



Court File No.

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Electronically issued : 01-Nov-2021
Délivré par voie électronique
Oshawa

CHRISTINE WING

Plaintiff

- and -

**9219-1568 QUEBEC INC., MINDGEEK SARL, MG FREESITES LTD., MG FREESITES
II LTD., MG CONTENT RT LIMITED.**

Defendants

Proceedings under the *Class Proceedings Act, 1992*

STATEMENT OF CLAIM

TO THE DEFENDANT:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Plaintiffs. The Claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a Statement of Defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the Plaintiffs' lawyer or, where the Plaintiffs do not have a lawyer, serve it on the Plaintiffs, and file it, with proof of service, in this Court office, **WITHIN TWENTY DAYS** after this Statement of Claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your Statement of Defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a Statement of Defence, you may serve and file a Notice of Intent to Defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your Statement of Defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT WILL BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

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TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date: November 1, 2021

Issued by: _____

Address of Courthouse:
(Oshawa) Durham Consolidated Courthouse
150 Bond Street East
Oshawa, ON L1G 0A2

TO: **9219-1568 QUEBEC INC.**
7777 Decarie Boulevard, office 300,
Montreal, Quebec, H4P 2H2

AND TO: **MINDGEEK SARL**
Boulevard Royal,
2449 Luxembourg, Luxembourg

AND TO: **MG FREESITES LTD**
195-197 Old Nicosia-Limassol Road
Block 1 Dali Industrial Zone
Cyprus, 2540

AND TO: **MG FREESITES II LTD**
195-197 Old Nicosia-Limassol Road
Block 1 Dali Industrial Zone, Cyprus, 2540

AND TO: **MG CONTENT RT LIMITED**
195-197 Old Nicosia-Limassol Road
Block 1 Dali Industrial Zone, Cyprus, 2540

CLAIM

1. The Plaintiff, Christine Wing, claims on her own behalf and on behalf of the Class:
 - (a) an order pursuant to the *Class Proceedings Act, 1992*, S.O. 1992, c. 6 certifying this proceeding as a class proceeding and appointing the Plaintiff as representative of the Class;
 - (b) damages in the amount of \$500,000,000.00 for the plaintiffs and Class Members who suffered damages as a result of the fault of the Defendants;
 - (c) exemplary, punitive and or aggravated damages in the amount of \$100,000,000.000;
 - (d) Pre-judgment and post-judgment interest pursuant to the Courts of Justice Act, R.S.O. 1990, c. C.43;
 - (e) an order directing a reference, or such other directions as may be necessary to determine issues not determined at the trial of the common issues;
 - (f) costs of this action on a full indemnity basis, inclusive of all disbursements and HST;
 - (g) such further and other relief as counsel may advise and this Court may permit and deem just and appropriate in the circumstances.

THE PARTIES

The Proposed Representative Plaintiffs

2. The Plaintiff Christine Wing (“Christine”) is the Proposed representative of a Class defined as (collectively the “Class” or “Class Members”).
3. Christine is an adult female residing in Ontario. Christine is a victim of sexual exploitation as a result of the Defendants inability to properly screen the sexual content uploaded on a website owned by the Defendants. On or around May 2020, without her knowledge or consent, three separate intimate sexual videos of Christine were released on the website owned by the Defendants by her ex-husband.

The Class

4. The proposed Class Members herein is defined as:
 - (a) Any or all individuals in Canada who appeared in sexual content disseminated by the Defendants, on one or more websites it owns or hosts, directly or indirectly, for streaming and download, who have not consented to the public dissemination of such content;
 - (b) Any or all persons in Canada whose intimate videos or images, (including any sexual abuse material, child sexual abuse, and all other non-consensual intimate content) were posted without their consent on a website owned or operated by the Defendants, directly or indirectly;
 - (c) Any or all persons in Canada whose intimate videos or images were distributed on the Defendants' website without their consent on a website owned or operated by the Defendants, directly or indirectly and such content were misused to their detriment;
 - (d) Any or all persons in Canada whose intimate videos or images continued to be distributed on the Defendants' websites despite their requests for the content's removal;
 - (e) Any or all persons in Canada who featured in the non-consensual content published by the Defendants' websites, and suffered, and continues to suffer damages for which they are entitled to receive compensation.

