate*, October 23, 2014, <https://slate.com/technology/2014/10/mindgeek-porn-monopoly-its-dominance-is-a-cautionary-tale-for-other-industries.html>; Bonnie Ruberg, "Doing It for Free: Digital Labour and the Fantasy of Amateur Online Pornography," *Porn Studies* 3, no. 2 (2016): 147–159, <https://doi.org/10.1080/23268743.2016.1184477>; Patricia Nilsson, "MindGeek: the Secretive Owner of Pornhub and RedTube" *Financial Times*, December 17, 2020, <https://www.ft.com/content/b50dc0a4-54a3-4ef6-88e0-3187511a67a2>.
- <sup>123</sup> Bonnie Ruberg, "Doing It for Free: Digital Labour and the Fantasy of Amateur Online Pornography," *Porn Studies* 3, no. 2 (2016): 147–159, <https://doi.org/10.1080/23268743.2016.1184477>; Laura McVey, Meagan Tyler, and Lauren Gurrieri, "Putting Pornography on the Marketing Agenda," in *Routledge Companion to Marketing and Feminism*, ed. Lorna Stevens, Olga Kravets, and Pauline Maclaran (New York, NY: Routledge, Taylor & Francis Group, 2022), 445–459; Nicola Henry and Asher Flynn, "Image-based Sexual Abuse: Online Distribution Channels and Illicit Communities of Support," *Violence Against Women* 25, no. 16 (2019): 1932–1955, <https://doi.org/10.1177/1077801219863881>.
- <sup>124</sup> Pornhub, "The 2022 Year in Review," December 8, 2022.
- <sup>125</sup> Johanna M. F. van Oosten and Laura Vandenbosch, "Predicting the Willingness to Engage in Non-Consensual Forwarding of Sex: The Role of Pornography and Instrumental Notions of Sex," *Archives of Sexual Behavior* 49 (2020): 1121–1132, <https://doi.org/10.1007/s10508-019-01580-2>.
- <sup>126</sup> Jennifer A. Johnson, "Mapping the Feminist Political Economy of the Online Commercial Pornography Industry: A Network Approach," *International Journal of Media and Cultural Politics* 7, no. 2 (2011): 189–208, [https://intellectdiscover.com/content/journals/10.1386/macp.7.2.189\\_1](https://intellectdiscover.com/content/journals/10.1386/macp.7.2.189_1).
- <sup>127</sup> Kal Raustiala and Christopher Jon Sprigman, "The Second Digital Disruption: Streaming and the Dawn of Data-Driven Creativity," *New York University Law Review* 94, no. 6 (2019): 1555–1622, [dx.doi.org/10.2139/ssrn.3226566](https://doi.org/10.2139/ssrn.3226566). See also Table 1.

## Part X: Endnotes (Continued)

- <sup>128</sup> Fiona Vera-Gray, et al., "Sexual Violence as a Sexual Script in Mainstream Online Pornography," *The British Journal of Criminology* (2021): 1-18, [doi:10.1093/bjc/azab035](https://doi.org/10.1093/bjc/azab035). See also, Paul J. Wright, Robert Tokunaga, and Debby Herbenick, "But Do Porn Sites Get More Traffic than TikTok, OpenAI, and Zoom?" *The Journal of Sex Research* 60, no. 6 (2023), 763–767, <https://doi.org/10.1080/00224499.2023.2220690>; Paul J. Wright, "Pornographic Socialization as 'Selective-Exposure': Let it Go, Let it Go II, Letter to the Editor," *Archives of Sexual Behavior* 50 (2021):393–399, [doi.org/10.1002/9781118783764.wbieme0024](https://doi.org/10.1002/9781118783764.wbieme0024); Paul J. Wright and Ashley K. Randall, "Internet Pornography Exposure and Risky Sexual Behavior among Adult Males in the United States," *Computers in Human Behavior* 28, no. 4 (2012): 1410–1416, <https://doi.org/10.1016/chb.2012.03.003>; Patrick Keilty, "Desire by Design: Pornography as Technology Industry," *Porn Studies* 5, no. 3 (2018): 338–342, <https://doi.org/10.1080/23268743.2018.1483208>.
- <sup>129</sup> Nicholas Kristof, "The Children of Pornhub: Why Does Canada Allow this Company to Profit off Video of Exploitation and Assault?" *New York Times*, December 4, 2020, <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>.
- <sup>130</sup> Laila Mickelwait, *Take Down: Inside the Fight to Shut Down Pornhub for Child Abuse, Rape, and Sex Trafficking*, (New York: Thesis, Penguin Random House LLC, 2024, 19).
- <sup>131</sup> Sebastian Meineck and Chris Köver, "World's Largest Porn Site: How XVideos Does Very Little against Sexualized Violence," *Netropolitik.org*, March 11, 2022, <https://netropolitik.org/2022/how-xvideos-does-very-little-against-sexualized-violence>.
- <sup>132</sup> Sebastian Meineck and Chris Köver, "World's Largest Porn Site: How XVideos Does Very Little against Sexualized Violence," *Netropolitik.org*, March 11, 2022, <https://netropolitik.org/2022/how-xvideos-does-very-little-against-sexualized-violence>.
- <sup>133</sup> Sebastian Meineck and Chris Köver, "World's Largest Porn Site: How XVideos Does Very Little against Sexualized Violence," *Netropolitik.org*, March 11, 2022, <https://netropolitik.org/2022/how-xvideos-does-very-little-against-sexualized-violence>.
- <sup>134</sup> Fiona Vera-Gray et al., "Sexual Violence as a Sexual Script in Mainstream Online Pornography," *The British Journal of Criminology* (2021): 1-18, <https://doi.org/10.1093/bjc/azab035>.
- <sup>135</sup> Ilir Rama, Lucia Bainotti, Alessandro Gandini, Giulia Giorgi, Silvia Semenzin, Claudio Agosti, Giulia Corona, et al., "The Platformization of Gender and Sexual Identities: An Algorithmic Analysis of Pornhub," *Porn Studies* (2022): 1–20, <https://doi.org/10.1080/23268743.2022.2066566>.
- <sup>136</sup> Antonie Mazieres, et al., "Deep Tags: Toward a Quantitative Analysis of Online Pornography," *Porn Studies* 1, no. 1-2 (2014): 80–95, <https://doi.org/10.1080/23268743.2014.888214>.
- <sup>137</sup> Ilir Rama, Lucia Bainotti, Alessandro Gandini, Giulia Giorgi, Silvia Semenzin, Claudio Agosti, Giulia Corona, et al., "The Platformization of Gender and Sexual Identities: An Algorithmic Analysis of Pornhub," *Porn Studies* (2022): 3, <https://doi.org/10.1080/23268743.2022.2066566>.
- <sup>138</sup> Susanna Paasonen, *Carnal Resonance: Affect and Online Pornography* (Cambridge, MA: The MIT Press, 2011).
- <sup>139</sup> Antonie Mazieres, et al., "Deep Tags: Toward a Quantitative Analysis of Online Pornography," *Porn Studies* 1, no. 1-2 (2014): 80–95, <https://doi.org/10.1080/23268743.2014.888214>.
- <sup>140</sup> Antonie Mazieres, et al., "Deep Tags: Toward a Quantitative Analysis of Online Pornography," *Porn Studies* 1, no. 1-2 (2014): 84, <https://doi.org/10.1080/23268743.2014.888214>.
- <sup>141</sup> Ilir Rama, Lucia Bainotti, Alessandro Gandini, Giulia Giorgi, Silvia Semenzin, Claudio Agosti, Giulia Corona, et al., "The Platformization of Gender and Sexual Identities: An Algorithmic Analysis of Pornhub," *Porn Studies* (2022): 3, <https://doi.org/10.1080/23268743.2022.2066566>.
- <sup>142</sup> Ilir Rama, Lucia Bainotti, Alessandro Gandini, Giulia Giorgi, Silvia Semenzin, Claudio Agosti, Giulia Corona, et al., "The Platformization of Gender and Sexual Identities: An Algorithmic Analysis of Pornhub," *Porn Studies* (2022): 3, <https://doi.org/10.1080/23268743.2022.2066566>.
- <sup>143</sup> Nicola Henry and Asher Flynn, "Image-based Sexual Abuse: Online Distribution Channels and Illicit Communities of Support," *Violence Against Women* 25, no. 16 (2019): 1944, <https://doi.org/10.1177/1077801219863881>.
- <sup>144</sup> Nicola Henry and Asher Flynn, "Image-based Sexual Abuse: Online Distribution Channels and Illicit Communities of Support," *Violence Against Women* 25, no. 16 (2019): 1944, <https://doi.org/10.1177/1077801219863881>.
- <sup>145</sup> Nicholas Kristof, "The Children of Pornhub: Why Does Canada Allow this Company to Profit off Videos of Exploitation and Assault?" *New York Times*, December 4, 2020, <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>.
- <sup>146</sup> Pornhub, "2024 Transparency Report (Second Half)," n.d. Note: We do not provide URLs which link to pornography sites.
- <sup>147</sup> Antoinette Raffaella Huber and Zara Ward, "Non-consensual Intimate Image Distribution: Nature, Removal, and Implications for the Online Safety Act," *European Journal of Criminology* (2024): 1–21, <https://doi.org/10.1177/14773708241255821>.
- <sup>148</sup> Antoinette Raffaella Huber and Zara Ward, "Non-consensual Intimate Image Distribution: Nature, Removal, and Implications for the Online Safety Act," *European Journal of Criminology* (2024): 1–21, <https://doi.org/10.1177/14773708241255821>.
- <sup>149</sup> Antoinette Raffaella Huber and Zara Ward, "Non-consensual Intimate Image Distribution: Nature, Removal, and Implications for the Online Safety Act," *European Journal of Criminology* (2024): 1–21, <https://doi.org/10.1177/14773708241255821>.
- <sup>150</sup> Antoinette Raffaella Huber and Zara Ward, "Non-consensual Intimate Image Distribution: Nature, Removal, and Implications for the Online Safety Act," *European Journal of Criminology* (2024): 1–21, <https://doi.org/10.1177/14773708241255821>.
- <sup>151</sup> Antoinette Raffaella Huber and Zara Ward, "Non-consensual Intimate Image Distribution: Nature, Removal, and Implications for the Online Safety Act," *European Journal of Criminology* (2024): 1–21, <https://doi.org/10.1177/14773708241255821>.
- <sup>152</sup> Ryan Chatelain and Associated Press, "Pornhub Removes 10 Million Videos in Response to Allegations about Content," *Spectrum News NY1*, December 15, 2020, <https://www.ny1.com/nyc/all-boroughs/entertainment/2020/12/15/pornhub-removes-10-million-videos-in-response-to-allegations-about-content>.
- <sup>153</sup> Ryan Chatelain and Associated Press, "Pornhub Removes 10 Million Videos in Response to Allegations about Content," *Spectrum News NY1*, December 15, 2020, <https://www.ny1.com/nyc/all-boroughs/entertainment/2020/12/15/pornhub-removes-10-million-videos-in-response-to-allegations-about-content>. See also, Nicholas Kristof, "The Children of Pornhub: Why Does Canada Allow this Company to Profit Off Videos of Exploitation and Assault?" *New York Times*, December 4, 2020, <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>.
- <sup>154</sup> Haley McNamara, "Mastercard Receives Corporate Leadership Award for New Policies," *National Center on Sexual Exploitation*, July 24, 2021, <https://endsexualexploitation.org/articles/corporate-leadership-award-mastercard>; Jake Roberson, "Pornhub Falling: Visa and Mastercard Cut Ties with MindGeek's Cash Cow," *National Center on Sexual Exploitation*, December 11, 2020; <https://endsexualexploitation.org/articles/pornhub-falling-visa-and-mastercard-cut-ties-with-mindgeeks-cash-cow>; Gillian Friedman, "Mastercard and Visa Stop Allowing Their Cards to be Used on Pornhub," *New York Times*, December 10, 2020, <https://www.nytimes.com/2020/12/10/business/visa-mastercard-block-pornhub.html>.



