

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 319 international anti-sexual exploitation and violence experts, as well as child safety advocates, from 31 countries are writing to demand that your corporation stop facilitating Image-based Sexual Abuse.

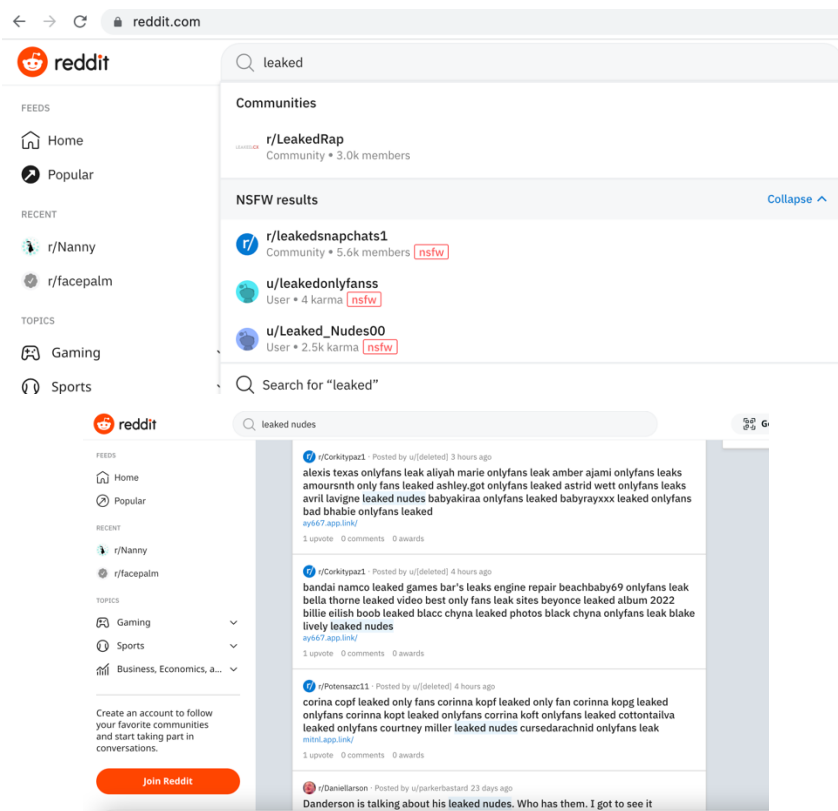
Image-based Sexual Abuse (IBSA) is the creation, theft, extortion, threatened or actual distribution, or any use of sexualized or sexually explicit materials without the meaningful consent of the person depicted. Often, IBSA includes the use of sexually explicit or sexualized materials to groom or extort 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:

