

The State of Texas



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www.sos.state.tx.us

Secretary of State

June 30, 2014

Pinkmeth.Com
C/O Bristow Law PLLC
P O Box 1954
Clarkston, MI 48347

2014-241588-1

Include reference number in
all correspondence

RE: Shelby Conklin VS Pinkmeth.Com aka pinkmethuynlenlz.onion.lt and The Tor Project
Inc
431st Judicial District Court Denton County, Texas
Cause No: 1404555431

Dear Sir/Madam,

Pursuant to the Laws of Texas, we forward herewith by CERTIFIED MAIL, return receipt requested, a copy of process received by the Secretary of State of the State of Texas on June 24, 2014.

CERTIFIED MAIL #71901046470100337328

Refer correspondence to:

Jason L Van Dyke
The Van Dyke Law Firm PLLC
200 Chisholm Place
#250
Plano, TX 75075

Sincerely,

A handwritten signature in cursive script that reads "Helen Lupercio".

Helen Lupercio
Team Leader, Service of Process
CT/vo
Enclosure

CITATION – Personal Service: TRC 99 and 106

THE STATE OF TEXAS COUNTY OF DENTON
 CAUSE NO. 14-04555-431

TO: Pinkmeth.com, c/o Texas Secretary of State, 1019 Brazos, Austin, TX 78701 (or wherever he/she may be found)

Notice to defendant: You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the first Monday following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Court:	431st Judicial District Court 1450 E, McKinney, 2nd Floor, Denton, TX 76209
Cause No.:	14-04555-431
Date of Filing:	June 17, 2014
Document:	Plaintiff's Original Petition, Application for Injunctive Relief, and First Request for Admissions to Pinkmeth.com
Parties in Suit:	Shelby Conklin; PinkMeth.Com; The TOR Project Inc.
Clerk:	Sherri Adelstein, District Clerk 1450 E. McKinney, Suite 1200, Denton, TX 76209
Party or Party's Attorney:	Jason Lee Van Dyke 200 Chisholm Place, #250, Plano, TX 75075

Issued under my hand and seal of this said court on this the 18th day of June, 2014.



Sherri Adelstein, District Clerk
 Denton, Denton County, Texas

Cameron Welter, Deputy
 Cameron Welter

Service Return

Came to hand on the _____ day of _____, 20____, at _____ m., and executed on the _____ day of _____, 20____, at _____ M by delivering to the within named _____

_____ in person a true copy of this citation, with attached copy(ies) of the Plaintiff's Original Petition, Application for Injunctive Relief, and First Request for Admissions to Pinkmeth.com at _____

Service Fee: \$ _____ Sheriff/Constable _____ County, Texas
 Deputy/Authorized Person _____

VERIFICATION

On this day personally appeared _____ known to me to be the person whose name is subscribed on the foregoing instrument and who has stated: upon penalty of perjury, I attest that the foregoing instrument has been executed by me in this cause pursuant to the Texas Rules of Civil Procedure. I am over the age of eighteen years and I am not a party to or interested in the outcome of this suit, and have been authorized by the Denton County Courts to serve process.

Subscribed and sworn to before me on this the _____ day of _____, 20____ Notary Public

RECEIVED
 14 JUN 22 AM 9:48
 SECRETARY OF STATE
 AUSTIN, TEXAS



RECEIVED

00241588

COPY

CAUSE NO. 14-04555-431

SHELBY CONKLIN
Plaintiff,

v.

PINKMETH.COM a/k/a
pinkmethuynlenlz.onion.lt; and
THE TOR PROJECT, INC.
Defendants.

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IN THE DISTRICT COURT

_____ JUDICIAL DISTRICT

DENTON COUNTY, TEXAS

**PLAINTIFF'S ORIGINAL PETITION, APPLICATION FOR INJUNCTIVE RELIEF,
AND FIRST REQUEST FOR ADMISSIONS TO PINKMETH.COM**

I. DISCOVERY CONTROL PLAN

- 1.1 Discovery in this case is intended to be conducted under level 2 of rule 190 of the Texas Rules of Civil Procedure.

II. PARTIES

- 2.1 Plaintiff is Shelby Conklin who is a resident of Denton County, Texas.
- 2.2 Defendant, Pinkmeth.com a/k/a pinkmethuynlenlz.onion.lt ("Pinkmeth"), a foreign partnership, may be served with process by and through the Texas Secretary of State at 1019 Brazos, Austin, Texas 78701. Service in this manner is authorized because (a) Defendant is a foreign partnership engaging in business in this state; (b) Defendant does not maintain a registered agent in Texas (or any other state); and (c) Defendant does not maintain a regular place of business in Texas (or any other state). Tex. Civ. Prac. & Rem. Code § 17.044(b)
- 2.3 Upon receipt of process for Pinkmeth, the Texas Secretary of State is directed to forward it to Defendant's **home office** at the following address: PinkMeth.Com, c/o Bristow Law P.L.L.C., PO Box 1954, Clarkston, MI 48347. See *Mahon v. Caldwell, Haddad, Skaggs, Inc.* 783 S.W.2d 769, 771 (Tex. App. – Fort Worth 1990, no writ). This is the only

ORIGINAL PETITION

Page 1 of 30

00241588

physical address listed on the Pinkmeth website, and furthermore, it is listed by Pinkmeth as the address for service of removal requests.

- 2.4 Defendant, The TOR Project Inc. (“TOR”), a Massachusetts non-profit corporation, may be served with process by and through its President, Roger Dingleline, at 1558 Massachusetts Ave., #24, Cambridge, MA 02138. Service in this manner is specifically authorized by Tex. Rev. Civ. Stat. art. 1396-2.07A.