## Part X: Endnotes (Continued)

- <sup>155</sup> Russell Brandom, "Pornhub Limits Uploads and Disables Downloads after *New York Times* Exposé," *The Verge*, December 3, 2020, <https://www.theverge.com/2020/12/8/22164031/pornhub-upload-limit-blocked-download-nyt-kristof-child-abuse>; Ryan Chatelain and Associated Press, "Pornhub Removes 10 Million Videos in Response to Allegations about Content," *Spectrum News NY1*, December 15, 2020, <https://www.ny1.com/nyc/all-boroughs/entertainment/2020/12/15/pornhub-removes-10-million-videos-in-response-to-allegations-about-content>; Eshe Nelson, "Visa and Mastercard to Investigate Financial Ties to Pornhub," *New York Times*, December 7, 2020, <https://www.nytimes.com/2020/12/07/business/visa-mastercard-pornhub.html>; [SoundInvestigations.com](https://www.soundinvestigations.com), "PART 2 Pornhub Exec on Sex Abuse Victim: 'We Weren't Taking It Seriously'" September 20, 2023.
- <sup>156</sup> American Psychological Association, *APA Dictionary of Psychology*, April 19, 2018, edition, s.v. "Voyeurism," <https://dictionary.apa.org/voyeurism> (accessed April 2, 2025).
- <sup>157</sup> Donna M. Hughes, "Prostitution Online," *Journal of Trauma Practice* 2, no. 3/4 (2003): 115–131, [https://doi.org/10.1300/J189v02n03\\_06](https://doi.org/10.1300/J189v02n03_06).
- <sup>158</sup> American Psychological Association, *APA Dictionary of Psychology*, April 19, 2018, edition, s.v. "Scopophilia," <https://dictionary.apa.org/voyeurism> (accessed April 7, 2025).
- <sup>159</sup> Silvia Rodeschini, "New Standards of Respectability in Contemporary Pornography: Pornhub's Corporate Communication," *Porn Studies* 8, no. 1 (2021): 76–91, <https://doi.org/10.1080/23268743.2020.1788976>.
- <sup>160</sup> Patrick Keilty, "Desire by Design: Pornography as Technology Industry," *Porn Studies* 5, no. 3 (2018): p. 338, <https://doi.org/10.1080/23268743.2018.1483208>. See also Susanna Paasonen, *Carnal Resonance: Affect and Online Pornography* (Cambridge, MA: The MIT Press, 2011), p. 33.
- <sup>161</sup> Patricia Nilsson, "MindGeek: The Secretive Owner of Pornhub and RedTube," *Financial Times*, December 17, 2020, <https://www.ft.com/content/b50dc0a4-54a3-4ef6-88e0-3187511a67a2>.
- <sup>162</sup> Patrick Keilty, "Desire by Design: Pornography as Technology Industry," *Porn Studies* 5, no. 3 (2018), 338–342, <https://doi.org/10.1080/23268743.2018.1483208>.
- <sup>163</sup> Patrick Keilty, "Desire by Design: Pornography as Technology Industry," *Porn Studies* 5, no. 3 (2018), 338–342, <https://doi.org/10.1080/23268743.2018.1483208>.
- <sup>164</sup> Sam Harton, "The Porn Industry Leads Streaming Services in User Data Mining (UPDATED)," *MyTechDecisions.com*, January 2, 2019, <https://mytechdecisions.com/compliance/the-porn-industry-leads-streaming-services-in-user-data-mining>.
- <sup>165</sup> Kal Raustiala and Christopher Jon Sprigman, "The Second Digital Disruption: Streaming and the Dawn of Data-Driven Creativity," *New York University Law Review* 94, no. 6 (2019): 1555–1622, [dx.doi.org/10.2139/ssrn.3226566](https://doi.org/10.2139/ssrn.3226566); Aisha Hassan, "Porn Sites Collect More User Data than Netflix or Hulu. This is What They Do with It," *Quartz*, December 13, 2018, <https://qz.com/1407235/porn-sites-collect-more-user-data-than-netflix-or-hulu-this-is-what-they-do-with-it>.
- <sup>166</sup> Jennifer Johnson, "Mapping the Feminist Political Economy of the Online Commercial Pornography Industry: A Network Approach," *International Journal of Media and Cultural Politics* 7, no. 2 (2011): 189–208, [https://doi.org/10.1386/macp.7.2.189\\_1](https://doi.org/10.1386/macp.7.2.189_1).
- <sup>167</sup> Patrick Keilty, "Desire by Design: Pornography as Technology Industry," *Porn Studies* 5, no. 3 (2018): 339, <https://doi.org/10.1080/23268743.2018.1483208>.
- <sup>168</sup> Aisha Hassan, "Porn Sites Collect More User Data than Netflix or Hulu. This is What They Do with It," *Quartz*, December 13, 2018, <https://qz.com/1407235/porn-sites-collect-more-user-data-than-netflix-or-hulu-this-is-what-they-do-with-it>.
- <sup>169</sup> Ariel Nathanson, "Psychotherapy with Young People Addicted to Internet Pornography," *The Psychoanalytic Study of the Child* 74, no. 1 (2021): 160–173, <https://doi.org/10.1080/00797308.2020.1859286>.
- <sup>170</sup> Patrick Keilty, "Desire by Design: Pornography as Technology Industry," *Porn Studies* 5, no. 3 (2018): 339, <https://doi.org/10.1080/23268743.2018.1483208>.
- <sup>171</sup> Alien Wéry and Joel Billieux, "Online Sexual Activities: An Exploratory Study of Problematic and Non-problematic Usage Patterns in a Sample of Men," *Computers in Human Behavior* 56 (2016): 257–266, <https://doi.org/10.1016.chb.2015.11.046>.
- <sup>172</sup> Debby Herbenick, et al., "Diverse Sexual Behaviors and Pornography Use: Findings from a Nationally Representative Probability Survey of Americans Aged 18 to 60 Years," *The Journal of Sexual Medicine* 17, no. 4 (2020): 623–633, <https://doi.org/10.1016/j.jsxm.2020.01.013>.
- <sup>173</sup> Simone Kühn and Jürgen Gallinat, "Brain Structure and Functional Connectivity Associated with Pornography Consumption: The Brain on Porn," *JAMA Psychiatry* 71, no. 7 (2014): 827–834, [doi:10.1001/jamapsychiatry.2014.93](https://doi.org/10.1001/jamapsychiatry.2014.93); Steven E. Hyman, Robert C. Malenka, and Eric J. Nestler, "Neural Mechanisms of Addiction: The Role of Reward-Related Learning and Memory" *The Annual Review of Neuroscience* 29 (2006): 565–598, [doi:10.1146/annurev.neuro.29.051605.113009](https://doi.org/10.1146/annurev.neuro.29.051605.113009).
- <sup>174</sup> Max Planck Institute for Human Development, "Viewers of Pornography Have a Smaller Reward System: Study Shows a Connection between Consumption and Brain Structure," June 2, 2014, [www.mpib-berlin.mpg.de/press-releases/pornography-is-a-social-taboo](https://www.mpib-berlin.mpg.de/press-releases/pornography-is-a-social-taboo).
- <sup>175</sup> Raustiala and Sprigman, "The Second Digital Disruption," *ibid*, 1579.
- <sup>176</sup> Laura McVey, Meagan Tyler, and Lauren Gurrieri, "'Care' as Camouflaging Capitalism and Obscuring Harm: The User-Generated Pornography Market and Women's Inequality," *Women's Studies International Forum* 91 (2022), <https://doi.org/10.1016/j.wsif.2022.102573>.
- <sup>177</sup> Raustiala and Sprigman, "The Second Digital Disruption," *ibid*.
- <sup>178</sup> Standing Committee on Access to Information, Privacy and Ethics, Canada House of Commons, *Ensuring the Protection of Privacy and Reputation on Platforms Such as Pornhub. Report of the Standing Committee on Access to Information, Privacy and Ethics* (June 2021, 43rd Parliament, 2nd Session), <https://www.ourcommons.ca/Content/Committee/432/ETHI/Reports/RP11148202/ethirp03/ethirp03-e.pdf>.
- <sup>179</sup> Gordon Deegan, "Grant Thornton Resigns as Auditor to Firms Owned by Pornhub Operator," *Irish Times*, February 19, 2021, <https://www.irishtimes.com/business/economy/grant-thornton-resigns-as-auditor-to-firms-owned-by-pornhub-operator-1.4480517#YCMd5f48f6s.twitter>.
- <sup>180</sup> The Federal, "Pornhub Parent Mindgeek Bought by Canadian PE Firm Ethical Capital," *The Federal*, March 16, 2023, <https://thefederal.com/business/pornhub-parent-mindgeek-bought-by-canadian-pe-firm-ethical-capital>.
- <sup>181</sup> WorthofWeb.com, "XVideos," "Pornhub," "xHamster," and "XNXX," 2022, <https://www.worthofweb.com> (accessed March 6, 2024).
- <sup>182</sup> Kari Paul, "Pornhub Removes Millions of Videos after Investigation Finds Child Abuse Content," *The Guardian*, December 14, 2020, <https://www.theguardian.com/technology/2020/dec/14/pornhub-purge-removes-unverified-videos-investigation-child-abuse>.



