Steve Huffman Co-Founder and CEO Reddit 420 Taylor Street San Francisco, CA 94102

RE: Facilitation of Image-based Sexual Abuse

Mr. Huffman:

We the undersigned international anti-sexual exploitation and violence experts, as well as child safety advocates, from _____ countries are writing to demand that your corporation stop facilitating Image-based Sexual Abuse.

Image-based Sexual Abuse (IBSA) is the creation, theft, extortion, threatened or actual distribution, or any use of sexualized or sexually explicit materials without the meaningful consent of the person depicted. Often, IBSA includes the use of sexually explicit or sexualized materials to groom or extort a person, or to advertise commercial sexual abuse. This umbrella term encompasses several iterations of sexual exploitation, including but not limited to recorded rape or sex trafficking, non-consensually shared/recorded sexually explicit content (sometimes called "revenge porn"), the creation of photoshopped/artificial pornography (including nonconsensual "deepfake" porn), and more.

Your corporation has failed to prevent Image-based Sexual Abuse from festering across your platform and has failed to prioritize survivor-centered reporting and response mechanisms. Given the seriousness of the IBSA-based trauma that your corporation continues to facilitate—we call on you to address these shortcomings immediately, and to meet with experts and survivors to build solutions and prevent further abuse.

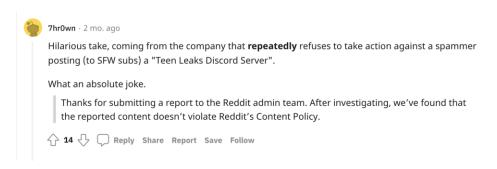
Reddit Is Facilitating Image-based Sexual Abuse:

We recognize that Reddit has published an updated policy in March 2022 entitled "Evolving our Rule on Non-Consensual Intimate Media Sharing."¹ While this is a step forward, Reddit's long history of effectively allowing such content to flourish on its platform and failures to moderate sexually exploitive content causes us concern that this policy will be poorly enforced.

Reddit users have commented on the public post about the policy update, noting that the reporting mechanisms are largely ignored by moderators—and an admin has confirmed that the report flow is not undergoing any changes.²



In the same thread, Reddit users have commented on the policy update noting the existence of regular posts sharing "leaked" explicit materials of "teens" and Reddit has claimed the content does not violate its policy.



The premise that Reddit's existing report flows and processes for identifying IBSA are sufficient is inherently flawed.

¹ "Never Post Intimate or Sexually Explicit Media of Someone Without Their Consent" *Reddit*, 2022, https://www.reddithelp.com/hc/en-us/articles/360043513411

² "Evolving our Rule on Non-Consensual Intimate Media Sharing" Reddit, 2022,

https://www.reddit.com/r/redditsecurity/comments/t8zloo/evolving_our_rule_on_nonconsensual_intimate_media/

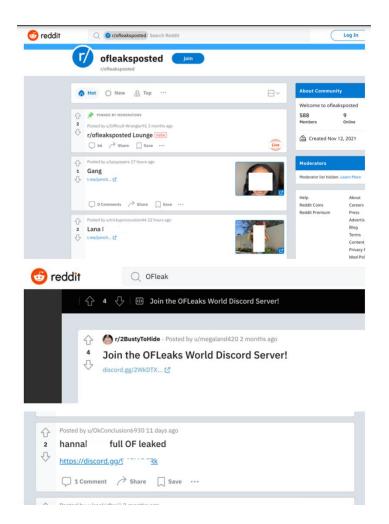
Reddit has no meaningful age or consent verification for sexually explicit or suggestive content. In fact, no sufficient verification metrics exist, even within the pornography industry itself. Pornography platforms have consistently failed to prevent image-based sexual abuse from being uploaded to their platforms, including recorded rape, non-consensually shared materials, and even cases of women being sex trafficked into pornography production such as in the GirlsDoPorn case in the United States,³ and similar cases in France,⁴ the Czech Republic,⁵ and more.

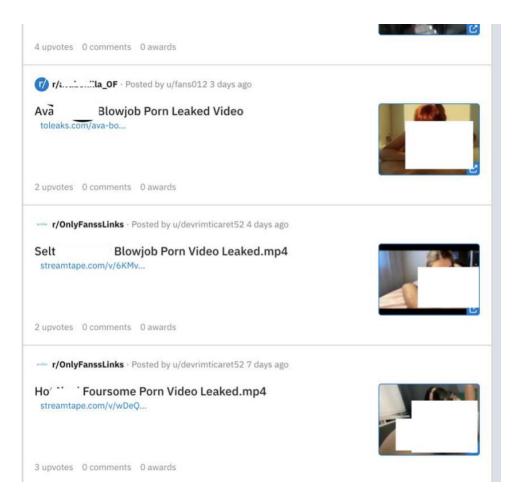
And so, on Reddit too, proof abounds of posts and entire subreddits with high markers for nonconsensual image trading or selling

³ Hassan, Adeel; Van Syckle, Katie "Porn Producers Accused of Fooling Women Get Sex Trafficking Charges: Young women say that they responded to ads seeking models and were tricked into performing," *The New York Times*, October 11, 2019, <u>https://www.nytimes.com/2019/10/11/us/porn-sex-trafficking.html</u>.