III. JURISDICTION AND VENUE

- 3.1 Pinkmeth is an “involuntary pornography” or “revenge pornography” businesses on a World Wide Web. This Court has jurisdiction over the website and all of its administrators under the Texas Long Arm Statute because they (a) operate illegal “involuntary pornography” or “revenge pornography” websites on the World Wide Web that are accessible to and targets residents of the State of Texas; and (b) have committed acts that they knew or should have known would cause injury to Plaintiff in the State of Texas. Tex. Civ. Prac. & Rem. Code § 17.042. The facts alleged in this petition clearly demonstrate that Pinkmeth purposefully committed a tort in Texas against a Texas resident, that the causes of action alleged herein against Pinkmeth arise from its conduct in Texas, and that assumption of jurisdiction over Pinkmeth will not offend traditional notions of fair play and substantial justice. *Biotrace Int’l Inc. v. Lavery*, 937 S.W.2d 146, 147 (Tex. App. – Houston [1st Dist] 1997, no writ).
- 3.2 According to its website, TOR “was originally designed, implemented, and deployed as a third-generation onion routing project of the U.S. Naval Research Laboratory. It was originally developed with the U.S. Navy in mind, for the primary purpose of protecting government communications.” The TOR website further states that their products and

services are used by individuals “to keep websites from tracking them and their family members, or to connect to news sites, instant messaging services, or the like when these are blocked by their local Internet providers.” TOR also provides services that permit users, such as Pinkmeth, to “publish web sites and other services without needing to reveal the location of the site.” This Court has jurisdiction over TOR because it (a) advertises and offers the services referenced above in Texas and to Texas residents. Individuals also use Tor for socially sensitive communication: chat rooms and web; and (b) knowingly assists websites such as Pinkmeth in committing torts against residents of Texas. Tex. Civ. Prac. & Rem. Code § 17.042. It is clear from the TOR website that TOR is knowingly assisting websites such as Pinkmeth in committing torts against Texas resident, that the sole cause of action alleged against TOR herein (conspiracy) arises from its conduct in Texas and against Texas residents, and that assumption of jurisdiction by this Court will not offend traditional notions of fair play and substantial justice. *Biotrace*, 937 S.W.2d at 147.

- 3.3 Venue is appropriate in this Court because Plaintiff is a student at the University of North Texas, is a resident of Denton County, Texas, and suffered her injuries in Denton County, Texas.

IV. FACTS COMMON TO ALL CLAIMS

- 4.1 The domain name “com”, as used in “Pinkmeth.com” is a top level domain in the domain name system of the Internet. The “com” domain name is derived from the word *commercial*, indicating that its original intended purpose for domains registered by commercial organizations. The “com” domain name, together with the “org” and “net” domain names were ultimately opened for unrestricted registration. On information and

belief, “com” is now the most common top level domain name used on the World Wide Web.

4.2 As with much of the Internet, the “com” domain name was originally administered by the U.S. Department of Defense, but is today operated by a private entities: VeriSign, Inc. and The Internet Corporation for Assigned Names and Numbers (ICANN). This entity maintains complete and exclusive control over all “com” domain name registrations and has both the ability and the authority to remove websites from the World Wide Web which violate the laws of the United States of America or websites ordered to be removed by courts of competent jurisdiction. The “lt” top level domain is affiliated with the government of Lithuania, although domains with the “lt” domain do not typically have any connection to the government of Lithuania.

4.3 A person or entity wishing to purchase or register a domain name typically does so through the use of a domain name registrar. Up until the introduction of federal legislation to reduce the practice of “cybersquatting” and the extension of federal copyright and trademark statutes to protect domain names, virtually any person could register a domain name for any reason. Among the most notorious examples of this is the distinction between “whitehouse.gov”, which is the official website of the President of the United States, and “whitehouse.com” which is a known pornography website.

4.4 The World Wide Web operates using web “browsers” such as Internet Explorer, Mozilla Firefox, and Google Chrome to read a web-based programming language commonly known as HTML. Computer files coded in this language are typically stored on large host computers or services. Domain name hosting services are provided by hosting

companies, but many companies offer both registrar services and hosting services. However, unscrupulous Internet service companies such as TOR offer “private” or “anonymous” domain name hosting services that allow criminals such as Pinkmeth and its users to escape accountability for their actions. TOR even advertises that with their service “nobody would be able to determine who was offering the site, and nobody who offered the site would know who was posting to it.” A description from TOR regarding how its service works is attached hereto as Exhibit “A” and incorporated by reference herein.

4.5 A person registering a domain name and purchasing hosting services is typically required to provide, at the very least, the contact information for the administrator of the website. However, many unscrupulous companies offer services that allow illegal websites such as Pinkmeth to remain anonymous and difficult for authorities to shut down. Indeed, Pinkmeth’s Twitter feed advertises its website as being a website “where your state laws don’t apply.” A copy of this post is attached hereto as Exhibit “B” and incorporated by reference herein.

4.6 Pinkmeth is a “revenge pornography” or “involuntary pornography” websites. The purpose of these illicit websites is to solicit and post suggestive and naked photographs and videos of persons who were recorded without their consent or permission. Websites such as PinkMeth.com also solicit computer hackers to gain unauthorized access to such files belonging to Plaintiff and similarly situated individuals for the purpose of uploading them to the website.