## Part X: Endnotes (Continued)

- <sup>183</sup> Data collected from 2017, 2018, and 2019 Pornhub *Year in Review* reports; 2020, 2021, 2022, 2023, and 2024 Pornhub *Transparency Reports*; Russell Brandom, "Pornhub Limits Uploads and Disables Downloads after *New York Times* Esposé," *The Verge*, December 3, 2020, <https://www.theverge.com/2020/12/8/22164031/pornhub-upload-limit-blocked-download-nyt-kristof-child-abuse>; Ryan Chatelain and Associated Press, "Pornhub Removes 10 Million Videos in Response to Allegations about Content," *Spectrum News NY1*, December 15, 2020, <https://www.ny1.com/nyc/all-boroughs/entertainment/2020/12/15/pornhub-removes-10-million-videos-in-response-to-allegations-about-content>.
- <sup>184</sup> Joe Castaldo, "Lifting the Veil of Secrecy on MindGeek's Online Pornography Empire," *Globe and Mail*, February 4, 2021, <https://www.theglobeandmail.com/business/article-mindgeeks-business-practices-under-scrutiny-as-political-pressure>; Sebastian Meineck and Chris Köver, "How XVideos Does Very Little against Sexualized Violence," *Netpolitik.org*, March 11, 2022, <https://netzpolitik.org/2022/how-xvideos-does-very-little-against-sexualized-violence>; Nathan Munn, "Inside Pornhub," *The Verge*, February 23, 2022, <https://www.theverge.com/c/22925906/pornhub-mindgeek-content-moderation>.
- <sup>185</sup> Samantha Cole, "In a Huge Policy Shift, Pornhub Bans Unverified Uploads," *Vice*, December 8, 2020, <https://www.vice.com/en/article/v7m7k8/pornhub-banned-uploads-policy-change>.
- <sup>186</sup> Soundinvestigations.com, "Pornhub Exec: Rapists, Traffickers Using Pornhub 'Loophole' to 'Make a Lot of Money,'" September 13, 2023, <https://soundinvestigations.com/pornhub-loophole>.
- <sup>187</sup> Soundinvestigations.com, "Pornhub Ad Network Engineer: 'Revenge porn: They Didn't Give a F\*\*k,'" November 29, 2023, <https://soundinvestigations.com>.
- <sup>188</sup> Michael McGrady, Jr. "Pornhub Tapes' Group Releases 4th Entry, Targets TrafficJunky," *Adult Video News*, November 2, 2023. Note: We do not provide URLs to websites which link to pornography sites.
- <sup>189</sup> Michael McGrady, Jr. "Pornhub Tapes' Group Releases 4th Entry, Targets TrafficJunky," *Adult Video News*, November 2, 2023. Note: We do not provide URLs to websites which link to pornography sites.
- <sup>190</sup> Soundinvestigations.com, "PART 2 Pornhub Exec on Sex Abuse Victim: 'We Weren't Taking It Seriously'" September 20, 2023, <https://soundinvestigations.com/moderation-failures>.
- <sup>191</sup> Soundinvestigations.com, "Pornhub Ad Network Engineer: 'Revenge porn: They Didn't Give a F\*\*k,'" November 29, 2023, <https://soundinvestigations.com>.
- <sup>192</sup> Soundinvestigations.com, "Pornhub Ad Network Engineer: 'Revenge porn: They Didn't Give a F\*\*k,'" November 29, 2023, <https://soundinvestigations.com>.
- <sup>193</sup> Soundinvestigations.com, "Pornhub Ad Network Engineer: 'Revenge porn: They Didn't Give a F\*\*k,'" November 29, 2023, <https://soundinvestigations.com>.
- <sup>194</sup> Mark Hay, "Pornhub Deleted Millions of Videos. And then What Happened?" *Mashable*, September 3, 2021, <https://mashable.com/article/pornhub-verification-changes>.
- <sup>195</sup> Gareth Tyson, et al., "Are People Really Social on Porn 2.0?" *Proceedings of the Ninth International Association for the Advancement of Artificial Intelligence Conference on Web and Social Media 9*, no. 1 (2015), <https://ojs.aaai.org/index.php/ICWSM/article/view/14601>.
- <sup>196</sup> Ibid.
- <sup>197</sup> Sebastian Meineck and Chris Köver, "How XVideos Does Very Little against Sexualized Violence," *Netzpolitik.com*, November 3, 2022, <https://netzpolitik.org/2022/how-xvideos-does-very-little-against-sexualized-violence>.
- <sup>198</sup> "Could XVideos Cause the End of All Adult Production," *MikeSouth.com*, October 13, 2022.
- <sup>199</sup> Sebastian Meineck and Yannah Alfering, "Inside xHamster: Undercover in the Firefighting Team of Germany's Most Visited Porn Site," *Vice*, October 27, 2020, <https://www.vice.com/de/article/akdzdp/inside-xhamster-undercover-im-loeschteam-der-pornoseite>.
- <sup>200</sup> Standing Committee on Access to Information, Privacy and Ethics, Canada House of Commons, *Ensuring the Protection of Privacy and Reputation on Platforms Such as Pornhub. Report of the Standing Committee on Access to Information, Privacy and Ethics* (June 2021, 43rd Parliament, 2nd Session), <https://www.ourcommons.ca/Content/Committee/432/ETHI/Reports/RP11148202/ethirp03/ethirp03-e.pdf>; Nicholas Kristof, "The Children of Pornhub. Why Does Canada Allow this Company to Profit off Videos of Exploitation and Assault?" *New York Times*, December 4, 2020, <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>.
- <sup>201</sup> Standing Committee on Access to Information, Privacy and Ethics, Canada House of Commons, *Ensuring the Protection of Privacy and Reputation on Platforms Such as Pornhub. Report of the Standing Committee on Access to Information, Privacy and Ethics* (June 2021, 43rd Parliament, 2nd Session), <https://www.ourcommons.ca/Content/Committee/432/ETHI/Reports/RP11148202/ethirp03/ethirp03-e.pdf>; Nicholas Kristof, "The Children of Pornhub. Why Does Canada Allow this Company to Profit off Videos of Exploitation and Assault?" *New York Times*, December 4, 2020, <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>.
- <sup>202</sup> Pornhub Help Center, "Can I Download Videos," Pornhub.com, (accessed December 19, 2023). Screenshot of page available upon request.
- <sup>203</sup> Pornhub Help Center, "Can I Download Videos," Pornhub.com (accessed March 5, 2025).
- <sup>204</sup> *Evidence No. 19*, Standing Committee on Access to Information, Privacy and Ethics, House of Commons, Canada, (43rd Parliament, 2nd Session, February 5, 2021), p. 3, <https://www.ourcommons.ca/DocumentViewer/en/43-2/ETHI/meeting-19/evidence> (accessed November 16, 2023).
- <sup>205</sup> Pornhub, "The 2019 Year in Review," December 11, 2019.
- <sup>206</sup> Joe Castaldo, "Lifting the Veil of Secrecy on MindGeek's Online Pornography Empire," *Globe and Mail*, February 4, 2021, <https://www.theglobeandmail.com/business/article-mindgeeks-business-practices-under-scrutiny-as-political-pressure>.
- <sup>207</sup> Dailymail.com Reporter, "Our Job Was to Find Weird Excuses Not to Remove Them': Pornhub Moderators, Who Watched 1,200 videos A DAY, Reveal Lenient Guidelines at the Site Being Sued for \$80M for 'Profiting from Sex Trafficking,'" *DailyMail.com*, December 17, 2020, <https://www.dailymail.co.uk/news/article-9065059/Ex-PornHub-moderators-reveal-life-inside-explicit-video-site-sued-80m.html>.

## Part X: Endnotes (Continued)

- <sup>208</sup> Joe Castaldo, "Lifting the Veil of Secrecy on MindGeek's Online Pornography Empire, *Globe and Mail*, February 4, 2021, <https://www.theglobeandmail.com/business/article-mindgeeks-business-practices-under-scrutiny-as-political-pressure>; DailyMail.com Reporter, "Our Job Was to Find Weird Excuses Not to Remove Them': Pornhub Moderators, Who Watched 1,200 videos A DAY, Reveal Lenient Guidelines at the Site Being Sued for \$80M for 'Profiting from Sex Trafficking,'" *DailyMail.com*, December 17, 2020, <https://www.dailymail.co.uk/news/article-9065059/Ex-PornHub-moderators-reveal-life-inside-explicit-video-site-sued-80m.html>.
- <sup>209</sup> Soundinvestigations.com, "PART 2 Pornhub Exec on Sex Abuse Victim: 'We Weren't Taking It Seriously'" September 20, 2023, (accessed November 1, 2023).
- <sup>210</sup> *Evidence No. 19*, Standing Committee on Access to Information, Privacy and Ethics, House of Commons, Canada, (43rd Parliament, 2nd Session, February 5, 2021), p. 3, <https://www.ourcommons.ca/DocumentViewer/en/43-2/ETHI/meeting-19/evidence> (accessed November 16, 2023).
- <sup>211</sup> *Money Shot: The Pornhub Story*, directed by Suzanne Hillinger (New York: NY, Jigsaw Productions, 2023), <https://www.imdb.com/title/tt26739529/> (accessed December 14, 2023).
- <sup>212</sup> Nicholas Kristof, "The Children of Pornhub. Why Does Canada Allow this Company to Profit off Videos of Exploitation and Assault?" *New York Times*, December 4, 2020, <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>.
- <sup>213</sup> John Koetsier, "Report: Facebook Makes 300,000 Content Moderation Mistakes Every Day," *Forbes*, June 9, 2020, <https://www.forbes.com/sites/johnkoetsier/2020/06/09/300000-facebook-content-moderation-mistakes-daily-report-says/?sh=23a98f1554d0>.
- <sup>214</sup> Laila Mickelwait, X Post, September 2, 2023, 1:29 PM, <https://twitter.com/LailaMickelwait/status/1698025298242179522>.
- <sup>215</sup> Laila Mickelwait, X Post, September 2, 2023, 1:29 PM, <https://twitter.com/LailaMickelwait/status/1698025298242179522>.
- <sup>216</sup> Laila Mickelwait, X Post, September 2, 2023, 1:29 PM, <https://twitter.com/LailaMickelwait/status/1698025298242179522>.
- <sup>217</sup> Statista, "Non-consensual Content Removal from Pornhub in 2022, by Source of Removal," May 8, 2023, <https://www.statista.com/statistics/1362002/pornhub-non-consensual-content-removal-source/>.
- <sup>218</sup> Laila Mickelwait, "Shut Down Pornhub and Hold Its Executives Accountable for Aiding Trafficking," [Traffickinghubpetition.com](https://traffickinghubpetition.com) (accessed April 4, 2024).
- <sup>219</sup> Lina Nealon, "Pornhub Just Got Kicked Off Instagram, YouTube, and TikTok — Here's Why," *National Center on Sexual Exploitation*, December 20, 2022, <https://endsexualexploitation.org/articles/pornhub-just-got-kicked-off-instagram-youtube-and-tiktok-heres-why>.
- <sup>220</sup> [Soundinvestigations.com](https://soundinvestigations.com) (accessed April 4, 2024).
- <sup>221</sup> NCOSE, "The REAL Pornhub Year in Review 2023," *National Center on Sexual Exploitation*, December 16, 2023, <https://endsexualexploitation.org/articles/the-real-pornhub-year-in-review-2023>.
- <sup>222</sup> Anna Iovine, "Pornhub Will Require Proof of Consent from All Performers," *Mashable*, January 19, 2024, <https://mashable.com/article/pornhub-will-require-proof-of-consent-from-all-performers>.
- <sup>223</sup> Anna Iovine, "Pornhub Will Require Proof of Consent from All Performers," *Mashable*, January 19, 2024, <https://mashable.com/article/pornhub-will-require-proof-of-consent-from-all-performers>.
- <sup>224</sup> Nicholas Kristof, "Why Do We Let Corporations Profit from Rape Videos?" *New York Times*, April 16, 2021, <https://www.nytimes.com/2021/04/16/opinion/sunday/companies-online-rape-videos.html>.
- <sup>225</sup> Standing Committee on Access to Information, Privacy and Ethics, Canada House of Commons, *Evidence*, Friday, February 12, 2021, 43rd Parliament, 2nd Session, Number 020, <https://www.ourcommons.ca/DocumentViewer/en/43-2/ETHI/meeting-20/evidence#Int-11141711> (accessed March 4, 2025).
- <sup>226</sup> Carolyn A. Uhl, Katlin J. Rhyner, Cheryl A. Terrance, and Noël R. Lugo, "An Examination of Nonconsensual Pornography Websites," *Feminism & Psychology* 28, no. 1 (2018): 63, <https://doi.org/10.1177/0959353517720225>.
- <sup>227</sup> Nathan Munn, "Inside Pornhub," *The Verge*, February 23, 2022, <https://www.theverge.com/c/22925906/pornhub-mindgeek-content-moderation>.
- <sup>228</sup> Holly Jacobs, "Being a Victim of Revenge Porn Forced Me to Change My Name," *Thought Catalog*, November 27, 2013, <https://thoughtcatalog.com/dr-holly-jacobs/2013/11/being-a-victim-of-revenge-porn-forced-me-to-change-my-name>.
- <sup>229</sup> Clare McGlynn, et al., *Shattering Lives and Myths: A Report on Image-based Sexual Abuse*, (Australian Government, Australian Research Council, 2019), <https://durham-repository.worktribe.com/output/1605209/> (accessed February 27, 2024).
- <sup>230</sup> SoundInvestigations.com, "Former Aylo Compliance Employee Reveals 'So Much Room for Error' in Unverified Porn Ads," <https://soundinvestigations.com/unverified-ads/> (accessed November 1, 2023).
- <sup>231</sup> Annie Lord "Porn Doesn't Suffer from a 'Piracy Problem', It Actively Relies Upon It" *Vice*, September 3, 2019, <https://www.vice.com/en/article/free-youporn-redtube-pornhub-piracy-alessa-savage-ukcutegirl>.
- <sup>232</sup> Patricia Nilsson, "MindGeek: the Secretive Owner of Pornhub and RedTube" *Financial Times*, December 17, 2020, <https://www.ft.com/content/b50dc0a4-54a3-4ef6-88e0-3187511a67a2>.
- <sup>233</sup> Kal Raustiala and Christopher Jon Sprigman, "The Second Digital Disruption: Streaming and the Dawn of Data-Driven Creativity," *New York University Law Review* 94, no. 6 (2019): 1555–1622, [dx.doi.org/10.2139/ssrn.3226566](https://doi.org/10.2139/ssrn.3226566).
- <sup>234</sup> Siri, "Who Owns and Operates Major Porn Tube Sites?" *Quora*, February 24, 2014, <https://www.quora.com/Who-owns-and-operates-major-porn-tube-sites-Do-these-sites-have-legitimate-investors-or-are-they-sort-of-mom-and-pop-shops-with-possible-gang-connections-or-operating-illegally-Is-there-any-good-investigative-journalism-on-this-topic/answer/Siri-4>.
- <sup>235</sup> Siri, "Most tube sites have a page like this:" response to subquestion by Ashish Datta, "What Does the Process Look Like to Request a Take a Take Down?" under question by Siri, "Who Owns and Operates Major Porn Tube Sites?" *Quora*, February 24, 2014, <https://www.quora.com/Who-owns-and-operates-major-porn-tube-sites-Do-these-sites-have-legitimate-investors-or-are-they-sort-of-mom-and-pop-shops-with-possible-gang-connections-or-operating-illegally-Is-there-any-good-investigative-journalism-on-this-topic/answer/Siri-4>.
- <sup>236</sup> Jacob Kastrenakes and Megan Farokhmanesh, "OnlyFans Say It Wasn't Hacked after Hundreds of Performers' Videos Leak Online," *The Verge*, February 27, 2020, <https://www.theverge.com/2020/2/27/21156445/onlyfans-leak-not-hacked-photos-videos>.
- <sup>237</sup> Jacob Kastrenakes and Megan Farokhmanesh, "OnlyFans Say It Wasn't Hacked after Hundreds of Performers' Videos Leak Online," *The Verge*, February 27, 2020, <https://www.theverge.com/2020/2/27/21156445/onlyfans-leak-not-hacked-photos-videos>.