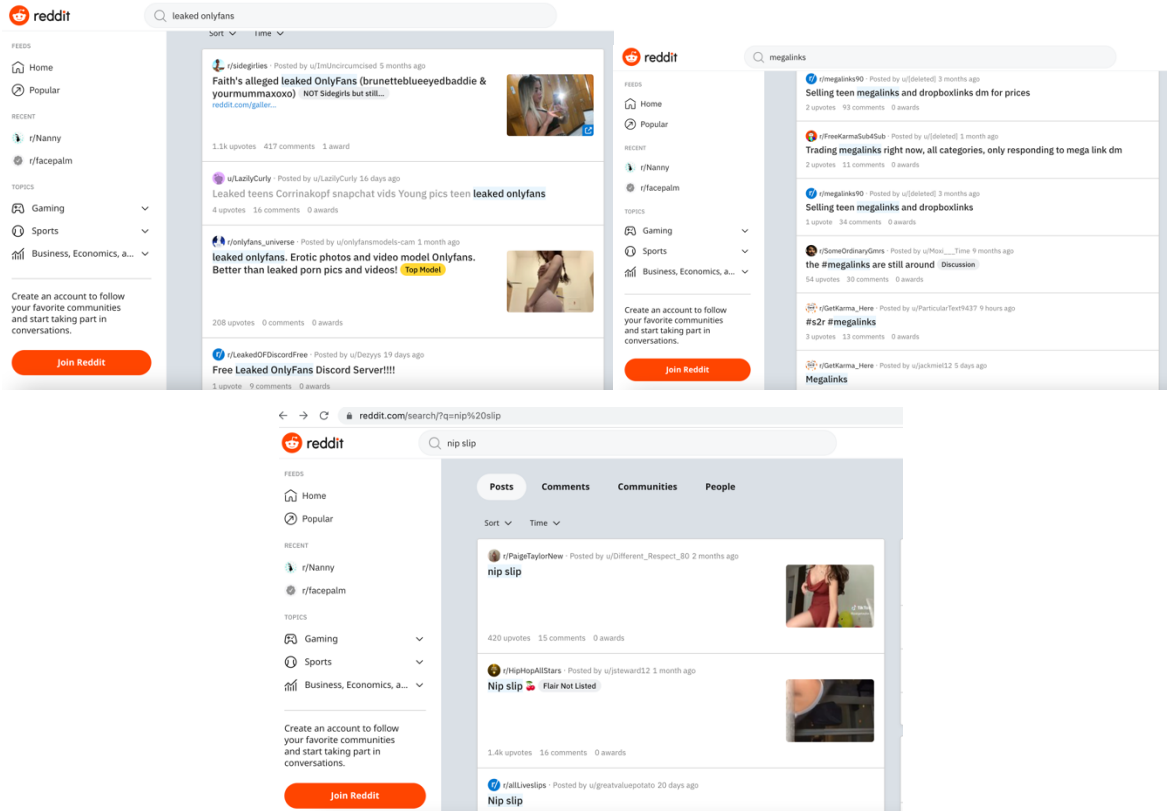
We recognize that Reddit has published an updated policy in March 2022 entitled “Evolving our Rule on Non-Consensual Intimate Media Sharing”¹ and has spoken about hashing initiatives to remove reported cases of IBSA.² While these are steps forward, Reddit’s failure to enact meaningful age and consent verification practices and ineffective moderation strategy continues to allow such content to flourish on its platform.

On April 13th, 2023, within 3 seconds of searching NCOSE researchers were able to find posts and threads with high indicators of adult image based sexual abuse, such as “leaked” content, trading of encrypted links indicating addition trading/selling of IBSA, and other posts violating Reddit’s policies.

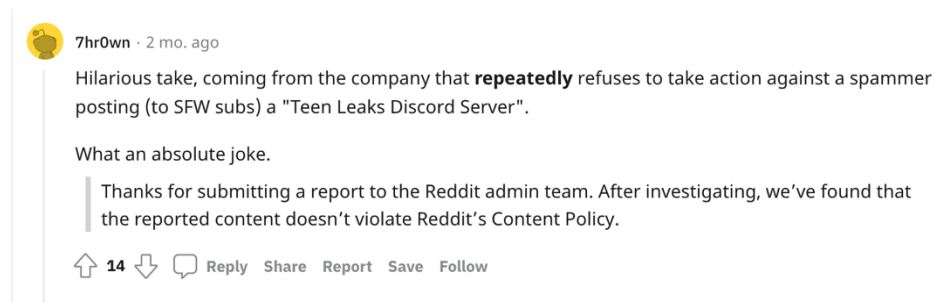


¹ “Never Post Intimate or Sexually Explicit Media of Someone Without Their Consent” *Reddit*, 2022, <https://www.reddithelp.com/hc/en-us/articles/360043513411>

² “Reddit cracked down on revenge porn, creepshots with twofold spike in permabans” *Ars Technica*, 2023, <https://arstechnica.com/tech-policy/2023/03/reddit-cracked-down-on-revenge-porn-creepshots-with-2-fold-spike-in-permabans/>



In 2022, Reddit users 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.