4.7 To further invade the privacy of their victims, Pinkmeth also posts the social media pages of their victims including, but not limited to their Facebook profiles, for the purpose of

embarrassing and harassing them and/or encouraging others to embarrass and harass them. Pinkmeth advertised that it is “a TOR hidden service that allows you to post anyone’s nudes and info . . . no entries will be removed.” The Pinkmeth website offers a link to securely access its website through TOR, but also offers an unsecured connection so as to permit users that do not employ TOR to view its content. A copy of its main page is attached hereto as Exhibit “C” and incorporated by reference herein.

- 4.8 Pinkmeth and similar websites do not obtain the permission of their victims prior to posting pornographic images of them (and the names of their hometowns) on the World Wide Web. Furthermore, Defendants do not verify the ages of their victims prior to posting pornographic images of them on the World Wide Web. On information and belief, several of their victims are under the age of eighteen (18) years. Thus, PinkMeth.com is ostensibly engaged in the illegal distribution of child pornography. Furthermore, Defendant’s activities constitute felony offenses in Texas. Tex. Penal Code 21.15(b) (improper photography).
- 4.9 Pinkmeth cannot claim “fair use” of any of the images they have misappropriated on its website because the illegal publication of child pornography and adult pornography (in violation of 18 U.S.C. § 2257) can never be lawful. *Id.* In the specific case of the Plaintiff, she owns all copyrights to the images stolen by Defendant. She has never given Defendant, or any other person, permission to access or distribute her photographs.
- 4.10 Plaintiff has been a victim of the practices of Defendants described in paragraphs 4.1 – 4.10 above. Specifically, Plaintiff alleges that Pinkmeth committed these acts against her by obtaining unauthorized access to private social media accounts and that TOR has conspired with Pinkmeth to make these images available online to an Internet user.

V. CAUSES OF ACTION AGAINST PINKMETH.COM

(Count One – Intrusion of Seclusion)

- 5.1 Plaintiff incorporates all of the allegations contained in paragraphs 1.1 – 4.10 above herein by reference.
- 5.2 Pinkmeth has intentionally intruded on Plaintiff's solitude, seclusion, or private affairs. Specifically, Pinkmeth gained unauthorized access to nude photographs constituting the property of Plaintiff and posted them on the world wide web.
- 5.3 The intrusion complained of in paragraph 5.2 above would be highly offensive to a reasonable person.
- 5.4 Plaintiff has suffered damages for mental anguish and loss of earning capacity in an amount within the jurisdictional limits of this Court. The amount of Plaintiff's damages are at least \$1 million.

(Count Two – Public Disclosure of Private Facts)

- 5.5 Plaintiff incorporates by reference herein the allegations contained in paragraphs 1.1 – 5.4 above.
- 5.6 Pinkmeth publicized information about the Plaintiff's private life or knowingly allowed such information to be publicized anonymously using servers and computers under its control.
- 5.7 The publicity would be highly offensive to a reasonable person.
- 5.8 The matter publicized is not of legitimate public concern.
- 5.9 Plaintiff has suffered injury for mental anguish and loss of earning capacity as a result of this disclosure by Pinkmeth or by persons with whom Pinkmeth is acting in concert. The amount of Plaintiff's damages are at least \$1 million.

(Alternative Theory – Intentional Infliction of Emotional Distress)

- 5.10 Plaintiff is a person seeking relief in her individual capacity.
- 5.11 Defendant acted intentionally or recklessly in publishing private photographs of Plaintiff, obtained and used without her authorization, on the World Wide Web.
- 5.12 The conduct of Defendants was extreme and outrageous.
- 5.13 The emotional distress suffered by Plaintiff was severe and the conduct of Defendant was, and continues to be, the proximate cause of Plaintiff's emotional distress.
- 5.14 No alternative cause of action would provide a remedy for the severe emotional distress caused by the conduct of Defendant.

(Exemplary Damages)

- 5.15 Plaintiff alleges that she can prove all of the causes of action alleged in this petition against Pinkmeth by clear and convincing evidence and also that Pinkmeth acted with malice. For these reasons, Plaintiff claims she is entitled to additional exemplary damages in an amount to be determined by this Court.

VI. CAUSES OF ACTION AGAINST TOR

(Civil Conspiracy)

- 6.1 A civil conspiracy consists of a combination of two or more persons to accomplish an unlawful purpose or a lawful purpose by unlawful means.
- 6.2 Pinkmeth and TOR conspired to and had a meeting of the minds regarding the commission certain torts against Plaintiff more adequately described in paragraphs 5.1 – 5.15 above, as well as certain felony offense described in paragraph 4.8 and 4.9 above. The specific object to be accomplished by the conspiracy was the publication pornographic images of Plaintiff (and other women) on the Pinkmeth website in such a

manner so as to prevent its operators and users from being held civilly and criminally accountable for this unlawful behavior.

- 6.3 Plaintiff has suffered damages as a result of this conspiracy in the amount of at least \$1 million.

VII. TEMPORARY AND PERMANENT INJUNCTIVE RELIEF

- 7.1 Plaintiff has and will continue to be damaged by unauthorized access by Pinkmeth to her personal information, the posting of nude photographs of her on the PinkMeth.com and pinkmethuynlenlz.onion.lt website, and TOR's continued tolerance and endorsement of Pinkmeth's presence on the Internet.
- 7.2 Plaintiff is a criminal justice major at the University of North Texas. The presence of these photographs on the World Wide Web will substantially diminish any likelihood that she will be able to obtain a career in law enforcement. Plaintiff would also show that she has been placed in fear of her safety due to the existence of these photographs and, since they have been posted, has received several threatening or otherwise disconcerting electronic communications. The threats have been so severe that she has obtained a handgun and a concealed handgun license to protect herself from sexual assault and other criminally deviant behavior by Pinkmeth's operators and users.
- 7.3 Plaintiff would show that she has a substantial likelihood of success on her claims against Defendants. The nude photographs of Plaintiff were obtained without authorization and were posted on the World Wide Web without her consent. Furthermore, the posting of these photographs constitutes the illegal distribution of pornography in violation of federal law and improper photography in violation of Texas law.
- 7.4 Plaintiff has no adequate remedy at law for the injuries and losses which she is incurring

in this matter.