The Defendants

5. The Defendant, 9219-1568 Quebec Inc. (which carries on business as MindGeek), is a Montreal-based company with between 750 and 999 employees, with a portfolio of pornographic websites.
6. The Defendant MindGeek, SARL., is a legal person having a place of business at 32

Boulevard Royal, 2449 Luxembourg, Luxembourg, which owns, operates and/or manages one or several of the websites.

7. The Defendant, MG Freesites Ltd., is a private limited liability company incorporated under the laws of the Republic of Cyprus having a place of business at 195-197 Old Nicosia-Limassol Road, Block 1 Dali Industrial Zone, Cyprus, Nicosia, 2540. MG Freesites Ltd. owns, operates and/or manages one or several of the websites.
8. The Defendant, MG Freesites II Ltd, is a private limited liability company incorporated under the laws of the Republic of Cyprus having a place of business at 195-197 Old Nicosia-Limassol Road, Block 1 Dali Industrial Zone, Cyprus, Nicosia, 2540. MG Freesites II Ltd. owns, operates and/or manages one or several of the websites.
9. The Defendant, MG Content RT Limited, is a private limited liability company incorporated under the laws of Ireland having a place of business at 195-197 Old Nicosia-Limassol Road, Block 1 Dali Industrial Zone, Cyprus, Nicosia, 2540. MG Content RT Limited owns, operates and/or manages one or several of the websites.
10. The Defendants together will be referred to as "the Defendants".
11. The Defendants have incorporated dozens of subsidiaries and related companies around the world, the details of which are unknown to the Class at this time. However, the Defendants operate as a single business enterprise, merging its funds and other assets to shelter and avoid liabilities and to hide the identity of its owners, and are jointly and severally liable in this action as alter egos of the other.
12. The most popular of the Defendants websites is called PornHub, but it also owns multiple other similar websites, including RedTube, YouPorn, Tube8, PornMD, Thumbzilla, Xtube and others (collectively with PornHub, the "offending websites").
13. These offending websites accept uploading of pornographic photos and videos from the public, including content depicting sexual violence, child sexual abuse, and non-consensual content.
14. As part of its business, the Defendants actively solicits, promotes, and facilitates the

payment for dissemination on its websites of explicit sexual images and videos, from which it generates significant profits.

15. While the offending websites offer premium subscription plans, they offer free content for non-members, and profit from advertising, co-promotions, and other business arrangements.

THE NATURE OF THE ACTION

16. The Defendants are the most dominant online pornography company in the world. The Defendants embrace under-age, non-consensual, and pirated content in its business; solicited, patronized, paid for, and placed illegal content on its platforms.
17. This class proceeding arises out of the Defendants' failure to ensure that only consensual non-violent images and videos would be allowed on websites it owned or operated, directly or indirectly, to make sure all persons involved in such content were of legal consenting age, and to obtain the consent of all persons depicted in the videos.
18. Further, the Defendants had a responsibility to remove any illegal content once they became aware that it was uploaded to their websites.
19. As a result of the Defendants' negligence and/or willful blindness, the Class Members have sustained physical, financial, and substantial psychological harm.

The Non-Consensual Content

20. Despite knowing that illegal content would be uploaded without legitimately monitoring all content uploaded, the Defendants used an upload process that did not filter out any illegal content. Ironically, the users of the Defendants' platforms were able to filter out their preferred content for their enjoyment.
21. The Defendants host content for streaming and download, which depict intimate representations, including sexual acts, which features persons who have never consented

to such publication.