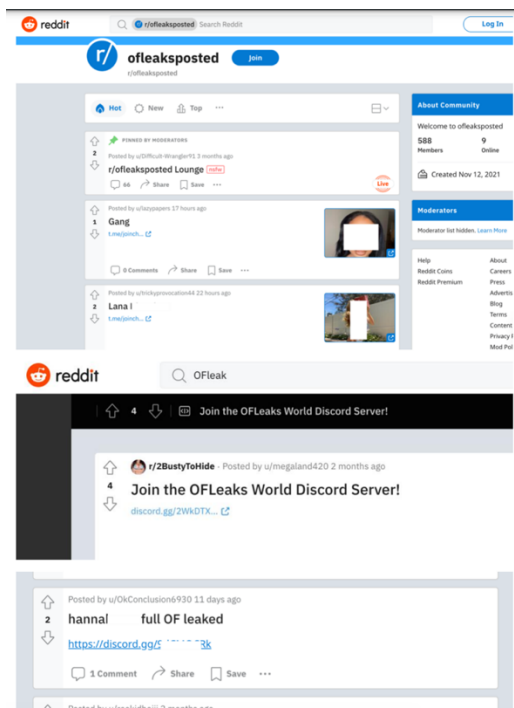


The premise that Reddit’s existing report flows and processes for identifying IBSA are sufficient is inherently flawed.

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.

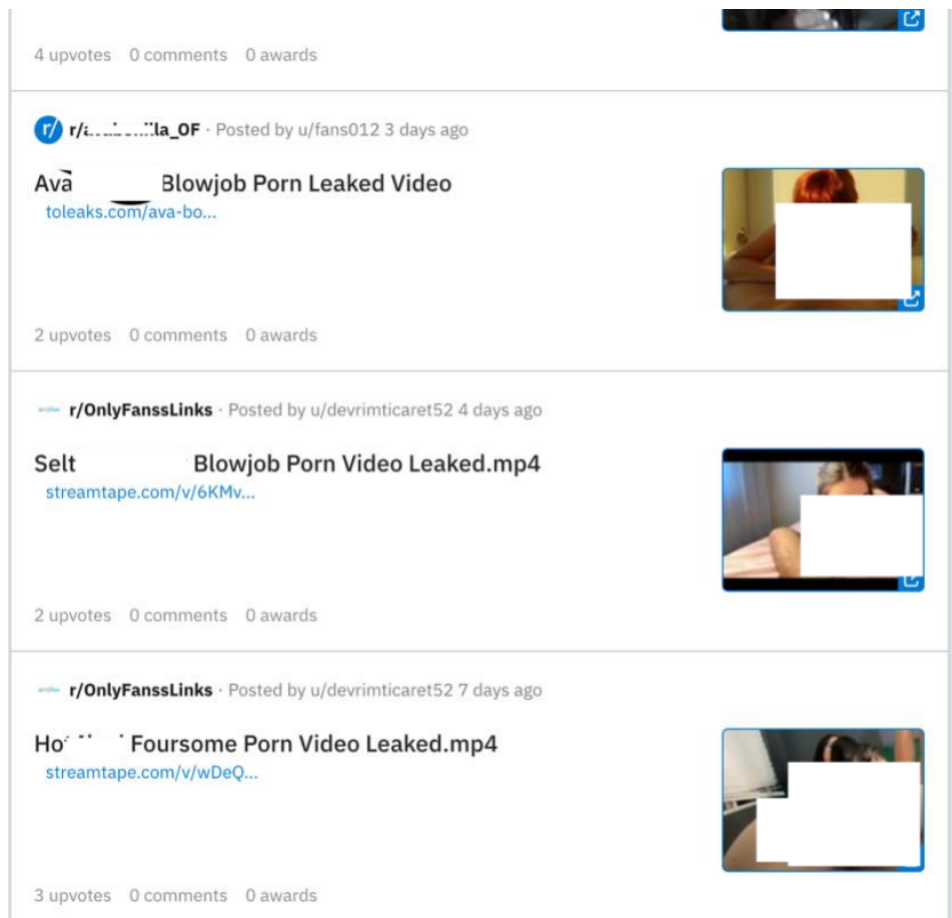
And so, on Reddit too, proof abounds of posts and entire subreddits with high markers for non-consensual image trading or selling.