7.5 Plaintiff requests that this Court enter all such temporary and permanent orders as may be necessary to completely eliminate Pinkmeth's digital/Internet presence. A failure by this Court to enter an all-encompassing order designed specifically to cripple Pinkmeth will accomplish nothing other than to require Plaintiff to file a new lawsuit once Pinkmeth finds a new company willing to host their illegal activities. Specifically, Plaintiff is requesting that:

- (a) All top level domain name providers and companies, including Verisign Inc. and ICAAN, cause "pinkmeth.com" and other websites containing the "pinkmeth" verbage to be obliterated or otherwise rendered permanently inaccessible;
- (b) All domain name registrars and hosting companies, including TOR, be enjoined and restricted from providing, or continuing to provide, any Internet-related services to the Pinkmeth;
- (c) All search engines companies (e.g. Google and Yahoo) be enjoined from (i) including any pornographic photographs of Plaintiff in their search engine results; and (ii) including Pinkmeth in their search engine results;
- (d) All social media websites (e.g. Facebook, Twitter) be enjoined from permitting Defendant to utilize their services.

7.6 Plaintiff requests that an application for temporary restraining order be granted in all respects, without the need for a hearing, until such a time as a full hearing on the merits can be conducted.

7.7 Further, upon hearing, Plaintiff requests that this Court enter a temporary and permanent

injunctive relief as requested in paragraph 7.5 above.

- 7.8 Plaintiff is willing to post bond and alleges that a nominal bond in the amount of \$100.00 is sufficient in this matter due to the fact that Pinkmeth is operating an illegal enterprise. TOR cannot be “damaged” if they are compelled to remove such a website from their service and the operators of Pinkmeth also cannot be “damaged” if they are deprived of nothing more than the opportunity to engage in illegal conduct.

VIII. REQUESTS FOR ADMISSIONS

- 8.1 Plaintiff, Shelby Conklin, serves the requests for admissions attached hereto as Exhibit “D” and incorporated by reference herein on Defendant, PinkMeth.com as allowed by Tex. R. Civ. P 198. PinkMeth.com must admit or deny each request, in writing, within 50 days after service.

IX. PRAYER

- 9.1 Plaintiff prays that—
- a. Defendants be cited to appear and answer;
 - b. Plaintiff be granted temporary and permanent injunctive relief against Defendants;
 - c. Plaintiff be granted judgment for actual damages against Defendants for mental anguish and loss of earning capacity in the amount of at least \$1,000,000.00
 - d. Plaintiff be granted judgment for exemplary damages against Pinkmeth in such amount as this Court deems just and appropriate under the circumstances.
 - e. Plaintiff be granted judgment for pre-judgment and post-judgment interest at the highest rates permitted by law;
 - f. Plaintiff be granted judgment for all costs of court; and

g. Plaintiff be granted all further relief to which Plaintiff may be entitled.

Respectfully submitted,

THE VAN DYKE LAW FIRM P.L.L.C.

/s/ Jason Lee Van Dyke

Jason L. Van Dyke

State Bar No. 24057426

200 Chisholm Place, #250

Plano, TX 75075

P – (469) 964-5346

F – (972) 421-1830

jason@vandykelawfirm.com

EXHIBIT “A”

Home **About Tor** Documentation Press Blog Contact

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Tor Overview

Users of Tor

Tor People

Jobs

Sponsors

Financial Reports

Projects

Documentation

Tor Tip

Tor is written for and supported by people like you. [Donate today!](#)

Tor: Overview

Topics

- [Inception](#)
- [Overview](#)
- [Why we need Tor](#)
- [The Solution](#)
- [Hidden services](#)
- [Staying anonymous](#)
- [The future of Tor](#)

Inception

Tor was originally designed, implemented, and deployed as a third-generation [onion routing project of the U.S. Naval Research Laboratory](#). It was originally developed with the U.S. Navy in mind, for the primary purpose of protecting government communications. Today, it is used every day for a wide variety of purposes by normal people, the military, journalists, law enforcement officers, activists, and many others.

Overview

Tor is a network of virtual tunnels that allows people and groups to improve their privacy and security on the Internet. It also enables software developers to create new communication tools with built-in privacy features. Tor provides the foundation for a range of applications that allow organizations and individuals to share information over public networks without compromising their privacy.

Individuals use Tor to keep websites from tracking them and their family members, or to connect to news sites, instant messaging services, or the like when these are blocked by their local Internet providers. Tor's [hidden services](#) let users publish web sites and other services without needing to reveal the location of the site. Individuals also use Tor for socially sensitive communication: chat rooms and web forums for rape and abuse survivors, or people with illnesses.

Journalists use Tor to communicate more safely with whistleblowers and dissidents. Non-governmental organizations (NGOs) use Tor to allow their workers to connect to their home website while they're in a foreign country, without notifying everybody nearby that they're working with that organization.

Groups such as Indymedia recommend Tor for safeguarding their members' online privacy and security. Activist groups like the Electronic Frontier Foundation (EFF) recommend Tor as a mechanism for maintaining civil liberties online. Corporations use Tor as a safe way to conduct competitive analysis, and to protect sensitive procurement patterns from eavesdroppers. They also use it to replace traditional VPNs, which reveal the exact amount and timing of communication. Which locations have employees working late? Which locations have employees consulting job-hunting websites? Which research divisions are communicating with the company's patent lawyers?