## Part X: Endnotes (Continued)

- <sup>238</sup> Samantha Cole and Joseph Cox, "Inside the Underground Trade of Pirated OnlyFans Porn," *Vice*, June 17, 2020, <https://www.vice.com/en/article/5dz3xa/onlyfans-pirated-porn-scraper-leak>.
- <sup>239</sup> Samantha Cole and Joseph Cox, "Inside the Underground Trade of Pirated OnlyFans Porn," *Vice*, June 17, 2020, <https://www.vice.com/en/article/5dz3xa/onlyfans-pirated-porn-scraper-leak>.
- <sup>240</sup> Culture Reframed, *OnlyFans is Only Porn: The Online Ecosystem of Webcamming and OnlyFans*, n.d., 4, [https://culturereframed.org/wp-content/uploads/2023/04/culture-reframed\\_whitepaper\\_022023\\_draft2.pdf](https://culturereframed.org/wp-content/uploads/2023/04/culture-reframed_whitepaper_022023_draft2.pdf) (accessed April 16, 2024).
- <sup>241</sup> Patricia Nilsson and Alex Barker, "Hot Money Podcast: Porn Power, & Profit. Episode 7: How OnlyFans Changed Porn," *Financial Times*, podcast transcript, January 19, 2023, <https://www.ft.com/content/d4def67c-6b31-4868-a930-842fb2d1253d>.
- <sup>242</sup> Culture Reframed, *OnlyFans is Only Porn: The Online Ecosystem of Webcamming and OnlyFans*, n.d., [https://culturereframed.org/wp-content/uploads/2023/04/culture-reframed\\_whitepaper\\_022023\\_draft2.pdf](https://culturereframed.org/wp-content/uploads/2023/04/culture-reframed_whitepaper_022023_draft2.pdf) (accessed April 16, 2024).
- <sup>243</sup> Jim Waterson, "OnlyFans Profits Boom as Users Spent \$4.8bn on Platform Last Year," *The Guardian*, September 1, 2022, <https://www.theguardian.com/business/2022/sep/01/onlyfans-profits-boom-as-users-spent-48bn-on-platform-last-year>.
- <sup>244</sup> Patricia Nilsson and Alex Barker, "Hot Money Podcast: Porn Power, & Profit. Episode 7: How OnlyFans Changed Porn," *Financial Times*, podcast transcript, January 19, 2023, <https://www.ft.com/content/d4def67c-6b31-4868-a930-842fb2d1253d>.
- <sup>245</sup> Patricia Nilsson and Alex Barker, "Hot Money Podcast: Porn Power, & Profit. Episode 7: How OnlyFans Changed Porn," *Financial Times*, podcast transcript, January 19, 2023, <https://www.ft.com/content/d4def67c-6b31-4868-a930-842fb2d1253d>.
- <sup>246</sup> Thomas Brewster and David Dawkins, "The Shady, Secret History of OnlyFans' Billionaire Owner," *Forbes*, June 16, 2021, <https://www.forbes.com/sites/thomasbrewster/2021/06/16/the-shady-secret-history-of-onlyfans-billionaire-owner/?sh=6e41adef5c17>.
- <sup>247</sup> Thomas Brewster and David Dawkins, "The Shady, Secret History of OnlyFans' Billionaire Owner," *Forbes*, June 16, 2021, <https://www.forbes.com/sites/thomasbrewster/2021/06/16/the-shady-secret-history-of-onlyfans-billionaire-owner/?sh=6e41adef5c17>.
- <sup>248</sup> Thomas Brewster and David Dawkins, "The Shady, Secret History of OnlyFans' Billionaire Owner," *Forbes*, June 16, 2021, <https://www.forbes.com/sites/thomasbrewster/2021/06/16/the-shady-secret-history-of-onlyfans-billionaire-owner/?sh=6e41adef5c17>.
- <sup>249</sup> Rupert Neate, "OnlyFans Owner Pays Himself \$1.3m a Day from UK-based Adult Content Site," *The Guardian*, August 24, 2023, <https://www.theguardian.com/business/2023/aug/24/onlyfans-owner-leonid-radvinsky-pays-himself-338m-in-dividends>.
- <sup>250</sup> Jim Waterson, "OnlyFans Profits Boom as Users Spent \$4.8bn on Platform Last Year," *The Guardian*, September 1, 2022, <https://www.theguardian.com/business/2022/sep/01/onlyfans-profits-boom-as-users-spent-48bn-on-platform-last-year>.
- <sup>251</sup> Sex Work CEOs, *SWCEO's 2022 State of the Creator*, <https://www.sexworkceo.com/creator-report> (accessed April 16, 2024).
- <sup>252</sup> Culture Reframed, *OnlyFans is Only Porn: The Online Ecosystem of Webcamming and OnlyFans*, n.d., 3, [https://culturereframed.org/wp-content/uploads/2023/04/culture-reframed\\_whitepaper\\_022023\\_draft2.pdf](https://culturereframed.org/wp-content/uploads/2023/04/culture-reframed_whitepaper_022023_draft2.pdf) (accessed April 16, 2024).
- <sup>253</sup> Culture Reframed, *OnlyFans is Only Porn: The Online Ecosystem of Webcamming and OnlyFans*, n.d., [https://culturereframed.org/wp-content/uploads/2023/04/culture-reframed\\_whitepaper\\_022023\\_draft2.pdf](https://culturereframed.org/wp-content/uploads/2023/04/culture-reframed_whitepaper_022023_draft2.pdf) (accessed April 16, 2024).
- <sup>254</sup> Jyoti Mann, "OnlyFans CEO Call the Site 'Truly the Safest and Most Inclusive Social-Media Platform' after Claims that Child-abuse Images Originated on It," *Business Insider*, October 27, 2022, <https://www.businessinsider.com/onlyfans-ceo-says-it-is-the-safest-platform-2022-10>.
- <sup>255</sup> Demeter Stamell, "Online Expert Warns OnlyFans Models are Getting 'Doxxed' As Creeps Track Them Down and Threaten Extortion," *Daily Mail*, March 11, 2022, <https://www.dailymail.co.uk/tvshowbiz/article-10601343/Australian-online-expert-warns-OnlyFans-models-getting-doxxed.html>.
- <sup>256</sup> Megan Lundstrom, *OnlyFans: A Case Study of Exploitation in the Digital Age* (The Avery Center, December 2021); NBC 4 New York, "Couple Snared in 'Horrific' Multi-state Sex Trafficking Ring: Manhattan DA," June 29, 2022, <https://www.nbcnewyork.com/news/local/crime-and-courts/couple-violently-forced-women-into-sex-trafficking-ring-post-videos-on-onlyfans-da/3755674>; Noel Titheradge and Rianna Croxford, "The Children Selling Explicit Videos on OnlyFans," *BBC*, May 26, 2021, <https://www.bbc.com/news/uk-57255983>; Michael Gwillam, "OnlyFans Star under Fire for Filming Video with Minor and Hoping He 'Enjoyed Himself,'" *Dextero*, April 20, 2023, <https://www.dextero.com/entertainment/onlyfans-star-under-fire-for-filming-video-with-minor-and-hoping-he-enjoyed-himself-2120782>.
- <sup>257</sup> Noel Titheradge and Rianna Croxford, "The Children Selling Explicit Videos on OnlyFans," *BBC*, May 26, 2021, <https://www.bbc.com/news/uk-57255983>; Noel Titheradge, "Young Children Exploited on OnlyFans says US Agent," *BBC*, October 26, 2022, <https://www.bbc.com/news/uk-63249018>; Sean Philip Cotter, "Brockton Coach Accused of Posting Child Rape on OnlyFans Ordered to Stay Out of Boston," *Boston Herald*, June 18, 2021, <https://www.bostonherald.com/2021/06/18/brockton-coach-accused-of-posting-child-rape-on-onlyfans-ordered-to-stay-out-of-boston>.
- <sup>258</sup> Linda So, Andrew RC Marshall, and Jason Szep, "OnlyFans Exposed," *Reuters*, March 13, 2024, <https://www.reuters.com/investigates/special-report/onlyfans-sex-legal-cases>.
- <sup>259</sup> Linda So, Andrew RC Marshall, and Jason Szep, "OnlyFans Exposed," *Reuters*, March 13, 2024, <https://www.reuters.com/investigates/special-report/onlyfans-sex-legal-cases>.
- <sup>260</sup> Linda So, Andrew RC Marshall, and Jason Szep, "OnlyFans Exposed," *Reuters*, March 13, 2024, <https://www.reuters.com/investigates/special-report/onlyfans-sex-legal-cases>.
- <sup>261</sup> Annie Lord, "Porn Doesn't Suffer from a 'Piracy Problem', It Actively Relies Upon It," *Vice*, September 3, 2019, <https://www.vice.com/en/article/kz4899/free-youporn-redtube-pornhub-piracy-alessa-savage-ukcutegirl>.
- <sup>262</sup> VanillaMachiato, "Stolen Content?" Reddit, September 5, 2020, [https://www.reddit.com/r/onlyfansadvice/comments/in3gkw/stolen\\_content/?force\\_seo=1](https://www.reddit.com/r/onlyfansadvice/comments/in3gkw/stolen_content/?force_seo=1).
- <sup>263</sup> itmetheo, "Legal Advice Onlyfans Related , Stolen Pictures Reuploaded to a Different Website," Reddit, January 25, 2021, [https://www.reddit.com/r/LegalAdviceUK/comments/l4vfc7/legal\\_advice\\_onlyfans\\_related\\_stolen\\_pictures/](https://www.reddit.com/r/LegalAdviceUK/comments/l4vfc7/legal_advice_onlyfans_related_stolen_pictures/).
- <sup>264</sup> David Auerback, "Vampire Porn. MindGeek is a Cautionary Tale of Consolidating Production and Distribution in a Single, Monopolistic Owner," *Slate*, October 23, 2014, <https://slate.com/technology/2014/10/mindgeek-porn-monopoly-its-dominance-is-a-cautionary-tale-for-other-industries.html>; Bonnie Ruberg, "Doing It for Free: Digital Labour and the Fantasy of Amateur Online Pornography," *Porn Studies* 3, no. 2 (2016): 147–159, <http://dx.doi.org/10.1080/23268743.2016.1184477>; Patricia Nilsson, "MindGeek: the Secretive Owner of Pornhub and RedTube" *Financial Times*, December 17, 2020, <https://www.ft.com/content/b50dc0a4-54a3-4ef6-88e0-3187511a67a2>.