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, <https://www.nytimes.com/2019/10/11/us/porn-sex-trafficking.html>.

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 non-consensual 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 contact@reddit.com or support@reddit.com, 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 and sexual agency.¹³ The risk of suicide is also a very real issue for victims and there are many

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*

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>

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:

We write to request that Reddit make the following improvements:

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>

- 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,

<p>Argentina</p>	<p>Colombia</p>
<p>Susana Chiarotti, Insgenar</p>	<p>Drisha Fernandes, Expert on men's VAWG & Victim Support</p>
<p>Austria</p>	<p>Croatia</p>
<p>Caroline Sander, Herzwerk direct services</p>	<p>Nela Pamukovic, Centre for Women War Victims</p>
<p>Australia</p>	<p>France</p>
<p>Melinda Tankard Reist, Collective Shout</p>	<p>Catherine Goldman, Fondation Scelles</p>
<p>Anna Kerr, Feminist Legal Clinic Inc.</p>	<p>Claudie Bougon Guibert</p>
<p>Jayneen Sanders, Educate2Empower</p>	
<p>Lucimey Lima Perez, CatholicCare Tasmania</p>	

Eleasa Sieh, Silky Oaks Medical Practice
Melinda Tankard Reist, Collective Shout
Deborah Dicembre, Collective Shout
Anna McCormack, IWD Brisbane Meanjin
Margaret Bergen, WCTU of Victoria
Peter D, Robert Menzies College
Naomi Wilson, Creative Therapy Solutions Australia
Ann-Marie Robinson, Simple Solutions International
Chris Hemsworth, Mobile Counsellor and Workshops
Coralie Alison, Collective Shout
Susan Hawthorne, Spinifex Press
Antoinette Parry
Marta Barake
Natasha Stapleton
Meredith Argo-Stubbs
Amie Illfield
Karen Mitchell
Petra Fonteyn
Kieran Carr
Peta Wassell
Genevieve Muenchhagen
Celeste S
Renee Chopping
Zelda Senior
Angela B
Alison Roberts

Germany

Ingeborg Kraus, Psychologist
Ulrike Rose-Maier, Stop sexkauf

Ghana

Frank Mackay Anim-Appiah, Freedom International

India

Ruchira Gupta, Apne Aap
Rohini Banerjee, South Kolkata Hamari Muskan
Jannu Kranthi, My Choices Foundation

Ireland

Sarah Benson, Women's Aid Ireland
Mary Crilly, Sexual Violence Centre Cork
Mia Christina Doring, Writer, Psychotherapist and Author of 'Any Girl', a memoir of surviving prostitution in Ireland
Jane Callahan

Israel

Luba Fein

Italy

Ruby Till, Associazione Iroko Onlus
Chiara Carpita, Resistenza Femminista

Sue Wells	Kenya
Rebecca H	Tobias Nauruki, Empowered Youth Coalition
Sallie Page	(EYC)-Africa
June Rojas	
Louise Woods	Latvia
Marion Allaburton	Beata Jonite, Centrs MARTA
Rachael McDonnell	
Susan Bishop	Lithuania
Cheryl Mathews	Egle Puidokaite, Klaipeda Social and
Joy Waddingham	Psychological Support Center
Kathleen Ryan	Kristina Misiniene, Center against Human
Sarah Morrison	Trafficking and Exploitation,Lithuania
Bron Warner	
Erica Churchill	Luxembourg
Kay Moncrieff	Cindy Martins
Chris Forder	
Nathan Wilson	Mexico
Dee Beriya	Robin Mata
Vicki Johnston	
Dana Row	Nepal
Clare Hangan	Anil Raghuvanshi, ChildSafeNet
Leticia Moreno	
kali mackessy	New Zealand
Robert Dyball	Nicole Stephens, Stop Trafficking NZ
Clare Nixon	Richard Andrew
Percy Montoya	Pam Norris
Roger Coleman	Ma Piripi
Stephanie Mitchell	Hilary Lumb

