

**Presentation to the Standing Committee on Access to Information, Privacy and Ethics
by Megan Walker, Executive Director, London Abused Women's Centre (Canada)
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The London Abused Women's Centre (LAWC) provides women and girls over the age of 12 with immediate access to long-term advocacy, support and counselling. During LAWC's last fiscal year, 1,311 prostituted, trafficked and sexually exploited women and girls were provided with immediate access to service.

Ms. Fleites, Ms. Galy, and witnesses one and two courageously testified before the committee about the difficulty they experienced trying to remove their images from Pornhub/MindGeek. Witness two continues to advocate for the removal of her images.

A woman attending service at LAWC wrote about her experience with Pornhub/MindGeek. She wrote, "It was soul destroying to find videos of me on Pornhub. Discovering how readily available they were broke me. Being hit with the reality that anyone could see the darkest points of my life nearly killed me. I had to stop looking for more videos after I found four. I was suicidal and have deep-seeded shame about those videos even though I was a child. It causes a fear I can't put words to."

Quite simply, Pornhub/MindGeek wanted to keep the images up because they drew people to their site. Pornhub/MindGeek dismissed, ignored and/or otherwise made it impossible for images to be removed. This caused and continues to cause women and girls to be retraumatized by going back to the sites over and over again to see if their images have been removed.

Pornhub allowed the uploading of videos of minors being sexually exploited and assaulted, and non-consenting and trafficked women being raped and tortured for the world to see. The videos were available for downloading, leaving a lifelong imprint of trauma on the lives of millions of girls and women.

Last December, Pornhub was forced to remove millions of videos after an investigation showed a large number of them featured underaged girls and non-consenting and trafficked women and girls.

Many were posted on Pornhub's website under the headings of torture porn, fetish porn and teen porn. These headings remain in place.

MindGeek's CEO testified that "every single piece of content is viewed by our human moderators."

This is ridiculous and quite frankly impossible given how many millions of uploads there are. Further, only a team of forensic paediatricians can age these girls.

The goal of MindGeeks' CEO and COO is to make multiple millions of dollars or maybe even billions for lavish lifestyles made possible through their premium, sale of ads and by harvesting and selling data. Their net worth is difficult to determine given the number of shell companies they have. Whether they are worth millions or billions, none of that would be possible without the encouraging the exploitation of children and women on their site(s).

I have reviewed sections 162 and 163 of the criminal code of Canada. I am not a lawyer, however, taken literally it appears clauses in both sections of the criminal code could apply to Pornhub/MindGeek, its affiliated businesses, and its CEO and COO.

In addition to the potential criminal code violations, Pornhub/MindGeek appear to be in violation of international laws on trafficking and child sexual exploitation.

Pornhub/MindGeek allowed for the facilitation of child pornography to the world. They profited from doing so. The testimony from its CEO and COO before this committee potentially implicates them and Pornhub/MindGeek in criminal activities.

LAWC offers the following recommendations:

1. It is recommended that the federal government provide robust funding to organizations across the country working with women and children exploited by Pornhub/MindGeek who are trying to rebuild their lives.
2. Given the testimony from four survivors, who all stated they were sexually exploited as a child, and given the testimony of Pornhub/MindGeek's CEO and COO acknowledging children and non-consenting women have been exploited on Pornhub, it is recommended that the committee send witness statements to police to investigate criminal activities involving children and women.
3. Given the testimony of Pornhub/MindGeek's CEO and COO acknowledging their failure to self-regulate, it is recommended that parliament legislate the end of self-regulation by Pornhub/MindGeek, its affiliated and subsidiary companies, and the pornography industry.
4. It is recommended that a third party not associated with Pornhub/MindGeek, its affiliated and subsidiary companies or the pornography industry be retained to verify age and consent.
5. It is recommended that parliament legislate the prohibition of all credit card companies providing services to Pornhub/MindGeek, its affiliated and subsidiary companies and

the pornography industry until the third party recommended in clause four (above) is established.

6. It is recommended that the Canadian Revenue Agency conduct a forensic audit and criminal investigation on the finances and ownership of MindGeek and its affiliated and subsidiary companies, in order to determine if they are in compliance with relevant Canadian and international tax, disclosure, and other laws and regulations.

It is the role of the government to regulate all industries in order to protect its citizens. When an industry is predatory, especially the porn industry, it is incumbent on the government to regulate the production and consumption related to that industry.

The London Abused Women's Centre encourages the committee to act quickly on the recommendations. In doing so, it can mitigate the number of women and girls who are suicidal and overcome with trauma.



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