A branch of the U.S. Navy uses Tor for open source intelligence gathering, and one of its teams used Tor while deployed in the Middle East recently. Law enforcement uses Tor for visiting or surveilling web sites without leaving government IP addresses in their web logs, and for security during sting operations.

The variety of people who use Tor is actually [part of what makes it so secure](#). Tor hides you among [the other users on the network](#), so the more populous and diverse the user base for Tor is, the more your anonymity will be protected.

Why we need Tor

Using Tor protects you against a common form of Internet surveillance known as "traffic analysis." Traffic analysis can be used to infer who is talking to whom over a public network. Knowing the source and destination of your Internet traffic allows others to track your behavior and interests. This can impact your checkbook if, for example, an e-commerce site uses price discrimination based on your country or institution of origin. It can even threaten your job and physical safety by revealing who and where you are. For example, if you're travelling abroad and you connect to your employer's computers to check or send mail, you can inadvertently reveal your national origin and professional affiliation to anyone observing the network, even if the connection is encrypted.

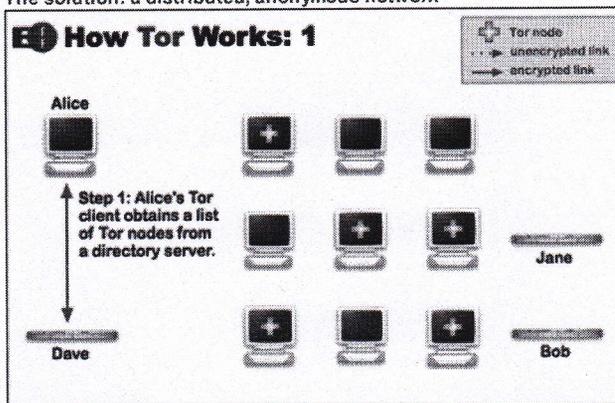
How does traffic analysis work? Internet data packets have two parts: a data payload and a header used for routing. The data payload is whatever is being sent, whether that's an email message, a web page, or an audio file. Even if you encrypt the data payload of your communications, traffic analysis still reveals a great deal about what you're doing and, possibly, what you're saying. That's because it focuses on the header, which discloses source, destination, size, timing, and so on.

A basic problem for the privacy minded is that the recipient of your communications can see that you sent it by looking at headers. So can authorized intermediaries like Internet service providers, and sometimes unauthorized intermediaries as well. A very simple form of traffic analysis might involve sitting somewhere between sender and recipient on the network, looking at headers.

But there are also more powerful kinds of traffic analysis. Some attackers spy on multiple parts of the Internet and use

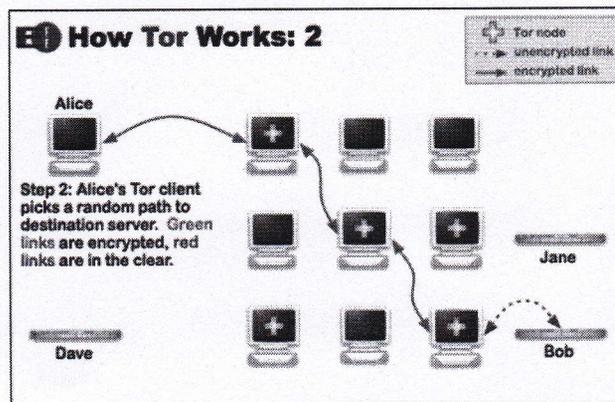
sophisticated statistical techniques to track the communications patterns of many different organizations and individuals. Encryption does not help against these attackers, since it only hides the content of Internet traffic, not the headers.

The solution: a distributed, anonymous network



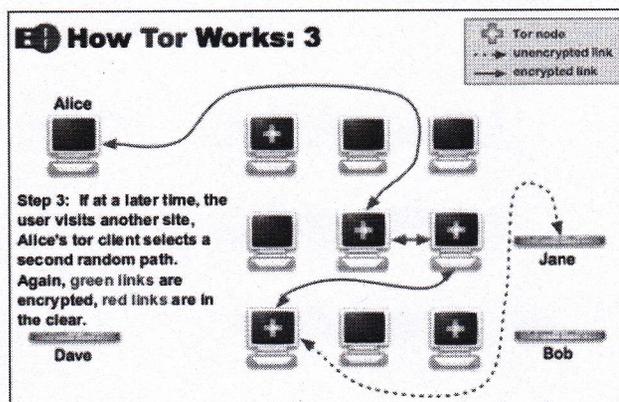
Tor helps to reduce the risks of both simple and sophisticated traffic analysis by distributing your transactions over several places on the Internet, so no single point can link you to your destination. The idea is similar to using a twisty, hard-to-follow route in order to throw off somebody who is tailing you — and then periodically erasing your footprints. Instead of taking a direct route from source to destination, data packets on the Tor network take a random pathway through several relays that cover your tracks so no observer at any single point can tell where the data came from or where it's going.

To create a private network pathway with Tor, the user's software or client incrementally builds a circuit of encrypted connections through relays on the network. The circuit is extended one hop at a time, and each relay along the way knows only which relay gave it data and which relay it is giving data to. No individual relay ever knows the complete path that a data packet has taken. The client negotiates a separate set of encryption keys for each hop along the circuit to ensure that each hop can't trace these connections as they pass through.