22. The Defendants host content for streaming and download, which features unwilling persons participating in the content who are victims of sex-trafficking, child sexual abuse, and sexual violence.

23. For example:

(a) On June 17, 2021, NBC news posted an article indicating that more than 30 women have accused Pornhub of violating federal trafficking laws, distributing child pornography, racketeering and other crimes". Said article further claims that the Defendants "purchases, launders and uploads illegal content often obtained through human trafficking and sexual assault";

(b) On June 17, 2021, Serena Fleites filed a suit that claims she was victimized by the Defendants when they uploaded and disseminated her intimate videos without her consent; and

(c) According to the website "Fight the New Drug", a woman found videos of herself on the Defendants' site and went to the police. However, the victim was unable to proceed towards a conviction as the police required a statement from the Defendants. Despite multiple requests, the Defendants failed to comply which resulted in the victim's case falling through;

(d) In 2019, the Times (United Kingdom) discovered numerous illegal videos of secretly filmed "creepshots" of underage schoolgirls and "clips of men performing sex acts in front of teenagers". The Times also discovered that the Defendants allowed for the streaming of child sexual abuse which depicted children as young as three years old.

(e) In the New York Post's article dated October 24, 2019, a mother of a missing girl discovered many videos of her daughter being raped and sexually abused on Pornhub;

(f) The Washington Examiner posted an article indicating that Pornhub's "premium content" includes videos documenting the rape and sexual exploitation of minors. Further, the Washington Examiner exposed that a missing 15-year-old girl was found

- by authorities after they tracked down her sex trafficker using the 58 videos he had uploaded to the Defendants website, Pornhub.
- (g) Although the Defendants employ some moderators to make sure videos uploaded every year do not violate any laws, a report published by the New York Times specifies that the site's search does allow for terms like "girl with braces", "r*pe", or "13yo". The New York Times' investigation alleges each of these terms turn up thousand of videos.
- (h) In late 2020, Mastercard launched an investigation into the claims that the Defendants' website was showing videos of child abuse and non-consensual sexual behavior. Mastercard's investigation found that such claims were substantiated. Their investigation resulted in Mastercard blocking their customers from using their companies' credit cards to make purchases on Pornhub. Visa and Discover also suspended the use of its cards for purchases on the Defendants site.
24. The Defendants allowed rapists and sex traffickers to upload sexual abuse content onto their sites.
25. In addition to the above, an open letter dated March 9, 2020, from Canadian Parliament Members and Senators, wrote the Prime Minister, Justin Trudeau the following:

"It has come to our attention that some of this content contains the real exploitation of women and minors. In several cases, Pornhub has either refused to remove such videos, or has failed to remove them in a reasonable time frame...Each time these videos are viewed-and many have hundreds of thousands of views-the victims are revictimized. This is deeply harmful to those exploited in these videos. The ability for Pornhub, and other online companies to publish this content, and in some cases to profit of crimes committed against children, victims of sex trafficking and sexual assault, is fundamentally contrary to any efforts to increase gender equality in Canada and protect women and youth from sexual exploitation.

In addition, these videos are available online because Pornhub verifies the email address of the account creator and does not require verification of the age or consent of each person featured in subsequent videos that are uploaded..."

26. According to The New York Times article “The Children of Pornhub” dated December 4, 2020, Pornhub attracts 6.8 million new videos a year, with some of the content including non-consensual violence.

27. On December 11, 2019, the Defendants published their own research on Pornhub’s website which included data of the intricacies of online porn viewership. This research indicated the following:

- a) In 2019, Pornhub had over 42 billion visits, which amounts to an average of 115 million visits per day;
- b) In 2019, over 6.83 million new videos were uploaded to Pornhub;
- c) Accordingly, to the website’s “rank change” graphs Canada was the fourth highest ranking country contributing to the traffic on the Defendants’ website.
- d) The “rank change” graphs indicated that the top 20 countries contributing to the websites traffic is equivalent to 79% of the daily traffic. This would amount to Canada contributing 16.8% of the daily traffic, which is approximately 20 million visits; and
- e) The Defendants further allege that visitors from Toronto, Canada approximately spend an average of ten minutes and twenty-five seconds on Pornhub.

