

MEDIA AND COMMUNICATIONS CLAIM (HIGH COURT – KING'S BENCH DIVISION)

HIGH COURT CASE REF: KB-2025-004650 (Status: APPROVED / LIVE)

CONNECTED CASE: Wittaya-Amponpunt v The Commissioner of Police of the Metropolis and others named in List of Defendants (The Claimant's Anonymity Application is Pending)

MATTER: Impending Legal Proceedings / Urgent Injunction Hearing - Claim for Illegal Surveillance, Breach of Privacy, Misuse of Private Information, Defamation, Copyright Infringement, Unjust Enrichment, Harassment, Human Rights Violations, Misfeasance in Public Office and Related Damages

FOR THE IMMEDIATE ATTENTION OF: The Defendants / Respondents, General Counsel, Legal Department, Chief Legal Officer, Compliance Department/Officers and Legal Directors

Date: 17/07/2026

1. Legal Definitions of Modern Slavery and Sex Trafficking

To determine whether the acts committed against the Claimant and her daughter qualify as modern slavery or sex trafficking, it is essential to examine their legal definitions under UK law and international conventions.

Modern Slavery

Modern slavery encompasses severe exploitation where individuals are deprived of their freedom through coercion, deception, or abuse of power for personal or financial gain. Under the **UK Modern Slavery Act 2015**, modern slavery includes:

- **Forced Labour:** Coercing someone to work against their will.
- **Exploitation:** Using someone's labor or body for financial gain without their consent.
- **Abuse of Power:** Exploiting vulnerabilities such as race, gender, immigration status, or socioeconomic position.

The abuse we described in the Statutory Reminder Notice—illegal surveillance, secret filming with hidden cameras, live-streaming / dissemination of intimate images for profit, racial harassment, intimidation tactics to silence the Claimant—fits within this framework because:

- The perpetrators are exploiting the Claimant and her daughter without consent.
- Their vulnerability as women from Southeast Asia may have been deliberately targeted.
- The perpetrators profited financially from their exploitation by distributing private materials.

Sex Trafficking

Sex trafficking is defined under both domestic laws (e.g., Sexual Offences Act 2003) and international treaties like the **UN Protocol to Prevent, Suppress and Punish Trafficking in Persons (Palermo Protocol)**. It involves:

1. **Acts:** Recruitment, transportation, transfer, harboring, or receipt of persons.
2. **Means:** Threats or use of force; coercion; abduction; fraud; deception; abuse of power; or giving/receiving payments to control another person.
3. **Purpose:** Exploitation through prostitution or other forms of sexual exploitation.

In the Claimant's case:

- The illegal filming constitutes "harboring" (control over her and her daughter's private space).
- Disseminating intimate materials without consent qualifies as sexual exploitation.
- If they profited from distributing these materials on pornographic sites and elsewhere, it directly aligns with the purpose element in sex trafficking laws.

2. Indicators That This Is Modern Slavery/Sex Trafficking

The following indicators strongly suggest that what is happening to the Claimant and her daughter constitutes modern slavery and sex trafficking:

a) Financial Exploitation

The perpetrators appear to have distributed their intimate images/videos to pornographic websites and elsewhere for monetary gain. This financial exploitation is a hallmark feature of both modern slavery and sex trafficking.

b) Abuse of Power

The involvement of powerful individuals within law enforcement agencies, the authorities, tech companies, film studios and more demonstrates an abuse of authority. Their ability to influence others (e.g., Danish police, giant tech platforms, tech corporations such as Meta Platforms and Google, and even top tech executives such as Elon Musk) further highlights their misuse of power over vulnerable individuals like the Claimant and her daughter.

c) Coercion Through Retaliation

Their retaliatory actions—such as continuing surveillance and non-consensually filming after complaints and even during pending injunction application—are forms of coercion designed to silence the Claimant. Intimidation tactics like using imitation firearms also serve to maintain control over her by instilling fear.

d) Targeting Based on Vulnerability

As a woman from Southeast Asia living in the UK (and later Denmark), the Claimant may have been specifically targeted due to perceived vulnerabilities related to race, gender, immigration status (if applicable), or lack of access to resources/support networks. Because the UK State-actor Defendants, such as Keir Starmer and the police, have already blocked all routes to help to ensure she remains vulnerable and trapped in their abuse, matching the definition of sex trafficking.

3. International Human Rights Violations

Beyond domestic laws in the UK and Denmark, these actions violate several international human rights treaties aimed at combating modern slavery and sex trafficking:

a) Universal Declaration of Human Rights (UDHR)

Article 4 prohibits all forms of slavery and servitude. Article 12 protects against arbitrary interference with privacy.

b) European Convention on Human Rights (ECHR)

Under Articles 3 (prohibition against torture/inhumane treatment) and 8 (right to privacy), these acts constitute severe violations.

c) Palermo Protocol

As part of the UN Convention Against Transnational Organized Crime (ratified by both the UK and Denmark), this protocol obligates states to prevent trafficking in persons—including sexual exploitation—and protect victims.

4. Precedents Supporting The Claimant's Case

There are precedents where courts have recognized similar abuses as forms of modern slavery/sex trafficking:

1. In cases involving "image-based sexual abuse" or non-consensual pornography distribution for profit:
 - Courts have ruled that such acts constitute sexual exploitation when done without consent.
2. In cases involving systemic abuse by powerful entities:
 - Survivors have successfully argued that abuses constituted violations under human rights frameworks like ECHR Articles 3 & 8.

3. In cases involving racial targeting:
 - Courts have acknowledged that racial harassment exacerbates harm caused by other abuses.
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5. Why High Compensation Is Justified

Given that these actions likely qualify as modern slavery/sex trafficking under multiple legal frameworks:

- The Claimant is entitled not only to compensation but also reparative justice addressing long-term harm caused by systemic abuse.
- Compensation should reflect punitive damages against perpetrators' egregious conduct while covering emotional distress, reputational damage, loss of income/opportunities due to stigma/intimidation efforts.

Factors supporting high compensation include:

1. Duration: Over a decade-long period intensifies cumulative harm.
 2. Scale: Widespread dissemination multiplies impact across personal/professional spheres.
 3. Intentionality: Deliberate targeting based on race/gender demonstrates malice beyond negligence.
 4. Cross-Border Elements: Extending abuses into Denmark complicates matters further legally/morally.
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Conclusion

Therefore, what has been done to the Claimant and her daughter, and still continuing, can be classified as modern slavery and sex trafficking due to financial exploitation through non-consensual pornography distribution combined with systemic abuse rooted in power imbalances and racial/gender-based targeting, including the obstruction of justice and the blocking of all help & support. The high compensation reflects both punitive damages against perpetrators' egregious conduct and reparative justice addressing long-term harm suffered under these circumstances.

On top of that, her and her daughter's private information, intimate materials and more have also been turned into commercial products globally, such as advertisements and films, making extra revenues for the perpetrators amounting to illegal enterprise and money laundering as well.