## Part X: Endnotes (Continued)

- <sup>265</sup> MG Premium Ltd. v. Hoi, No. 2:23-cv-00349 (C.D. Cal. Nov. 6, 2023), 2023 WL 8895698, <https://www.courtlistener.com/docket/66740576/1/mg-premium-ltd-v-nguyen-hoi/> (accessed February 13, 2025).
- <sup>266</sup> Order for Default J., MG Premium Ltd. v. Hoi, No. 2:23-cv-00349 (C.D. Cal. Nov. 6, 2023), 2023 WL 8895698.
- <sup>267</sup> Compl., MG Premium Ltd. v. Hoi, No. 2:23-cv-00349 (C.D. Cal. Jan. 18, 2023), 2023 WL 8895698.
- <sup>268</sup> Lisa Thompson, et al., *Identifying Image-based Sexual Abuse: Classifications and Definitions*, (Washington, DC: National Center on Sexual Exploitation, August 2024), [https://www.researchgate.net/publication/384396457\\_Identifying\\_Image-Based\\_Sexual\\_Abuse\\_Classifications\\_and\\_Definitions](https://www.researchgate.net/publication/384396457_Identifying_Image-Based_Sexual_Abuse_Classifications_and_Definitions).
- <sup>269</sup> Home Security Heroes, "2023 State of Deepfakes: Realities, Threats, and Impact," accessed March 5, 2023, <https://www.homesecurityheroes.com/state-of-deepfakes/#overview-of-current-state>.
- <sup>270</sup> Blake Montgomery, "Taylor Swift AI Images Prompt US Bill to Tackle Nonconsensual, Sexual Deepfakes," *The Guardian*, January 30, 2024, <https://www.theguardian.com/technology/2024/jan/30/taylor-swift-ai-deepfake-nonconsensual-sexual-images-bill>.
- <sup>271</sup> Kat Tenbarge, "Found through Google, bought with Visa and Mastercard: Inside the Deepfake Porn Economy," *NBCNews.com*, March 27, 2023, <https://www.nbcnews.com/tech/internet/deepfake-porn-ai-mr-deep-fake-economy-google-visa-mastercard-download-rcna75071>.
- <sup>272</sup> Julie Jargon, "Fake Nudes of Real Students Cause an Uproar at a New Jersey High School," *The Wall Street Journal*, November 2, 2023, [https://www.wsj.com/tech/fake-nudes-of-real-students-cause-an-uproar-at-a-new-jersey-high-school-df10f1bb?mod=tech\\_lead\\_story](https://www.wsj.com/tech/fake-nudes-of-real-students-cause-an-uproar-at-a-new-jersey-high-school-df10f1bb?mod=tech_lead_story); Kat Tenbarge, "Beverly Hills Middle School Expels 5 Students after Deepfake Nude Photos Incident," *NBC News*, March 8, 2024, <https://www.nbcnews.com/tech/tech-news/beverly-hills-school-expels-students-deepfake-nude-photos-rcna142480>; Michael Safi, Alex Attack, and Joshua Kelly, "Revealed: the Names Linked to ClothOff, the Deepfake Pornography App," *The Guardian*, February 29, 2024, <https://amp.theguardian.com/technology/2024/feb/29/clothoff-deepfake-ai-pornography-app-names-linked-revealed>.
- <sup>273</sup> Thorn and BSG, *Youth Perspectives on Online Safety, 2023: An Annual Report of Youth Attitudes and Experiences* (Thorn, August 2024), [https://info.thorn.org/hubfs/Research/Thorn\\_23\\_YouthMonitoring\\_Report.pdf](https://info.thorn.org/hubfs/Research/Thorn_23_YouthMonitoring_Report.pdf).
- <sup>274</sup> Cecilia King, "A.I.-Generated Child Sexual Abuse Material May Overwhelm Tip Line," *The New York Times*, April 22, 2024, <https://www.nytimes.com/2024/04/22/technology/ai-csam-cybertipline.html>; Caroline Haskins, "Florida Middle Schoolers Arrested for Allegedly Creating Deepfake Nudes of Classmates," *Wired*, March 8, 2024, <https://www.wired.com/story/florida-teens-arrested-deepfake-nudes-classmates>; Federal Bureau of Investigations, "'Horribly Twisted' Charlotte Pornography Case Shows the 'Unsettling' Reach of AI-generated Imagery," *FBI News*, April 29, 2024, <https://www.fbi.gov/news/stories/charlotte-child-sexual-abuse-material-case-shows-unsettling-reach-of-ai-generated-imagery>; U.S. Department of Justice Archives, "Man Arrested for Producing, Distributing, and Possessing AI-Generated Images of Minors Engaged in Sexually Explicit Conduct," news release, May 20, 2024, <https://www.justice.gov/archives/opa/pr/man-arrested-producing-distributing-and-possessing-ai-generated-images-minors-engaged>; U.S. Department of Justice Archives, "Army Soldier Arrested for Using AI to Generate Child Pornography," news release, August 26, 2024, <https://www.justice.gov/archives/opa/pr/army-soldier-arrested-using-ai-generate-child-pornography>.
- <sup>275</sup> Matt Burgess, "Deepfake Porn is Out of Control," *Wired*, October 16, 2023, <https://www.wired.com/story/deepfake-porn-is-out-of-control>.
- <sup>276</sup> Matt Burgess, "Deepfake Porn is Out of Control," *Wired*, October 16, 2023, <https://www.wired.com/story/deepfake-porn-is-out-of-control>.
- <sup>277</sup> Home Security Heroes, "2023 State of Deepfakes: Realities, Threats, and Impact," accessed March 5, 2023, <https://www.homesecurityheroes.com/state-of-deepfakes/#overview-of-current-state>.
- <sup>278</sup> Home Security Heroes, "2023 State of Deepfakes: Realities, Threats, and Impact," accessed March 5, 2023, <https://www.homesecurityheroes.com/state-of-deepfakes/#overview-of-current-state>.
- <sup>279</sup> Home Security Heroes, "2023 State of Deepfakes: Realities, Threats, and Impact," accessed March 5, 2023, <https://www.homesecurityheroes.com/state-of-deepfakes/#overview-of-current-state>.
- <sup>280</sup> Home Security Heroes, "2023 State of Deepfakes: Realities, Threats, and Impact," accessed March 5, 2023, <https://www.homesecurityheroes.com/state-of-deepfakes/#overview-of-current-state>.
- <sup>281</sup> Lisa Thompson, et al., *Identifying Image-based Sexual Abuse: Classifications and Definitions*, (Washington, DC: National Center on Sexual Exploitation, August 2024), [https://www.researchgate.net/publication/384396457\\_Identifying\\_Image-Based\\_Sexual\\_Abuse\\_Classifications\\_and\\_Definitions](https://www.researchgate.net/publication/384396457_Identifying_Image-Based_Sexual_Abuse_Classifications_and_Definitions).
- <sup>282</sup> Lisa Thompson, et al., *Identifying Image-based Sexual Abuse: Classifications and Definitions*, (Washington, DC: National Center on Sexual Exploitation, August 2024), [https://www.researchgate.net/publication/384396457\\_Identifying\\_Image-Based\\_Sexual\\_Abuse\\_Classifications\\_and\\_Definitions](https://www.researchgate.net/publication/384396457_Identifying_Image-Based_Sexual_Abuse_Classifications_and_Definitions).
- <sup>283</sup> Home Security Heroes, "2023 State of Deepfakes: Realities, Threats, and Impact," accessed March 5, 2023, <https://www.homesecurityheroes.com/state-of-deepfakes/#overview-of-current-state>.
- <sup>284</sup> Home Security Heroes, "2023 State of Deepfakes: Realities, Threats, and Impact," accessed March 5, 2023, <https://www.homesecurityheroes.com/state-of-deepfakes/#overview-of-current-state>.
- <sup>285</sup> E. Rosalie Li, Benjamin Shultz, and Nina Jankowicz, *Deepfake Pornography Goes to Washington: Measuring the Prevalence of AI-Generated Non-Consensual Intimate Imagery Targeting Congress*, (Washington, DC: American Sunlight Project, December 11, 2024), <https://static1.squarespace.com/static/6612cbdfd9a9ce56ef931004/t/67586997eae5c6ae3bb5e24/1733847451191/ASP+DFP+Report.pdf>.
- <sup>286</sup> E. Rosalie Li, Benjamin Shultz, and Nina Jankowicz, *Deepfake Pornography Goes to Washington: Measuring the Prevalence of AI-Generated Non-Consensual Intimate Imagery Targeting Congress*, (Washington, DC: American Sunlight Project, December 11, 2024), <https://static1.squarespace.com/static/6612cbdfd9a9ce56ef931004/t/67586997eae5c6ae3bb5e24/1733847451191/ASP+DFP+Report.pdf>.
- <sup>287</sup> E. Rosalie Li, Benjamin Shultz, and Nina Jankowicz, *Deepfake Pornography Goes to Washington: Measuring the Prevalence of AI-Generated Non-Consensual Intimate Imagery Targeting Congress*, (Washington, DC: American Sunlight Project, December 11, 2024), <https://static1.squarespace.com/static/6612cbdfd9a9ce56ef931004/t/67586997eae5c6ae3bb5e24/1733847451191/ASP+DFP+Report.pdf>.
- <sup>288</sup> Home Security Heroes, "2023 State of Deepfakes: Realities, Threats, and Impact," accessed March 5, 2023, <https://www.homesecurityheroes.com/state-of-deepfakes/#overview-of-current-state>.
- <sup>289</sup> Charlie Warzel, "Pornhub Banned Deepfake Celebrity Sex Videos, but the Site is Still Full of Them," *BuzzFeedNews.com*, April 18, 2018, <https://www.buzzfeednews.com/article/charliwarzel/pornhub-banned-deepfake-celebrity-sex-videos-but-the-site>.