28. In early 2020, Senator Ben Sasse of the United States of America called on the Department of Justice to investigate Pornhub for having “made content available worldwide showing women and girls that were victims of trafficking being raped and exploited”.

29. Until December 2020, anyone from the general public were able to upload pornographic content on Pornhub. This content was then available for streaming or download to save for viewing on a personal computer indefinitely.

30. According to an article published by The Globe and Mail, the Defendants waited until December 2020 to block unverified users from uploading new content and suspend millions of videos uploaded by non-verified users across its platforms. However, prior to December 2020, no steps were taken to ensure non-consensual content was not posted on its platforms/websites.
31. Instead, it generated significant revenue and profits from intimate non-consensual videos and images on its websites.
32. Despite knowing that there is an infinite risk that non-consensual content would be uploaded, the Defendants took no steps to ensure that only consensual images and videos would be allowed on websites it owned or operated, directly or indirectly. Instead, the Defendants monetized the non-consensual images and videos for their profit.

CAUSE OF ACTION

a) NEGLIGENCE

33. Christine and the Class plead, that the availability of non-consensual content, including but not limited to, photos and videos of all forms of sexual abuse and sexual assault, on the offending websites is a direct and foreseeable result of those sites' failure to elicit the consent of persons in the photos and videos and to comply with the applicable legal obligations.
34. Christine and the Class further plead, that the Defendants failed to verify whether all persons involved in the images and videos were of legal age and were not victims of child-sexual abuse or child sex trafficking.
35. It is apparent that non-consensual content would not have been accessible to users of the platforms but for the Defendants' breach of its duties owed to the Class Members to securely and responsibly ensure that images and videos are posted with consent.

36. By its actions and omissions, and in the duties owed to the Class Members, the Defendants have breached and violated Class Members' rights and is responsible for the damages suffered, such breaches including;

- a) failing to verify the age of all persons showed on the websites;
- b) failing to validate the consent of the persons showed on the websites;
- c) failing to validate whether videos uploaded on the websites were a result of sexual violence, human trafficking, or child sexual abuse;
- d) failing to prohibit non-verified users to post any content before December 2020;
- e) failing to have effective policies and measures in place to avoid the distribution of non-consensual content on its website;
- f) failing to have an effective removal system in place by failing to remove all non-consensual content from all the Defendants' websites and once informed, failing to remove the information associated with such content;
- g) failing to implement policies or procedures to investigate prospective content partners' business practices and/or reputation;
- h) failing to implement policies or procedures to investigate content users' practices and/or reputation;
- i) failing to implement policies or procedures to investigate each video or image before they were published and accessible to the world, and did not adequately impose steps to ensure consent was obtained by all parties involved in the content uploaded;
- j) failing to implement policies or procedures to investigate on allegations of offences committed by its content partners or users;
- k) failing to take steps to prevent non-consensual content from being re-posted on a

particular website and/or from being posted on any of the other websites owned, operated and/or managed by the Defendants or licensed for use on third party websites;

- l) failing to completely takedown images and videos posted on its websites, related websites or licensed for use on third party websites;
- m) failing to advise Class Members of the existence and availability of technology to prevent non-consensual content from being re-posted on a particular website and/or from being posted on any of the other websites owned, operated and/or managed by the Defendants;
- n) failing to employ enough properly trained content moderators to review the footage on its websites for acts of sex trafficking, sexual violence, child abuse, and rape.
- o) failing to uphold the fundamental human rights for persons to have control over the dissemination of intimate images and videos of oneself.
- p) failing to safeguard the physical and psychological needs of Class Members whose content was used without their consent;

Breach of Confidence and Breach of Privacy

37. The Defendants failed to safeguard and protect the Class Members' personal images.

38. The Defendants knew or ought to have known that their website would be a target avenue of illegal videos uploads since no screening measures were put in place. The Defendants failed to adequately implement proper screening measures which resulted in the Class Members' intimate events being exposed to the general public.