Once a circuit has been established, many kinds of data can be exchanged and several different sorts of software applications can be deployed over the Tor network. Because each relay sees no more than one hop in the circuit, neither an eavesdropper nor a compromised relay can use traffic analysis to link the connection's source and destination. Tor only works for TCP streams and can be used by any application with SOCKS support.

For efficiency, the Tor software uses the same circuit for connections that happen within the same ten minutes or so. Later requests are given a new circuit, to keep people from linking your earlier actions to the new ones.



Hidden services

Tor also makes it possible for users to hide their locations while offering various kinds of services, such as web publishing or an instant messaging server. Using Tor "rendezvous points," other Tor users can connect to these hidden services, each without knowing the other's network identity. This hidden service functionality could allow Tor users to set up a website where people publish material without worrying about censorship. Nobody would be able to determine who was offering the site, and nobody who offered the site would know who was posting to it. Learn more about [configuring hidden services](#) and how the [hidden service protocol](#) works.

Staying anonymous

Tor can't solve all anonymity problems. It focuses only on protecting the transport of data. You need to use protocol-specific support software if you don't want the sites you visit to see your identifying information. For example, you can use the [Tor Browser Bundle](#) while browsing the web to withhold some information about your computer's configuration.

Also, to protect your anonymity, be smart. Don't provide your name or other revealing information in web forms. Be aware that, like all anonymizing networks that are fast enough for web browsing, Tor does not provide protection against end-to-end timing attacks: If your attacker can watch the traffic coming out of your computer, and also the traffic arriving at your chosen destination, he can use statistical analysis to discover that they are part of the same circuit.

The future of Tor

Providing a usable anonymizing network on the Internet today is an ongoing challenge. We want software that meets users' needs. We also want to keep the network up and running in a way that handles as many users as possible. Security and usability don't have to be at odds: As Tor's usability increases, it will attract more users, which will increase the possible sources and destinations of each communication, thus increasing security for everyone. We're making progress, but we need your help. Please consider [running a relay](#) or [volunteering](#) as a [developer](#).

Ongoing trends in law, policy, and technology threaten anonymity as never before, undermining our ability to speak and read freely online. These trends also undermine national security and critical infrastructure by making communication among individuals, organizations, corporations, and governments more vulnerable to analysis. Each new user and relay provides additional diversity, enhancing Tor's ability to put control over your security and privacy back into your hands.



Trademark, copyright notices, and rules for use by third parties can be found [in our FAQ](#).

About Tor

[What Tor Does](#)
[Users of Tor](#)
[Core Tor People](#)
[Sponsors](#)
[Contact Us](#)

Get Involved

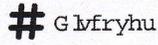
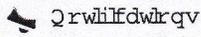
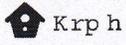
[Donate](#)
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[Mirrors](#)
[Hidden Services](#)
[Translations](#)

Documentation

[Manuals](#)
[Installation Guides](#)
[Tor Wiki](#)
[General Tor FAQ](#)



EXHIBIT “B”



Pink Meth
@pinkmeth



Following

Pink Meth: where your state laws don't apply.

Reply Retweet Favorite More

FAVORITE

1



7:30 PM - 2 Jun 2014

Reply to @pinkmeth

#347 #tz lwhu #Derxw #Khs #Dgv#qir

EXHIBIT “C”

Hello, world!

Pink Meth is a Tor Hidden Service (<https://www.torproject.org/docs/hidden-services.html.en>) that allows you to post anyone's nudes and info. Everything except CP and fakes is allowed. No entries will be removed.

You will need to have Tor (<https://www.torproject.org/>) software installed on your computer to securely access Pink Meth.

Access the Onion » (<http://pinkmethuynenz.onion/>)

Cleartnet Access

- <https://pinkmethuynenz.onion.it> (<https://pinkmethuynenz.onion.it>)

What Others Say About Pink Meth & Entry Comments

Seriously, even with as much of a nympho as i am and with as much porn as i watch, i wouldn't ever think to type in PinkMeth in the search bar... Seriously, PINK...METH...

— Melody

So you hide your domain in the most lawless country outside DRC and Afghanistan. What's a matter, afraid of being caught right here in the US? When's graduation for you middle school kids?. XD

— Anonymous

lol. Pink Meth isn't even a name anymore. It is just numbers and punctuation marks.

— Anonymous

As a female, and I suggest other females to do the same, the next time you are with your significant other take a picture of their penis and their body. We all know the divorce rate percentage.

— Anonymous

I like pink meth, I finally got to see a girl I had a crush on naked... I love it.

— Anonymous

So don't pretend that PM is some kind of place where smart women like to hang out. Apparently it's full of waiting staff and self-harmers. And your girlfriend.

— Anonymous

And it seems that the site is not working right now, but like most every other time it's been down, they'll have it fixed in no time.

— Anonymous

The commenters on PinkMeth are turned on by a goddamn DMCA

— Anonymous

Her body is so white that I would declare Jihad on her body any day.

— Anonymous

I just threw up.

— Anonymous

Do you think of me as a fool? She has told me of one site and I believe she would have told of the rest. Besides, none of these IP addresses are hers, idiot. I know which devices she goes on and I know for a fact that she would not lie to me. Sine this website's encryption is poor as fuck if they even got any was really easy to hack and gain access to the IP addresses that access the site. They really should get a new webmaster and actually make legal agreements before making a website. Amanda would not post pictures of herself on this ridiculous site. Whoever posted these better get rid of them before I find out who they are and they find themselves in their own death bed.