## Part X: Endnotes (Continued)

- <sup>290</sup> Charlie Warzel, "Pornhub Banned Deepfake Celebrity Sex Videos, but the Site is Still Full of Them," *BuzzFeedNews.com*, April 18, 2018, <https://www.buzzfeednews.com/article/charliwarzel/pornhub-banned-deepfake-celebrity-sex-videos-but-the-site>.
- <sup>291</sup> Charlie Warzel, "Pornhub Banned Deepfake Celebrity Sex Videos, but the Site is Still Full of Them," *BuzzFeedNews.com*, April 18, 2018, <https://www.buzzfeednews.com/article/charliwarzel/pornhub-banned-deepfake-celebrity-sex-videos-but-the-site>.
- <sup>292</sup> Sophie Maddocks, "'A Deepfake Porn Plot Intended to Silence Me': Exploring Continuities between Pornographic and 'Political' Deep Fakes," *Porn Studies* 7, no. 4 (2020): <https://doi.org/10.1080/23268743.2020.1757499>.
- <sup>293</sup> Victoria Rousay, "Sexual Deepfakes and Image-based Sexual Abuse: Victim-Survivor Experiences and Embodied Harms," (Master's thesis, Harvard University Division of Continuing Education, 2023), <https://dash.harvard.edu/handle/1/37374909>.
- <sup>294</sup> Victoria Rousay, "Sexual Deepfakes and Image-based Sexual Abuse: Victim-Survivor Experiences and Embodied Harms," (Master's thesis, Harvard University Division of Continuing Education, 2023), <https://dash.harvard.edu/handle/1/37374909>.
- <sup>295</sup> Alyssa Mercante, "Popular Female Twitch Streamers Targeted in Deepfake Pornography Scandal," *Kotaka.com*, January 31, 2023, <https://kotaku.com/deepfake-atrion-twitch-streamer-apology-legal-action-1850055762>.
- <sup>296</sup> Alyssa Mercante, "Popular Female Twitch Streamers Targeted in Deepfake Pornography Scandal," *Kotaka.com*, January 31, 2023, <https://kotaku.com/deepfake-atrion-twitch-streamer-apology-legal-action-1850055762>.
- <sup>297</sup> Victoria Rousay, "Sexual Deepfakes and Image-based Sexual Abuse: Victim-Survivor Experiences and Embodied Harms," (Master's thesis, Harvard University Division of Continuing Education, 2023), <https://dash.harvard.edu/handle/1/37374909>.
- <sup>298</sup> Victoria Rousay, "Pornhub's Deepfake Deception: Yet Another Way the Porn Giant Profits from Abuse," *National Center on Sexual Exploitation*, August 18, 2023, <https://endsexualexploitation.org/articles/pornhubs-deepfake-deception-yet-another-way-the-porn-giant-profits-from-abuse>.
- <sup>299</sup> Samantha Cole, Emmanuel Mailberg, and Anna Koslerova, "'Frankenstein's Monster': Images of Sexual Abuse Are Fueling Algorithmic Porn" *Vice*, November 10, 2020, <https://www.vice.com/en/article/akdgnp/sexual-abuse-fueling-ai-porn-deepfake-czech-casting-girls-do-porn>.
- <sup>300</sup> Samantha Cole, Emmanuel Mailberg, and Anna Koslerova, "'Frankenstein's Monster': Images of Sexual Abuse Are Fueling Algorithmic Porn" *Vice*, November 10, 2020, <https://www.vice.com/en/article/akdgnp/sexual-abuse-fueling-ai-porn-deepfake-czech-casting-girls-do-porn>.
- <sup>301</sup> Samantha Cole, Emmanuel Mailberg, and Anna Koslerova, "'Frankenstein's Monster': Images of Sexual Abuse Are Fueling Algorithmic Porn" *Vice*, November 10, 2020, <https://www.vice.com/en/article/akdgnp/sexual-abuse-fueling-ai-porn-deepfake-czech-casting-girls-do-porn>.
- <sup>302</sup> Samantha Cole, Emmanuel Mailberg, and Anna Koslerova, "'Frankenstein's Monster': Images of Sexual Abuse Are Fueling Algorithmic Porn" *Vice*, November 10, 2020, <https://www.vice.com/en/article/akdgnp/sexual-abuse-fueling-ai-porn-deepfake-czech-casting-girls-do-porn>.
- <sup>303</sup> Samantha Cole, Emmanuel Mailberg, and Anna Koslerova, "'Frankenstein's Monster': Images of Sexual Abuse Are Fueling Algorithmic Porn" *Vice*, November 10, 2020, <https://www.vice.com/en/article/akdgnp/sexual-abuse-fueling-ai-porn-deepfake-czech-casting-girls-do-porn>.
- <sup>304</sup> Samantha Cole, Emmanuel Mailberg, and Anna Koslerova, "'Frankenstein's Monster': Images of Sexual Abuse Are Fueling Algorithmic Porn" *Vice*, November 10, 2020, <https://www.vice.com/en/article/akdgnp/sexual-abuse-fueling-ai-porn-deepfake-czech-casting-girls-do-porn>.
- <sup>305</sup> Abeba Birhane, Vinay Uday Prabhu, and Emmanuel Kahembwe, "Multimodal Datasets: Misogyny, Pornography, and Malignant Stereotypes," *arXiv abs/2110.01963* (2021): see abstract, <https://arxiv.labs.arxiv.org/html/2110.01963>.
- <sup>306</sup> Lisa Thompson, *The High Stakes of AI Ethics: Evaluating OpenAI's Potential Shift to "NSFW" Content and Other Concerns* (Washington, DC: National Center on Sexual Exploitation, August 23, 2024), [https://www.researchgate.net/publication/384112603\\_The\\_High\\_Stakes\\_of\\_AI\\_Ethics\\_Evaluating\\_OpenAI's\\_Potential\\_Shift\\_to\\_NSFW\\_Content\\_and\\_Other\\_Concerns](https://www.researchgate.net/publication/384112603_The_High_Stakes_of_AI_Ethics_Evaluating_OpenAI's_Potential_Shift_to_NSFW_Content_and_Other_Concerns).
- <sup>307</sup> Clare McGlynn, Kelly Johnson, Erika Rackley, Nicola Henry, Nicola Gavey, Asher Flynn, and Anastasia Powell, "'It's Torture for the Soul': The Harms of Image-based Sexual Abuse," *Social & Legal Studies* 30, no. 4 (2021): 541-562, <https://doi.org/10.1177/0964663920947791>.
- <sup>308</sup> Noelle Martin, "Image-based Sexual Abuse and Deepfakes: A Survivor Turned Activist's Perspective," in *The Palgrave Handbook on Gendered Violence and Technology*, eds. Anastasia Powell, Asher Flynn, and Lisa Sugiura (Cham, Switzerland: Palgrave Macmillan imprint of Springer Nature Switzerland, 2021), 59.
- <sup>309</sup> Sebastian Meineck and Chris Köver, "World's Largest Porn Site: How XVideos Does Very Little against Sexualized Violence," *Netropolitik.org*, March 11, 2022, <https://netropolitik.org/2022/how-xvideos-does-very-little-against-sexualized-violence>.
- <sup>310</sup> Sebastian Meineck and Chris Köver, "World's Largest Porn Site: How XVideos Does Very Little against Sexualized Violence," *Netropolitik.org*, March 11, 2022, <https://netropolitik.org/2022/how-xvideos-does-very-little-against-sexualized-violence>.
- <sup>311</sup> Lindsey Lane, et al., 2022 *Federal Human Trafficking Report* (Human Trafficking Institute, 2023), [https://traffickinginstitute.org/wp-content/uploads/2023/06/2022-Federal-Human-Trafficking-Report-WEB-Spreads\\_compressed.pdf](https://traffickinginstitute.org/wp-content/uploads/2023/06/2022-Federal-Human-Trafficking-Report-WEB-Spreads_compressed.pdf); Lindsey Lane, et al., 2021 *Federal Human Trafficking Report* (Human Trafficking Institute, 2022), <https://traffickinginstitute.org/wp-content/uploads/2022/06/2021-Federal-Human-Trafficking-Report-Web.pdf>; Thorn and Vanessa Bouché, *Survivor Insights. The Role of Technology in Domestic Minor Sex Trafficking* (Thorn, January 2018), [https://www.thorn.org/wp-content/uploads/2019/12/Thorn\\_Survivor\\_Insights\\_090519.pdf](https://www.thorn.org/wp-content/uploads/2019/12/Thorn_Survivor_Insights_090519.pdf); Laura J. Lederer and Christopher A. Wetzel, "The Health Consequences of Sex Trafficking and Their Implications for Identifying Victims in Healthcare Facilities," *Annals of Health Law* 23, no. 1 (2014), <https://lawcommons.luc.edu/annals/vol23/iss1/5>; Robert W. Peters, Laura J. Lederer, and Shane Kelly, "The Slave and the Porn Star: Sexual Trafficking and Pornography," *The Protection Project Journal of Human Rights and Civil Society* 5 (2012), <https://www.scribd.com/doc/304456321/slave-and-the-porn-star-pdf>; Kimberly Kotrla and Beth Ann Wommack, "Sex Trafficking of Minors in the U.S.: Implications for Policy, Prevention and Research," *Journal of Applied Research on Children: Informing Policy for Children at Risk*, 2, no. 1 (2011), <https://digitalcommons.library.tmc.edu/childrenatrisk/vol2/iss1/5/>; Donna M. Hughes, *The Demand for Victims of Sex Trafficking*, (Washington, DC: Office to Monitor and Combat Trafficking in Persons, US Department of States, 2005), [https://www.academia.edu/3415676/The\\_Demand\\_for\\_Victims\\_of\\_Sex\\_Trafficking](https://www.academia.edu/3415676/The_Demand_for_Victims_of_Sex_Trafficking); Melissa Farley, et al., "Prostitution and Trafficking in Nine Countries: An Update on Violence and Posttraumatic Stress Disorder," in *Prostitution, Trafficking, and Traumatic Stress*, ed. Melissa Farley (Binghamton, NY: The Haworth Maltreatment Press, 2003).