Simon Gilmour	Nigeria
Susan Daniel	Elizabeth Oyifie
Clinton Le Page	Omale Roseline Aghatise
Liz Mahanidis	
Nadine Low	Norway
Denise M Cameron	Agnete Strøm, Women's Front of Norway
Kylie Virtue	
Elle Tino	Serbia
Glynis Cochrane	Tanja Ignjatović, Autonomous Women's Center
michael Lilburn	
Erika Meijbaum	Sierra Leone
Gemma Salama	Michael Luseni, Economic Empowerment and Human Rights
Michelle I	
Michael Dine	South Africa
Kaye Johnston	Eugene Mashamba, South Africa's Film and Publication Board (FPB)
Nola Drum	Gloria de Gee gloria, Umgeni Community Empowerment Centre
Donelle S	Grizelda Grootboom, Survivor Exit Program
Ruth Dukes	Catherine Restiau, National Freedom Network
Naomi Thomas	Shaheda Omar, Teddy Bear Clinic
Lisa Brick	Manisha Ramnarain, Tshwane Leadership Foundation
Marie Francis	Susara Nortje, AmazingBrainz Early Childhood Development
Ann Fair	Tershia de Klerk, Joseph Movement
Lauren Thong	Allison Baatjes, Act Africa
Sharon Bonnington	
Graham McDonald	
Marg Laing	
Kayleen Hullah	
Frances Elliott	

Peter Grimes	Last M, S-CAPE Safe House
Tanya Millar	Alta McMaster, Epic Foundation
Caitlin B	Desiree Hoppenstein, General Practitioner
Angelo Materia	Colin Masurik
Michael Perry	Tracy King
Elizabeth Churchward	Marina Reyneke
Janet Grevillea	Chantel Farquharson
Jazz S	Nicolleen Govender
Kevin Cosgrove	Marx-Lenin Nagan
Trevor Tremain	Brent Frieslaar
David Folland	Pierre Joubert
Yvonne Riznyczok	Caryn Turnbull
Melissa Haigg	V Balogun
Kristen Lappan	Christine Doubell
Christine Bennett	Christen√© Gaitskill
Merilyn Muscat	Jacques Rothmann
James Wheeler	Ansie Wayland
Linda Eglington	Nonsikelelo Ngcobo
Maaike van Herp	Sian Sylvester
Meredith Mullaly	
Janice Gorton	Sweden
I Day	Nathalia Guaje, Swedish Women's Lobby
Kirsty McKenzie	Zandra Kanakaris, 1000 Möjligheter
Veronique Douillard	Polana Kovac, Drustvo-Kljuc
Amanda Keel	Emelie Berglund
Helen Dawson	
Angela Dillon-Murray	Switzerland
Sarah Grosvenor	Nana Mallet, End Demand Switzerland