— Anonymous

Lol Pink Meth Staff. Do you think I am an 11 year old that thinks those claim a prize scams are real? Imfao You guys just made my night. I am laughing so hard. For a fact, Fools, I have already sent you guys an e-mail awhile ago about this matter. Pink Meth is nothing but filled with a bunch of pussy-less losers that can't even make a decent website. Wow. Even in my basic web designing class I done some thing far better than this. Encrypted and everything. I even had some of my friends try hacking it and they horribly failed. Look into getting a better web master and also a better staff. You guys are fucking idiots. Get the pot out of your mouth, quit snorting coke, and get the dick out of your asses. This website is one thing the world doesn't need right now. No wonder why a lot of people hate the East countries.

— Anonymous

WOW!!! This is scary! Even for the South...

— Anonymous

Dude. WHAT THE FUCK... That is not a woman, it's an animal. You sick fucks.

— Anonymous

Are we hitting a new low at this place ,first the junkie second the hillbillie and now granma

— Anonymous

Holy fat fuck batman! Another Massachusetts welfare pig! 24 years old and 170 pounds? WTF?

— Anonymous

Lol, Pink Meth Staff. All you guys are lonely fuck tards that can't get any pussy what-so-ever. I bet you wouldn't even be able to get into a tranny's pants. Imfao. And, haven't you heard of nudity art? Used to do a lot of it in the older days, but now there are nothing but a bunch of perverted freaks. Here's a tip for you all. The best type of guy a woman likes is a gentleman. Yeah. Gentlemen probably get a hell lot more pussy than all of you guys. Plus, they get more stable relationships than freaks do. rofl Peace Pink Meth. Expect all your systems to be down and fried. Hope you guys are smart enough to make back ups. Imfao. But hey, every time this website comes up, it will just go back down. Hah hah hah.

— Anonymous

I suppose opening that umbrella indoors proved to be terrible luck afterall.

— Anonymous

To the creator of this site.. Thank you.. You're a genius.

— Anonymous

That is not a real vagina..especially that last picture? I haven't seen *all* the vaginas in the world but I've seen a bunch and that is some surgically created craziness.

— Anonymous

If anything this site proves how bad social network sites like facebook are and how easy it is to find someone and all there personal information.

— Anonymous

Who's sicker? The one taking the picture in a mirror admiring herself or the one looking at it, next time do not take pictures of yourself and send them to your boyfriend because when you cheat on him this is the place to find them.

— Anonymous

Her FB says she knows seven languages. Hmm. She certainly is fluent in sluttish.

— Anonymous

She has a black kid. She's already a disappointment to her family.

— Anonymous

Pink Meth ... bringing people together.

— Anonymous

This whole site is really interesting. The photos on here that are of me are strange relics of a different time. A bit unflattering, but generally an image of me finding my way towards a sex-positive feminist analysis. I can't say that I regret that exploration. At first, I saw this site and panicked, but then I thought about it and realized that I work in victim's services. No one I work for would consider holding exploitive behavior like this against the victim. My mom, boyfriend, and family know everything that's true on here. My mom and I had a heart-to-heart about it a while ago, and my boyfriend and I have been talking about sex since we met. There's nothing that you can do with this information that could hurt me, besides mild embarrassment with one or two random acquaintances. All pornography is much more about the consumer than the producer, and this is especially interesting from that perspective. What draws a consumer to this site is the ability to have power over another individual. Maybe the need for that is driven by something stereotypical like rejection from many women. Maybe it's a more instinctual need to be important, to be feared. I'm sure it's the same need that leads many to commit rape and other atrocities. I'm not sure what drew each of you here, but I hope you learn from it the same way that I learned from my early sexual exploration. Find that monster within you who wants to destroy things that are weak, and decide if that's really who you choose to be today. I may not be as weak as the narrative you've created in your minds. Goodluck wrestling with that and goodluck wrestling with your selves.

— Rae B.

Save As... Remember everytime you repost these images on another page an angel gets their wings

— Anonymous

THIS SITE IS TO BE DELETED IMMEDIATELY.

— Anonymous

I want to high school with Ken Meyers , what a loser. We all thought by now he would be in jail but we stand corrected, he took a job away from a Mexican to remove asbestos and goes out with a whore with STD

— Anonymous

You ppl think I really care what you think of me? You are all haters who wish i would give you the time of day. I'm hot and I know it so you all can bite me!

— Anonymous

No Pedro don't video me,i don't wont other men lookin at me.I may suck other men off behind your back but don't video me,no,no taco

— Anonymous

Typical Hispanic trash, that's why I never dated any Hispanics girls. My family wanted me to keep it brown but I went white, no hassles, drama, ugly nipples and tits that sag. One more year and this bitches is going to be a Ronald MacDonald's mascot.

— Anonymous

Guys shes Irish, that means in all probability shes sexually worse than an average English woman. Ergo, the chances for 'any' anal sex let alone decent anal sex are slim and none.

— Anonymous

Most if these women are extremely narcissistic; posting hundreds of photos of themselves on facebook, myspace, etc, believing that anyone really gives a damn about the next "duck face" photo that is posted on their wall. At the same time, they seriously act annoyed when they receive some of the negative attention that they solicit. These sites put these duck face idiots in their place, as far as I am concerned...

— Anonymous

she immediately reminds me of Jigsaw from the movie Saw. LOL The little clown on the tricycle.