⁴ Vantighem, Vincent, "Jacquie et Michel : Le parquet de Paris ouvre une enquête pour viols et proxénétisme" 20 *Minutes*, October 9 2020 https://www.20minutes.fr/justice/2858767-20200910-jacquie-michel-parquet-paris-ouvre-enquete-viols-proxenetisme

⁵ Cole, Samantha, et al. "'Frankenstein's Monster:' Images of Sexual Abuse Are Fueling Algorithmic Porn" *Vice*, November 2020 https://www.vice.com/en/article/akdgnp/sexual-abuse-fueling-ai-porn-deepfake-czech-casting-girls-do-porn





Further, Reddit appears to ignore child survivors of sexual exploitation who ask for nonconsensual materials to be removed.

In 2020, NCOSE assisted a survivor who was a minor at the time of her sexual abuse and had scores of abuse images uploaded and disseminated on the Internet. These images are Child Sexual Abuse Material (CSAM, also known as child pornography) which is contraband in the United States of America, meaning it is illegal under federal law to house, possess, or distribute it, including on the Internet. One of the websites the CSAM was uploaded to was Reddit. There were at least 28 unique URLs depicting this survivor's abuse on Reddit. On December 18, 2020, NCOSE's Law Center sent a takedown request on behalf of the survivor to you, your Legal Department, as well as to Reddit's information, contact, and help desk email addresses. Several months later, the NCOSE Law Center still had not received a response or

acknowledgement from Reddit despite being informed of the very serious federal crimes occurring on your website.

Eventually, NCOSE lawyers received a notice from Reddit stating that you no longer monitored <u>contact@reddit.com</u> or <u>support@reddit.com</u>, which prompted them to then fill out a Customer Support Ticket on your website. After a convoluted process, NCOSE lawyers submitted the ticket once again explaining the very serious exploitation and abuse of the NCOSE client and the federal crimes occurring on their website. The NCOSE Law Center received an automated email stating that Reddit would look into the situation and investigate further if any action was necessary. **Over a year after the initial takedown request, NCOSE still does not have confirmation that the content was removed.**

The Harms of Image-based Sexual Abuse (IBSA):

While the term Image-based Sexual Abuse has arisen in recent years, it describes a phenomenon that has been long-plaguing vulnerable populations, particularly women and LGBT+ communities.

Prevalence of IBSA:

- A 2017 U.S. survey conducted on Facebook found that of the 3,044 participants 1 in 8 had been targets of the distribution, or threat of distribution, of sexually graphic images of individuals without their consent. Women were significantly more likely (about 1.7 times as likely) to have been targets of this abuse compared to men.⁶
- A 2021 representative survey of 2,000 people between the ages of 18 and 80 from all European Union (EU) countries found that 30% of women across the EU fear that sexual images of themselves, real or fake, may be shared without their consent online.⁷

⁶ Eaton, Asia; Jacobs, Holly, and Ruvalcaba, Yanet "2017 Nationwide Online Study of Non-Consensual Porn Victimization and Perpetration: A Summary Report," *Cyber Civil Rights Initiative Inc*, 2017, https://cybercivilrights.org/wp-content/uploads/2017/06/CCRI-2017-Research-Report.pdf

⁷ "Boundless hate on the internet – Dramatic situation across Europe," *HateAid*, 2021, https://hateaid.org/wp-content/uploads/2021/11/HateAid-Report-2021_EN.pdf

- LGBTQ+ people are at higher risk for image-based abuse than heterosexual people, with 17% of LGBTQ+ internet users reporting that they have been threatened or actually had pictures posted of them.⁸
- A survey of young adults (ages 18-25) who had experienced sextortion found that approximately 40% of participants reported that their sextortion occurred online. The report notes: "In these cases, the perpetrator frequently sought to get more sexual images of the victim or meet in person for sexual contact. . . . While threats for explicit imagery were the most common demands across the sample, younger participants were more likely than older participants to have experienced this."⁹
- An Australian survey found that 1 in 10 women reported being a victim of "downblousing" and 1 in 20 women reported being a victim of "upskirting."¹⁰
- In South Korea where video voyeurism has been noted as an epidemic, according to the country's Supreme Prosecutors' Office Annual Report, as cited in this analysis, there have been over 6,000 spycam voyeurism legal cases each year between 2014 to 2017. These legal cases are certainly a fraction of the instances of abuse that often go unreported.¹¹