**Part X: Endnotes (Continued)**

- <sup>312</sup> United States Attorney's Office, Southern District of Florida, "Two Men Sentenced to Multiple Life Sentences for Enticing Women to South Florida to Engage in Commercial Sex Acts and Distributing Date Rape Pills," news release, February 17, 2012, <https://www.justice.gov/archive/usao/fls/PressReleases/2012/120217-03.html>.
- <sup>313</sup> United States Attorney's Office, Southern District of Florida, "Two Men Sentenced to Multiple Life Sentences for Enticing Women to South Florida to Engage in Commercial Sex Acts and Distributing Date Rape Pills," news release, February 17, 2012, <https://www.justice.gov/archive/usao/fls/PressReleases/2012/120217-03.html>.
- <sup>314</sup> United States Attorney's Office, Southern District of Florida, "Two Men Sentenced to Multiple Life Sentences for Enticing Women to South Florida to Engage in Commercial Sex Acts and Distributing Date Rape Pills," news release, February 17, 2012, <https://www.justice.gov/archive/usao/fls/PressReleases/2012/120217-03.html>.
- <sup>315</sup> United States Attorney's Office, Southern District of Florida, "Two Men Sentenced to Multiple Life Sentences for Enticing Women to South Florida to Engage in Commercial Sex Acts and Distributing Date Rape Pills," news release, February 17, 2012, <https://www.justice.gov/archive/usao/fls/PressReleases/2012/120217-03.html>.
- <sup>316</sup> United States Attorney's Office, Southern District of Florida, "Two Men Sentenced to Multiple Life Sentences for Enticing Women to South Florida to Engage in Commercial Sex Acts and Distributing Date Rape Pills," news release, February 17, 2012, <https://www.justice.gov/archive/usao/fls/PressReleases/2012/120217-03.html>.
- <sup>317</sup> Ashlee Gore and Leisha Du Preez, "'GirlsDoPorn': Online Pornography and Politics of Responsibility for Technology Facilitated Sexual Exploitation" in *The Palgrave Handbook of Gendered Violence and Technology*, ed. Anastasia Powell, Asher Flynn, and Lisa Sugiura (Cham, Switzerland: Palgrave MacMillan, 2021), <https://link.springer.com/book/10.1007/978-3-030-83734-1>.
- <sup>318</sup> John Annese, "Pornhub to Pay More than \$1.8M to Resolve GirlsDoPorn Sex Trafficking Probe: Feds," *Daily News*, December 21, 2023, <https://www.nydailynews.com/2023/12/21/pornhub-to-pay-more-than-1-8m-to-resolve-girlsdoporn-sex-trafficking-probe-feds>; U.S. v. Aylo Holdings S.À.R.L., No. 23-CR-463, E.D.N.Y. (2023), [https://www.justice.gov/d9/2023-12/2023.12.21\\_information\\_final\\_0.pdf](https://www.justice.gov/d9/2023-12/2023.12.21_information_final_0.pdf) (accessed March 6, 2024).
- <sup>319</sup> Ashlee Gore and Leisha Du Preez, "'GirlsDoPorn': Online Pornography and Politics of Responsibility for Technology Facilitated Sexual Exploitation" in *The Palgrave Handbook of Gendered Violence and Technology*, ed. Anastasia Powell, Asher Flynn, and Lisa Sugiura (Cham, Switzerland: Palgrave MacMillan, 2021), <https://link.springer.com/book/10.1007/978-3-030-83734-1>.
- <sup>320</sup> Ashlee Gore and Leisha Du Preez, "'GirlsDoPorn': Online Pornography and Politics of Responsibility for Technology Facilitated Sexual Exploitation" in *The Palgrave Handbook of Gendered Violence and Technology*, ed. Anastasia Powell, Asher Flynn, and Lisa Sugiura (Cham, Switzerland: Palgrave MacMillan, 2021), p. 655, <https://link.springer.com/book/10.1007/978-3-030-83734-1>.
- <sup>321</sup> John Annese, "Pornhub to Pay More than \$1.8M to Resolve GirlsDoPorn Sex Trafficking Probe: Feds," *Daily News*, December 21, 2023, <https://www.nydailynews.com/2023/12/21/pornhub-to-pay-more-than-1-8m-to-resolve-girlsdoporn-sex-trafficking-probe-feds>.
- <sup>322</sup> John Annese, "Pornhub to Pay More than \$1.8M to Resolve GirlsDoPorn Sex Trafficking Probe: Feds," *Daily News*, December 21, 2023, <https://www.nydailynews.com/2023/12/21/pornhub-to-pay-more-than-1-8m-to-resolve-girlsdoporn-sex-trafficking-probe-feds>.
- <sup>323</sup> First Amended Complaint at 32-34, Doe #1 v. MG Freesites, LTD, No. 7:21-CV-00220-LSC (Jul 23, 2021).
- <sup>324</sup> Nicholas Kristof, "Why Do We Let Corporations Profit from Rape Videos?" *New York Times*, April 16, 2021, <https://www.nytimes.com/2021/04/16/opinion/sunday/companies-online-rape-videos.html>.
- <sup>325</sup> *Prague Morning*, "Czech Casting: Women Lured by Modeling Gigs, Manipulated into Shooting Porn," *Prague Morning*, December 5, 2023, <https://praguemorning.cz/czech-casting-women-lured-by-modeling-gigs-manipulated-into-porn>.
- <sup>326</sup> Samantha Cole, Emanuel Maiberg, and Anna Koslerova, "'Frankenstein's Monster': Images of Sexual Abuse are Fueling Algorithmic Porn" *Vice*, November 10, 2020, <https://www.vice.com/en/article/akdgnp/sexual-abuse-fueling-ai-porn-deepfake-czech-casting-girls-do-porn>.
- <sup>327</sup> Samantha Cole, Emanuel Maiberg, and Anna Koslerova, "'Frankenstein's Monster': Images of Sexual Abuse are Fueling Algorithmic Porn" *Vice*, November 10, 2020, <https://www.vice.com/en/article/akdgnp/sexual-abuse-fueling-ai-porn-deepfake-czech-casting-girls-do-porn>.
- <sup>328</sup> *Prague Morning*, "Czech Casting: Women Lured by Modeling Gigs, Manipulated into Shooting Porn," *Prague Morning*, December 5, 2023, <https://praguemorning.cz/czech-casting-women-lured-by-modeling-gigs-manipulated-into-porn>.
- <sup>329</sup> First Amended Complaint, Doe #1 v. MG Freesites, LTD, No. 7:21-CV-00220-LSC (Jul 23, 2021).
- <sup>330</sup> Georgia M. Winters, et al., "The Sexual Grooming Model of Child Sex Trafficking," *Victims & Offenders* 17, no. 1 (2022): 60–77, <https://doi.org/10.1080/15564886.2021.1926031>; Joan A. Reid, "Entrapment and Enmeshment Schemes Used by Sex Traffickers," *Sexual Abuse: A Journal of Research and Treatment* 28, no. 6 (2016): 491–511, <https://doi.org/10.1177/1079063214544334>; Helen Brayley, Eleanor Cockbain, and Gloria Laycock, "The Value of Crime Scripting: Deconstructing Internal Child Sex Trafficking," *Policing* 5, no. 2 (2011): 132–143, <https://doi.org/10.1093/police/par024>; Melissa Farley, Kenneth Franzblau, and M. Alexis Kennedy, "Online Prostitution and Trafficking," *Albany Law Review* 77 (2014): 1039–1094, <https://www.albanylawreview.org/article/70164-online-prostitution-and-trafficking>; T.S. "Session II," *In Harm's Way: The Pornography Civil Rights Hearings*, eds. Catherine A. MacKinnon and Andrea Dworkin, (Cambridge, MA: Harvard University Press, 1997); Mimi H. Silbert and Ayala M. Pines, "Pornography and Sexual Abuse of Women," *Sex Roles* 10, no. 11/12 (1984): 857–868.

