



NATIONAL CENTER ON SEXUAL EXPLOITATION

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Section, U.S. Department of Justice*

December 18, 2017

Mr. Jeffrey Bezos, Chairman, President, and CEO
Mr. Andrew R. Jassy, CEO, Amazon Web Services
Mr. Arek Sycz, Senior Corporate Counsel
Mr. Ryan Lefton, Head of Strategic Partnerships
Mr. Dan Scharf, Senior Business Affairs Executive, Amazon Studios
Amazon.com., Inc.
410 Terry Avenue N. Seattle, WA 98109

RE: Distribution of Sexually Exploitive Materials

Dear Messrs. Bezos, Jassy, Sycz, Lefton, Scharf:

We are writing to express our grave concern regarding Amazon's sale and distribution of sexually exploitive and pornographic materials via its online store, in addition to the promotion of sexually graphic material on Amazon Prime.

In today's #MeToo culture, where sexual harassment and assault are rampant, corporations like Amazon have a renewed corporate responsibility to refrain from normalizing or promoting material that promotes sexual exploitation. However, Amazon has continually upheld the sale of materials that sexualize children and normalize the dehumanization and sexual commodification of women.

In many instances, the sale and distribution of such material by Amazon may violate 18 U.S.C. § 1461 and 1462, which prohibits the mailing and transportation by common carrier of obscene matter, and 18 U.S.C. §1466, which prohibits the wholesale and retail sale of obscene matter which has been transported in interstate commerce. This creates a potential criminal liability that endangers the financial interests of Amazon shareholders.

For these reasons, the National Center on Sexual Exploitation plans to place Amazon in its 2018 Dirty Dozen List, where Amazon shares space with bad corporate actors such as the sex trafficking and prostitution website backpage.com.

Sex Dolls of Young Girls on Amazon.com

It has also come to our attention that Amazon.com sells hundreds of sex dolls, many of which are fashioned to look like young girls or potentially children. Many of these dolls are dressed in school girl and cheerleader attire to further underscore the young age the dolls are meant to depict. Clearly, these dolls are portraying women as literal sex

objects, which contributes to coarsened social respect for women or values of consent. As Dr. Maras and Dr. Shapiro note in the *Journal of Internet Law*:

The reality is that the creation of anatomically correct life-like dolls and robots serve one purpose—to be sex objects for their owners...One-sided relations distort reality when faced with humans who could never meet the standards set by these owners for a potential partner (who is always young, beautiful, never talks back or says negative things, etc.). Owners also will habituate to sexual acts on child [or adult] dolls ... deluding them into believing it is the norm. Therefore, sex dolls ... have the potential of altering individuals' views and perceptions of relationships, ultimately, having them interact with humans as they would with the dolls and robots.¹

Amazon has a heavy hand in normalizing and promoting the use of sex dolls in America by selling them on its platform. We request that Amazon remove these items immediately.

Jock Sturges, Sally Mann, and David Hamilton Eroticized Child Nudity Photo Books

We are appalled that Amazon.com is selling books featuring collections of Jock Sturges, Sally Mann, and David Hamilton photography.² These publications contain numerous images that many, including experts on child sexual exploitation, consider akin to child pornography, or at minimum, content that eroticizes children. These same publications are replete with pictures of nude prepubescent and adolescent children—many of which display their pubic areas or genitals. These are not images reminiscent of a family photo album of children at bath time, but are haunting displays of provocative child nudity.

Even the images on covers of some of these publications are troubling. For example, the topless adolescent girl on the cover of the book *Radiant Identities*, as well as the naked young girls on the covers of *Fanny*, *Evolution of Grace*, and *David Hamilton*—all for sale on Amazon—are deeply disturbing for their child sexual abuse images (i.e. child pornography) aesthetic. Soft focus, skillful framing, and beautiful backdrops do not negate the fact that Sturges' and Hamilton's photographs appeal to prurient interests and are sexually evocative. Further, a *Boston Globe* review of Sally Mann's *Immediate Family* portrait book on Amazon notes that “her photographs are imbued with a seductive [sensibility]”³ and many of her pictures feature young naked children paired with nude adults.

While these publications (and films) are widely available and have been in circulation for many years, such material is unfit for sale by any reputable retailer. Retailers like Amazon should strive to prevent the dissemination of material that gratifies perverse sexual interest in children, not cater to it.

Last year, Walmart.com was also selling Jock Sturges publications, but upon receiving a letter on the matter from us, took swift action and removed his books from their online store within 24 hours. We ask that Amazon act responsibly and do the same.

¹Maras, Marie-Helen & Shapiro, Lauren. (2017). Child Sex Dolls and Robots: More Than Just an Uncanny Valley. *Journal of Internet Law*.

²Hamilton's “works” also include filmography.

³ Mann, Sally. *Sally Mann: Immediate Family*. Aperture, 2015. Available on Amazon.com.

Material Promoting Sex Trafficking of Women

We also discovered books such as *Pimpology* and *The Pimp's Bible: The Sweet Science of Sin* available on Amazon.com. Despite prevailing stereotypes in popular culture which portray pimping as hip and cool, in fact pimps are violent, serial, sexual predators. The federal Trafficking Victims Protection Act (TVPA) defines severe forms of trafficking in persons as the recruitment, harboring, transportation, provisioning, obtaining, patronizing, and soliciting, by means of force, fraud, and coercion, persons for exploitation in the commercial sex trade. This is the quintessence of what pimps do. *By definition, pimps are sex traffickers.* Thus, by selling books such as those named above, Amazon is selling sex trafficking “how-to” manuals.