39. The Class Members suffered and continue to suffer from psychological and emotional harm as a result.

40. The Defendants had a duty to place the interests of the Class before their own but failed to do so. Instead, the Defendants favored their own interests over that of the safety and security of the Class.

41. The Defendants breached its duties to Christine and the Class Members. The particulars of the breach include:

- b) failing to protect the privacy and integrity of all persons whose videos and images were uploaded on its platforms;
 - a) failed to investigate and obtain further information as to whether the intimate video and images were confidential and private;
 - b) failed to investigate and obtain further information as to whether all persons involved in the videos and images were of legal consenting age;
 - c) failed to investigate whether the videos and images uploaded onto their platforms were misused to the detriment of the Class Members;
 - d) failed to conceal the identities and obtain consent from all parties involved in the videos and images uploaded on their platforms as the contents of the videos and images were meant to be private unless proven otherwise;
 - e) failed to seek authorization for use of the videos and images to the detriment of the Class Members;
 - f) failed to protect the wrongful appropriation of the Class Members' personality.

Damages Suffered by the Class

42. The circumstances give rise to serious consequences on the Class Members' personal lives, the full extent of which has yet to be determined.

43. On behalf of herself and the Class Members, Christine claims damages and compensation with respect to:

- a. Pecuniary and non-pecuniary damages;
- b. Breach of the *Privacy Act*, RSBC 1996, c. 373, s. 1 (1); breach of the *Privacy Act*, CCSM c. P125, s. 2(1); breach of the *Privacy Act*, RSS 1978, c. P-24, s. 2; breach of the *Privacy Act*, RSNL 1990, c. P-22, s. 3; and breach of the *Civil Code of Quebec* SQ 1991, c. 64 art. 3, 10, 35-37;
- c. Breach of the *Intimate Image Protection Act*, CCSM, c. 187, s. 11 (1); breach of the *Protecting Victims of Non-Consensual Distribution of Intimate Images Act*, RSA 2017, c. P-26.9, s. 3; breach of the *Privacy Amendment Act*, 2018, SS 2018, c. 28, s. 7.3(1); breach of the *Intimate Images and Cyber-protection Act*, SNS 2017, c. 7, s. 2; and breach of the *Intimate Images Protection Act*, RSNL 2018, c. 1-22, s. 4(1);
- d. Loss of privacy including, but not limited to, the publication of embarrassing or private facts, without consent, publicly placing a person in a false light, and intrusion upon seclusion;
- e. Breach of copyright and appropriation of likeness;
- f. Defamation and damage to reputation;
- g. Negligence and gross negligence;
- h. Inducing breach of confidence;
- i. Unjust enrichment;
- j. Fraud;
- k. Psychological or other medical treatment;
- l. General damages to be assessed in the aggregate;
- m. Aggravated damages for mental distress; and

- n. Special damages caused by the unlawful conduct by the defendants as a failure to secure the consent of the Class.
44. Christine and the Class has sustained great pain and suffering from their most intimate moments being exposed to the world without their consent. Their enjoyment of life has been severely diminished.
45. As a result of their most intimate moments being exposed, Christine and the Class sustained damages and losses, which include, but are not limited to:
- a. mental anguish;
 - b. shame, guilt and feelings of worthlessness;
 - c. nervous shock, humiliation, and degradation;
 - d. impairment of her opportunity to experience a normal retirement;
 - e. impairment of her physical health, mental health, and emotional well-being;
 - f. impairment of her ability to support herself;
 - g. emotional and psychological trauma, post-traumatic stress, anxiety and depression;
 - h. insomnia;
 - i. a reduction in the activities which she enjoyed prior to the sexual assault; and
 - j. a reduction in her enjoyment of life.
46. Christine and the Class suffered and will continue to suffer physical, emotional, and mental pain. Their lives were fundamentally changed by the aforementioned exposure and the effect will be everlasting.