- <sup>331</sup> The Counter Trafficking Data Collaborative, "Global Data Hub on Human Trafficking, Men and Boys Trafficked into Sexual Exploitation," International Organization for Migration, 2023 <https://www.ctdatacollaborative.org/story/men-and-boys-trafficked-sexual-exploitation> (accessed December 7, 2023); United States Attorney's Office, Southern District of California, "Twenty-Year Sentence in GirlsDoPorn Sex Trafficking Conspiracy," news release, June 14, 2021, <https://www.justice.gov/usao-sdca/pr/twenty-year-sentence-girlsdoporn-sex-trafficking-conspiracy>; Lindsey Lane, et al., 2022 *Federal Human Trafficking Report* (Human Trafficking Institute, 2023), [https://traffickinginstitute.org/wp-content/uploads/2023/06/2022-Federal-Human-Trafficking-Report-WEB-Spreads\\_compressed.pdf](https://traffickinginstitute.org/wp-content/uploads/2023/06/2022-Federal-Human-Trafficking-Report-WEB-Spreads_compressed.pdf); Lindsey Lane, et al., 2021 *Federal Human Trafficking Report* (Human Trafficking Institute, 2022), <https://traffickinginstitute.org/wp-content/uploads/2022/06/2021-Federal-Human-Trafficking-Report-Web.pdf>; OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, *Leveraging Innovation to Fight Trafficking in Human Beings: A Comprehensive Analysis of Technology Tools* (Vienna, Austria: OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings and Tech Against Trafficking, 2020), [https://www.osce.org/files/f/documents/9/6/455206\\_1.pdf](https://www.osce.org/files/f/documents/9/6/455206_1.pdf); United Nations Office on Drugs and Crime, *Global Report on Trafficking in Persons 2020* (United Nations publication, Sales No. E.20.IV.3, 2020), [https://www.unodc.org/documents/data-and-analysis/tip/2021/GLOTiP\\_2020\\_15jan\\_web.pdf](https://www.unodc.org/documents/data-and-analysis/tip/2021/GLOTiP_2020_15jan_web.pdf); Tonya Alanez, "58 Porno Videos of 15-year-old Girl Lead to Davie Man's Arrest," *South Florida Sun Sentinel*, October 23, 2019, <https://www.sun-sentinel.com/2019/10/23/58-porno-videos-of-15-year-old-girl-lead-to-davie-mans-arrest>; Robert W. Peters, Laura J. Lederer, and Shane Kelly, "The Slave and the Porn Star: Sexual Trafficking and Pornography," *The Protection Project Journal of Human Rights and Civil Society* 5 (2012), <https://www.scribd.com/doc/304456321/slave-and-the-porn-star-pdf>; Kimberly Kotrla and Beth Ann Wommack, "Sex Trafficking of Minors in the U.S.: Implications for Policy, Prevention and Research," *Journal of Applied Research on Children: Informing Policy for Children at Risk* 2, no. 1 (2011), <https://digitalcommons.library.tmc.edu/childrenatrisk/vol2/iss1/5>; UNODC, *Evidential Issues in Trafficking in Persons Cases. CASE DIGEST*. (Vienna, Austria: United Nations on Drugs and Crime, 2017), [https://www.unodc.org/documents/human-trafficking/2017/Case\\_Digest\\_Evidential\\_Issues\\_in\\_Trafficking.pdf](https://www.unodc.org/documents/human-trafficking/2017/Case_Digest_Evidential_Issues_in_Trafficking.pdf); Thorn and Vanessa Bouché, *Survivor Insights. The Role of Technology in Domestic Minor Sex Trafficking* (Thorn, 2018), [https://www.thorn.org/wp-content/uploads/2019/12/Thorn\\_Survivor\\_Insights\\_090519.pdf](https://www.thorn.org/wp-content/uploads/2019/12/Thorn_Survivor_Insights_090519.pdf); Laura J. Lederer and Christopher A. Wetzel, "The Health Consequences of Sex Trafficking and Their Implications for Identifying Victims in Healthcare Facilities," *Annals of Health Law* 23, no. 1 (2014), <https://lawcommons.luc.edu/annals/vol23/iss1/5>; Martha Mendoza and Jim Gomez, "AP Exclusive: Big Child Webcam Sex Bust Reveals Rising Abuse," *APNews.com*, May 9, 2017, <https://apnews.com/article/business-only-on-ap-74b81f79e9024124a1cfe43a0ce9eec2>; Donna M. Hughes, "Sex Trafficking of Women for the Production of Pornography," *Citizen against Trafficking*, July 1, 2010; Donna M. Hughes, *The Demand for Victims of Sex Trafficking*, (Washington, DC: Office to Monitor and Combat Trafficking in Persons, US Department of States, 2005), [https://www.academia.edu/3415676/The\\_Demand\\_for\\_Victims\\_of\\_Sex\\_Trafficking](https://www.academia.edu/3415676/The_Demand_for_Victims_of_Sex_Trafficking); Melissa Farley, et al., "Prostitution and Trafficking in Nine Countries: An Update on Violence and Posttraumatic Stress Disorder," in *Prostitution, Trafficking, and Traumatic Stress*, ed. Melissa Farley (Binghamton, NY: The Haworth Maltreatment Press, 2003).
- <sup>332</sup> *United States v. Salaam*, No. 21-3566, 2024 WL 3163256 (6th Cir. June 25, 2024); Melissa Farley, Kenneth Franzblau, and M. Alexis Kennedy, "Online Prostitution and Trafficking," *Albany Law Review* 77 (2014): 1039–1094, <https://www.albanylawreview.org/article/70164-online-prostitution-and-trafficking>; Erik L. Bauer, "Legal Aspects of Human Trafficking," (2020), on file with author; Patti B. Saris, et al., *Report to the Congress: Federal Child Pornography Offenses* (Washington, DC: United States Sentencing Commission, 2012), <https://www.uscc.gov/research/congressional-reports/2012-report-congress-federal-child-pornography-offenses>; M.A. ex rel P.K. v. *Village Voice Media Holdings, LLC*, 809 F. Supp. 2d 1041 (E.D. Mo. 2011), <https://casetext.com/case/ma-v-village-voice-media-holdings> (accessed November 8, 2023); Ken Franzblau, "Slavefarm, Sex Tours and the Pimp John T.: Using Pornography to Advance Trafficking, Sex Tourism, and Prostitution," in *Pornography: Driving the Demand in International Sex Trafficking*, ed. David E. Guinn and Julie DiCaro (USA: International Human Rights Law Institute, DePaul University College of Law, and Captive Daughters Media, 2007), 261–273.
- <sup>333</sup> Charlotte Deogan, Elin Jacobsson, Louise Mannheimer, "Are Men Who Buy Sex Different from Men Who Do Not?: Exploring Sex Life Characteristics Based on a Randomized Population Survey in Sweden," *Archives of Sexual Behavior* 50 (2020): 2049–2055, <https://link.springer.com/article/10.1007/s10508-020-01843-3>.
- <sup>334</sup> Paul J. Wright, "Pornography Consumption and Condomless Sex among Emerging U.S. Adults: Results from Six Nationally Representative Surveys," *Health Communication* 37, no. 14 (2022): 1740–1747, <https://doi.org/10.1080/10410236.2021.1917745>; Paul J. Wright and Ashley K. Randall, "Internet Pornography Exposure and Risky Sexual Behavior among Adult Males in the United States," *Computers in Human Behavior* 28 (2012): 1410–1416, <http://dx.doi.org/10.1016/j.chb.2012.03.003>; Demand Abolition, *Who Buys Sex? Understanding and Disrupting Illicit Market Demand* (Boston, MA: Demand Abolition, 2018), <https://www.demandabolition.org/who-buys-sex>; Gisela Priebe and Carl Göran Svedin, *Selling and Buying Sex in Sweden 2011: Occurrence, Health, and Attitudes; Interim Report 1 Hour Prostitution in Sweden – Mapping and Evaluation of the Prostitution Groups Efforts as Well as Experiences and Attitudes in the Population* (Sweden: Linköping University Electronic Press, 2012), <https://liu.diva-portal.org/smash/record.jsf?pid=diva2%3A505995&dswid=2183>; Melissa Farley, Wendy Freed, Kien Serey Phal, and Jacqueline Golding, "A Thorn in the Heart: Cambodian Men Who Buy Sex," Paper presented at Focus on Men who Buy Sex: Discourage Men's Demand for Prostitution, Stop Sex Trafficking co-hosted by Cambodian Women's Crisis Center and Prostitution Research & Education, July 17, 2012, Phnom Penh, Cambodia, <https://www.prostitutionresearch.com/A%20thorn%20in%20the%20heart%20-%20executive%20summer.pdf>; Melissa Farley et al., "Comparing Sex Buyers with Men Who Don't Buy Sex: 'You Can Have a Good Time with the Servitude' vs. 'You're Supporting a System of Degradation,'" Paper presented at Psychologists for Social Responsibility Annual Meeting July 15, 2011, Boston, MA, (San Francisco, CA: Prostitution Research & Education, 2011); Melissa Farley, et al., "Attitudes and Social Characteristics of Men Who Buy Sex in Scotland," *Psychological Trauma: Theory, Research, Practice, and Policy* 3, no. 4 (2011): 369–383, <https://psycnet.apa.org/record/2011-06105-001>; Steven Stack, Ira Wasserman, and Roger Kern, "Adult Social Bonds and Use of Internet Pornography," *Social Science Quarterly* 85 (2004): 75–88, <https://doi.org/10.1111/j.0038-4941.0038-4941.2004.08501006.x>; Martin A. Monto and Nick McRee, "A Comparison of the Male Customers of Female Street Prostitutes With National Samples of Men," *International Journal of Offender Therapy and Comparative Criminology* 49, no. 5 (2005): 505–529; Martin A. Monto, "Final Report for National Institute of Justice Grant #97-IJ-CX-0033 'Focusing on the Clients of Street Prostitutes: A Creative Approach to Reducing Violence Against Women'" (October 30, 1999); Rachel Durchslag and Samir Goswami, *Deconstructing the Demand for Prostitution: Preliminary Insights from Interview with Chicago Men Who Purchase Sex* (Chicago, IL: Chicago Alliance Against Sexual Exploitation, 2008), <https://www.caase.org/wp-content/uploads/2020/06/DeconstructingtheDemandForProstitution.pdf>; Patrick J. Carnes, "The Anatomy of Arousal: Three Internet Portals," *Sexual and Relationship Therapy* 18, no. 3 (2003): 309–328, <http://dx.doi.org/10.1080/14681990310153937>.



**Part X: Endnotes (Continued)**

<sup>335</sup> Rachel Durchslag and Samir Goswami, *Deconstructing the Demand for Prostitution: Preliminary Insights from Interviews with Chicago Men Who Purchase Sex* (Chicago, IL: Chicago Alliance Against Sexual Exploitation, 2008), <https://www.caase.org/wp-content/uploads/2020/06/DeconstructingtheDemandForProstitution.pdf>; Victor Malarek, *The Johns: Sex for Sale and the Men Who Buy It* (New York: NY: Arcade Publishing, Inc., 2009).

<sup>336</sup> Laura J. Lederer and Christopher A. Wetzel, "The Health Consequences of Sex Trafficking and Their Implications for Identifying Victims in Healthcare Facilities," *Annals of Health Law* 23, no. 1 (2014), <https://lawcommons.luc.edu/annals/vol23/iss1/5>; Melissa Farley, Julie Bindel, and Jacqueline M. Golding, *Men Who Buy Sex: Who They Buy and What They Know* (Eaves, London, and Prostitution Research & Education, San Francisco, 2009), <https://documentation.lastradainternational.org/lisidocs/Mensex.pdf>; Robert Peters, *Links between Pornography and Sex Trafficking*, (Free the Captives: Houston Human Trafficking Conference, February 26, 2011; Rachel Durchslag and Samir Goswami, *Deconstructing the Demand for Prostitution: Preliminary Insights from Interview with Chicago Men Who Purchase Sex* (Chicago, IL: Chicago Alliance Against Sexual Exploitation, 2008), <https://www.caase.org/wp-content/uploads/2020/06/DeconstructingtheDemandForProstitution.pdf> (accessed April 21, 2025); Melissa Farley, Wendy Freed, Kien Serey Phal, and Jacqueline Golding, "A Thorn in the Heart: Cambodian Men Who Buy Sex," Paper presented at Focus on Men who Buy Sex: Discourage Men's Demand for Prostitution, Stop Sex Trafficking co-hosted by Cambodian Women's Crisis Center and Prostitution Research & Education, July 17, 2012, Phnom Penh, Cambodia, <https://www.prostitutionresearch.com/A%20thorn%20in%20the%20heart%20-%20executive%20summer.pdf>; Melissa Farley, Emily Schuckman, Jacqueline M. Golding, Kristen Houser, Laura Jarrett, Peter Qualliotine, and Michele Decker, "Comparing Sex Buyers with Men Who Don't Buy Sex: 'You Can Have a Good Time with the Servitude' vs. 'You're Supporting a System of Degradation,'" Paper presented at Psychologists for Social Responsibility Annual Meeting July 15, 2011, Boston, MA, (San Francisco, CA: Prostitution Research & Education, 2011); Melissa Farley, "Renting an Organ for Ten Minutes: What Tricks Tell Us about Prostitution, Pornography, and Trafficking," in *Pornography: Driving the Demand for International Sex Trafficking* (Los Angeles, CA: Captive Daughters, 2007), 144–152; Melissa Farley, et al., "Prostitution and Trafficking in Nine Countries: An Update on Violence and Posttraumatic Stress Disorder," in *Prostitution, Trafficking, and Traumatic Stress*, ed. Melissa Farley (Binghamton, NY: The Haworth Maltreatment & Trauma Press, 2003), 33–74; Melissa Farley and Howard Barkan, "Prostitution, Violence and Posttraumatic Stress Disorder," *Women & Health* 27, no. 3 (1998): 37–49, [https://doi.org/10.1300/J013v27n03\\_03](https://doi.org/10.1300/J013v27n03_03); Mimi H. Silbert and Ayala M. Pines, "Pornography and Sexual Abuse of Women," *Sex Roles* 10, no. 11/12 (1984): 857–868.

---