— Anonymous

Reading Material

- The Day My Parents (and I) Found Out My Boobs Were on the Internet (<http://gawker.com/5935034/the-day-my-parents-and-i-found-out-my-boobs-were-on-the-internet>)
- Conservative Lawyers Target "Revenge Porn" Websites (<http://american3rdposition.com/?p=9094>)
- 'Revenge Porn' Site Sued for Privacy Invasion (<http://www.courthousenews.com/2012/12/06/52881.htm>)
- Revenge Porn Site PinkMeth.com Sued for \$1 Million (<http://www.xbiz.com/news/157338>)
- PinkMeth.com Facing Registry Lock, Attorney Says (<http://www.xbiz.com/news/157351>)
- Texas Judge Orders 'Indefinite' Lock on PinkMeth.com (<http://www.xbiz.com/news/157570>)
- More PinkMeth Sites Shut; Operator Plans to Continue Franchise (<http://www.xbiz.com/news/159505>)
- After 2 Sites Shut Down, PinkMeth Operators Open 3 More (<http://www.xbiz.com/news/159190>)
- Revenge Porn (<http://www.businessinsider.com/revenge-porn-2013-2>)
- Four Adult Sites And Their Respective Hosting Companies Named In FL Lawsuit (<http://www.ananova.com/four-adult-sites-and-their-respective-hosting-companies-named-in-fl-lawsuit/>)
- Pink Meth Crushed (<http://revengepornwar.blogspot.com/2013/05/pink-meth-crushed.html>)
- In The Real World, Revenge Porn Is Far Worse Than Making It Illegal (<http://talkingpointsmemo.com/cafe/our-current-law-is-completely-inadequate-for-dealing-with-revenge-porn>)

Bonnies to our Clydes

- DOXBIN (<http://doxbinzqkeoso6sl.onion>)

Contact

- pinkmeth@bitmessage.ch (<mailto:pinkmeth@bitmessage.ch>) (PGP (<https://pinkmethuylnenlz.onion.lt/pgp.txt>))

EXHIBIT “D”

PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS TO PINKMETH

Definitions

1. "Plaintiff" means Shelby Conklin.
2. "Defendant", "You" or "your" means Pinkmeth.com, his/her/its successors, predecessors, divisions, subsidiaries, present and former officers, agents, employees, and all other persons acting on behalf of Defendant or his/her/its successors, predecessors, divisions, and subsidiaries.
3. "Person" means any natural person, corporation, firm, association, partnership, joint venture, proprietorship, governmental body, or any other organization, business, or legal entity and all predecessors or successors in interest.

Requests for Admissions

1. Admit that you are a foreign partnership.
2. Admit that you conduct business in the State of Texas.
3. Admit that you do not have a registered agent, or other agent legally designated to accept service of written process, in Texas or any other state.
4. Admit that you do not have a principal place of business in Texas or any other state.
5. Admit that the address of your home office is PO Box 1954, Clarkston, MI 48347.
6. Admit that you published PO Box 1954, Clarkston, MI 48347 as your home office address.
7. Admit that you designated Kyle Bristow as your agent for service of removal requests from the Pinkmeth.com website.
8. Admit that Pinkmeth.com is a revenge pornography website.
9. Admit that Pinkmeth.com publishes pornographic photographs and videos of Texas residents on a website or website under its control.
10. Admit that the publications of those videos and photographs referenced in request number 9 above are published without the consent of those depicted therein.
11. Admit that you consent to the exercise of jurisdiction over you by the district courts of Denton County, Texas.
12. Admit that you broadcasted one or more nude photographs of Plaintiff on PinkMeth.com

13. Admit that you did not obtain these nude photographs from Plaintiff.
14. Admit that you solicited others to obtain nude photographs of Plaintiff without her consent.
15. Admit that you posted the nude photographs of Plaintiff without her consent.
16. Admit that the photographs of Plaintiff were broadcast solely for the sexual gratification of the operators and users of Pinkmeth.
17. Admit that, in addition to nude photographs of Plaintiff, you also posted her personal information to the Pinkmeth website.
18. Admit that you do not verify the age of any person depicted pornographically on the Pinkmeth website.
19. Admit that the pornographic depiction of Plaintiff on Pinkmeth.com intruded on her solitude, seclusion, or private affairs.
20. Admit that you publicized information about the Plaintiff's private life or knowingly allowed such information to be publicized anonymously using servers and computers under its control
21. Admit that the intrusion complained of in requests 19 and 20 above would be highly offensive to a reasonable person.
22. Admit that pornographic pictures of Plaintiff are not matters of legitimate public concern.
23. Admit that you acted with actual malice toward Plaintiff in publishing pornographic pictures of her on your website.
24. Admit that you hired The TOR Project Inc. ("TOR") to assist you with the publication of your website.
25. Admit that you hired TOR for the express purpose of escaping liability for posting pornographic photographs of others without their consent.
26. Admit that Plaintiff has been damaged as a result of the posting of pornographic images of her on the Pinkmeth website.
27. Admit that, if now paid in cash, the amount of \$1,000,000.00 would fairly and adequately compensate Plaintiff for the mental anguish and loss of earning capacity she has suffered as a direct result of Pinkmeth's illegal posting of pornographic images depicting Plaintiff.
28. Plaintiff has and will continue to be damaged by unauthorized access by Pinkmeth to her personal information, the posting of nude photographs of her on the PinkMeth.com and

pinkmethuynenlz.onion.lt website, and TOR's continued tolerance and endorsement of Pinkmeth's presence on the Internet.

29. Admit that the posting of the photographs referenced in paragraphs 1 – 28 above constitutes the illegal distribution of pornography in violation of federal law and improper photography in violation of Texas law.
30. Admit that, aside from the issuance of injunctive relief, Plaintiff has no adequate remedy at law for the injuries and losses which she is incurring as a result of Pinkmeth's conduct.

Respectfully submitted,

THE VAN DYKE LAW FIRM PLLC

/s/ Jason Lee Van Dyke

Jason L. Van Dyke

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