47. Christine and the Class were profoundly affected by the Defendants' actions in a negative way and as a result suffered the following:
- a. mistrust of men;
 - b. mistrust of public transit, specifically rideshare drivers;
 - c. inability to engage in normal human relations, including difficulties with trust;
 - d. disassociation; and
 - e. insomnia.
48. As a result of the exposure of their intimate moments, Christine's and the Class' ability to carry a normal life has been extinguished because of ongoing pain and suffering caused by the actions and inactions of the Defendants.
49. Christine and the Class suffered physical, mental, psychological, and emotional stress which will be everlasting.
50. As a result of the exposure of their intimate moments, Christine and the Class have undergone and will continue to undergo extended therapy, rehabilitation, and other forms of medical treatment, and, in addition, has received and will continue to receive medication for their injuries.
51. As a result of the exposure of their intimate moments, Christine and the Class have incurred and will continue to incur attendant care expenses, as well as expenses for medication, therapy, rehabilitation, medical treatment and other forms of care, the full particulars of which will be provided prior to trial.
52. As a result of the exposure of their intimate moments, Christine and the Class are unable to perform household chores to the extent that they were able to before the exposure of their intimate moments and have required and will require assistance in the future to complete such chores.

53. On behalf of Christine and the Class Members, Christine also claims aggravated, punitive, and exemplary damages, the particulars of which will be provided prior to trial.

Punitive Damages Requested

54. The Defendants' conduct was arrogant, high-handed, reckless, without care, deliberate, and with disregard to Christine and the Class Members. The Defendants knew or ought to have known that its actions and omissions would have a significant adverse effect on the Class Members.

55. The Defendants knew that they were responsible for the safety and security of people's most private and intimate images, they failed to keep those videos and images safe, and failed to obtain all parties' consent.

56. The Defendants' conduct was sufficiently harsh, vindictive, reprehensible, and malicious so as to justify awarding punitive, exemplary, and aggravate damages against The Defendants.

57. The Defendants failed to put in place appropriate safeguards in regulating content on their sites, instead favouring their own interests over those of the Class. The Defendants have considerable assets. An award of \$100,000,000.00 for punitive, aggravated, and exemplary damages is justified to punish the Defendants and deter their inappropriate conduct in the future, as well as deter other companies from acting in the same manner.

THE RELEVANT STATUTES

58. Christine and the Class Members plead and rely upon, and the amendments made thereto and the regulations thereunder and the Provincial equivalents:

a) *Class Proceedings Act*, 1992, S.O. 1992, c. 6

b) *Copyright Act*, RSC 1985, c C-42

c) *Criminal Code*, RSC 1985, c C-46

d) *Intimate Images and Cyber-protection Act*, SNS 2017, c. 7;

- e) *Intimate Image Protection Act*, CCSM, c. 187;
- f) *Intimate Images Protection Act*, RSNL 2018, c. 1-22;
- g) *Negligence Act*, R.S.O. 1990, c. N.1.
- h) *Privacy Act*, CCSM c P125;
- i) *Privacy Act*, RSNL 1990, c. P-22;
- j) *Privacy Act*, RSS 1978, c. P-24;
- k) *Privacy Amendment Act*, 2018, SS 2018, c. 28,
- l) *Protecting Victims of Non-Consensual Distribution of Intimate Images Act*, RSA 2017, c. P-26.9;
- m) *The Privacy Amendment Act*, 2018, SS 2018, c. 28.

November 1, 2021

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WING et al.
Plaintiffs

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9219-1568 QUEBEC INC. et al.
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Proceeding Commenced at Oshawa

STATEMENT OF CLAIM

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