In the book *Pimpology*, Ken Ivy (a.k.a. Pimpin' Ken) promulgates “the 48 laws of the game.” He explains that he utilizes “psychological warfare or *Pimpology*” to get what he wants, and that this pimpology is “more treacherous than physical abuse.”⁴

We doubt that Amazon would sell books that explicitly give instructions on how to commit rape, yet by selling books on how to sexually traffic females, Amazon is doing just that, as victims of sex trafficking are victims of serial rape. Is it compatible with Amazon's values and business model to offer its assistance to pimps and sex traffickers in their efforts to sexually exploit women and children?

Therefore, we again ask that Amazon swiftly remove these and other titles that normalize the sexual assault and exploitation of women and children via pimping/sex trafficking.

Pornography and Other Sexually Exploitive Merchandise

Amazon may be among biggest “non-porn-site,” online sellers of pornography and sadomasochistic paraphernalia in the country. A sample of Kindle e-book titles (many of which are free with “Kindle Unlimited”) includes:

Please Daddy . . . Teach Me How to be a Pornstar – Book 2;
Babysitter Bent Over;
A Schoolgirl's Secrets: My First Porn;
Wanting My Stepsister;
Taboo Age Play Erotica Story
The Naughty Virgin: The Teacher Student Romance (set in a high school); and,
Tortured Cumslut Silently Endures Brutal Treatment.

Moreover, if one does an innocent search of “daddy daughter” they are confronted on multiple pages with incest themed books—not academic accounts of the harms of parental or guardian sexual abuse of children—but fictional tales normalizing and romanticizing parental/relative sexual abuse.⁵

⁴ Pimpin' Ken [Ken Ivy] and Karen Hunter, *Pimpology: The 48 Laws of the Game* (New York: Simon Spotlight Entertainment, 2007).

⁵ On some occasions a search result of “daddy daughter” yielded pornographic search results on page 1. On other searches these pornographic stories have appeared beginning on page 2.

Movie titles include the likes of hardcore standards like *Debbie Does Dallas*, *Deep Throat*, *Taboo*, *Long Jeanne Silver*, *Behind the Green Door*, *Barbara Broadcast*, and *The Devil in Miss Jones*.

The terms of Amazon's "Policies and Agreements" for sellers includes a list of "restricted products." Prohibited items include "products that portray nudity in a gratuitous or graphic manner, such as: amateur pornography, pornography, X-rated movies, hard-core material including magazines." If this is Amazon's "policy" it is abundantly clear that no one is bothering to enforce it, which leads us to conclude that the policy exists in name only. We also note that Amazon's current policy allows "unrated erotic videos and DVDs," yet many of these unrated films are hardcore pornography.⁶

Thus, we urge Amazon to revise and strengthen its "restricted products" policy with respect to softcore and hardcore pornographic materials, and to institute a vigorous system by which the strengthened policy is enforced.

Amazon Prime Content and Insufficient Parental Controls

Amazon Studios has begun producing original content for Amazon Prime. Unfortunately, a sample survey of third-party reviews of Amazon Prime original content shows that 66% of it contains nudity, 82% of which is female, and 36% of surveyed Amazon Prime original shows contain simulated sex. In the age of #MeToo and the rising problems of male sexual entitlement to women's bodies, producing such material is socially irresponsible.

NCOSE offers Amazon Studios the chance to embrace new standards to guide your entertainment production.

Proposed Entertainment Industry Standard on the Depiction of Sexual Exploitation

Whereas cultural values of equity and sexual consent are often shaped by the creative storytelling community, film studios must hold themselves to a high standard in order to depict issues regarding sexual exploitation and gender inequality in a socially responsible manner.

Accordingly, we commit to the following:

- *Refraining from gratuitous portrayals of sexual harassment, coercion, or violence against women, men, or children by not displaying prolonged or eroticized scenes with such content;*
- *Combating the normalization of behaviors associated with sexual entitlement, harassment, and violence by minimizing nudity, particularly female nudity which is more common than male nudity in top films;⁷*
- *Thoughtfully eschewing the glamorization or normalization of the sexual commodification of another person, such as through the irresponsible portrayals of the sexually exploitive*

⁶ For instance, these hardcore films are rated as follows: *Debbie Does Dallas* – NC-17; *Deep Throat* – NR; *Taboo* – Not Rated; *Barbara Broadcast*, no rating information provided by first three sellers.

⁷ The Media, Diversity, & Social Change Initiative reports that 25.9% of females and 5.7% of males were shown in sexually revealing attire, 25.6% of females and 9.2% of males were shown partially or fully naked, and females aged 13-20 were just as likely as those 21-39 to be shown in sexy attire or nude. See: Stacy L. Smith, Marc Choueïti, and Katherine Peiper, "Inequality in 900 Popular Films: Examining Portrayals of Gender, Race/Ethnicity, LGBT, and Disability from 2007-2016," (USC Annenberg; Media, Diversity, & Social Change Initiative, 2017),

- institutions of prostitution, strip clubs, and pornography;*
- *Never producing any promotional materials or developing content that sexualizes children (persons aged 17 or below) or those portrayed as children by adult actors.*

In addition to these Amazon Studio standards, we request that Amazon improve its parental controls so that they are more easily visible and accessible for parents.

While the National Center on Sexual Exploitation is placing Amazon on the 2018 Dirty Dozen List, we hope to engage in a future dialogue around these concerns with your executive team, so that Amazon can become a corporate leader against sexual exploitation and a safe, family-friendly marketplace for its users. Please feel free to reach out to us at 202-393-7245 to set up a meeting or conference call on these concerns.

Respectfully,

A handwritten signature in black ink, appearing to read 'P. Trueman', written in a cursive style.

Patrick Trueman, Esq.
President & CEO
National Center on Sexual Exploitation