Stacy Dickford	Elisabeth Rupp, Perla Organization
Mel Cr	
Linda Dal Castello	Tanzania
Celia Whittle	Francesco Chearmoung
Liz Schroeder	
Phil Harvie	United Kingdom
Maria A	Julie Swede, Space International
Lynnette Bengtson	Nina Humphries, UKFeminista
Surya Silva	Anna Fisher, NordicModelNow
Elizabeth Hargreaves	Vanessa Morse, CEASE UK
Robyn Sykes	Elly Hanson, Clinical Psychologist
Stephen Bullied	Darryl Mead, The Reward Foundation
Louise Fisher	Haley McNamara, International Centre on Sexual Exploitation
Peter Neesham	Jennifer Drew
Marie-Louise Drew	Anne Agostini
Bev Schneider	L Baker
Amy Soutter	Neia G
Rebecca Everett	Sarah Quick s
Marina Byrne	Sally Fereday
Foiza Nasim	Sue Riley
Robert Kerry	Miriam Osner
Monique Monique	
Kerrie Bain	United States of America
Verity Thomson	Judge Judy Harris Kluger, Sanctuary for Families
Pamela Bedford	
Sarah Soper	Jeanette Westbrook, Survivor
Clive Ellis	Taina Bien-Aime, Coalition Against Trafficking in Women
Tegan J	

June Winsome Smith	Twiss Maynard Butler Butler, Coalition Against Trafficking in Women
Lynne Davis	
Fiona Thompson	Autumn Burris, Survivors for Solutions Linda Blackiston, Institute for Shelter Care
Olove McIntsh	Eleanor Gaetan, Human Trafficking Subject Matter Expert (SME)
Katrina Lyon	
Rachel Wood	Dawn Hawkins, National Center on Sexual Exploitation
Peter Marshall	
Rachel Handelman	Lois A. Herman, WUNRN-Women's UN Report Network
Judi Lister	Gracie Hill, YouMySister
Melanie Nguyen	
Lena de Boer	Winifred Doherty, Good Shepherd
Marie Beatty	International Justice Peace Office
Joan Aphorpe	Holly Hart, National Organization for Women, Liberation Front Women, Declaration International/USA
Margaret Ochsner	
Selina Nivelles	Karen Ingala Smith, NIA Ending Violence
Jon Woods	Lily Y
Charry Hemmings	Avery Stonely
Simon Lanza	Mary Zepina
Mimi Heart	Kristina Dobosz
Liz Kakoschke	Chris Sol
Alison Maldonado	Cheyenne Edwards
Karen Vella	Amanda Smith
Jenni Avenell	Ann Hansen
Ainsley Stock	Marlene Adam
Xanthe Daly	Wendy McKillop
Eleanor Bentham	Yvonne Manly
	Dianne Post
Belgium	

<p>Anna Zobnina, European Network of Migrant Women</p> <p>Brigitte Spiering</p> <p>Canada</p> <p>Glendyne Gerrard, Defend Dignity</p> <p>Barbara Renaud, Vancouver Collective Against Sexual Exploitation</p> <p>Camille Beausejour, BridgeNorth</p> <p>Brian Rae, Buyers Resist</p> <p>Megan Walker, Retired from the London Abused Women Centre</p> <p>Lina MacDonald, Persons Against Non-State Torture</p> <p>Cassandra Diamond</p> <p>Heela Bangash</p> <p>Tony Lee</p> <p>Amanda Paananen</p> <p>Sandra Harrison</p> <p>Andrea Heinz</p> <p>Debbi O, Shaughnessy</p> <p>Natasha Tso</p> <p>Marvy Wheale</p> <p>S Barton</p> <p>Benedict Bertrand</p> <p>Stephan Lorrain</p> <p>Julia Biersteker</p> <p>Louann McCurdy</p> <p>Monica Popaz</p> <p>Carolin Pugh-Roberts</p>	<p>Deborah Sucich</p> <p>Phil Wise</p> <p>Yomayra Torres</p> <p>Cindy Kuro</p> <p>Carole Anne Soong</p> <p>Sarah M meadows</p> <p>Rachel A. Heidorf</p> <p>Cherie Devivi</p> <p>Janine McDonald</p> <p>Laura Ramirez</p> <p>Rebekah Riseborough</p> <p>Arun Raja Pookote</p> <p>Janet Sasaki</p>
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Rachel Rock	
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Nancy Brown	
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