The Cyber Civil Rights Initiative conducted an online survey regarding non-consensual distribution of sexually explicit photos in 2017. The survey found that compared to people without IBSA victimization, victims had "significantly worse mental health outcomes and higher levels of physiological problems."¹² A previous analysis noted that such distress can include high levels of anxiety, PTSD, depression, feelings of shame and humiliation, as well as loss of trust

⁸ Lenhart, A., Ybarra, M., & Price-Feeney, M. "Nonconsensual image sharing: One in 25 Americans has been a victim of 'revenge porn'." *Data & Society Research Institute*, 2016

https://datasociety.net/pubs/oh/Nonconsensual_Image_Sharing_2016.pdf

⁹ "Sextortion Summary findings from a 2017 Survey of 2,097 Survivors," *Thorn*, 2017, https://www.thorn.org/wp-content/uploads/2019/12/Sextortion_Wave2Report_121919.pdf

¹⁰ Henry, Nicola; Flynn, Asher; and Powell, Anastasia, "Responding to 'Revenge Pornography': Prevalence, Nature and Impacts, Report to the Criminology Research Advisory Council" *Government of Australia*, March 2019, https://www.aic.gov.au/crg/reports/crg-0815-16

 ¹¹ Teshome, Birru Dereje, "Spy Camera Epidemic in Korea: A Situational Analysis," *Asian Journal of Sociological Research*, 2019 (accessed April 19, 2022)https://globalpresshub.com/index.php/AJSR/article/view/782/727
¹² Eaton, Asia; Jacobs, Holly, and Ruvalcaba, Yanet, Ibid

and sexual agency.¹³ The risk of suicide is also a very real issue for victims and there are many tragic stories of young people taking their own lives as a result of this type of online abuse. An informal survey showed that 51% of responding victims reported having contemplated suicide as a result of their IBSA experience.¹⁴

A study that interviewed 75 survivors of various forms of IBSA from the UK, Australia and New Zealand reported survivor statements about the broader impact on their lives. Participants described feeling "completely, completely broken" and described their experiences as "life-ruining," "hell on earth," and "a nightmare . . . which destroyed everything."¹⁵

In addition to having sexually explicit images posted online, victims of IBSA often also face the ordeal of having their personal information shared alongside these images. An informal survey of survivors of IBSA found that survivors often had their full name published alongside the explicit imagery (59%), or their social media/network information (49%), email (26%), phone number (20%), physical home address (16%) or work address (14%).¹⁶

Unfortunately, while laws do exist in some countries to counter this form of abuse, when victims report the abuse to authorities (police) they are often dismissed, blamed or worse, ridiculed.¹⁷ Like much of the violence perpetrated against women and other marginalized people, there is a societal trend to blame the victim. This is a particular issue in adult self-generated intimate sexual images, where often the person (usually a female), who is pressured by another (usually by a male), to take and send intimate sexual images is deemed at fault for doing so.

Reddit Can Become Part of the Solution:

¹³ Bates, Samantha, "Revenge Porn and Mental Health: A Qualitative Analysis of the Mental Health Effects of Revenge Porn on Female Survivors," *Feminist Criminology*, 2017 https://doi.org/10.1177/1557085116654565

¹⁴ "Revenge Porn Statistics" *The Cyber Civil Rights Initiative*, 2014, https://www.cybercivilrights.org/wp-content/uploads/2014/12/RPStatistics.pdf

¹⁵ McGlynn, Clare; Johnson, Kelly; Rackley, Erika; Henry, Nicola; Gavey, Nicola; Flynn, Asher; Powel, Anastasia, "'It's Torture for the Soul': The Harms of Image-Based Sexual Abuse," *Social & Legal Studies*, 2021, https://doi.org/10.1177/0964663920947791

¹⁶ The Cyber Civil Rights Initiative, Ibid

¹⁷ Sparks, Brandon, "A Snapshot of Image-Based Sexual Abuse (IBSA): Narrating a Way Forward," *Sexuality Research and Social Policy*, 2022, https://doi.org/10.1007/s13178-021-00585-8

We write to request that Reddit make the following improvements:

- Adopt strong policies against hardcore pornography and sexually explicit content, due to the inability for Reddit to ever sufficiently verify the age or consent of people depicted in such content,
- Institute proactive moderation and filtering solutions to enforce such a policy,
- Work with NCOSE and survivors to implement survivor-centered practices and reporting mechanisms specific to image-based sexual abuse (for example, immediate removal across the platform when content is reported),
- Ban users who upload sexually explicit material, especially if the material depicts child sexual abuse material or non-consensually shared intimate images, and prevent them from creating another account,
- Create prominent, simple, and lock-able caregiver controls and block the ability for adults to message minors.

Time is up for ignoring image-based sexual abuse—you must take action. You can contact the National Center on Sexual Exploitation at public@ncose.com in order to meet with survivors and international subject matter experts on these issues.

Sincerely,