

#### Established 1962

PATRICK A. TRUEMAN, J.D. | Board Member

DAWN E. HAWKINS

Chief Executive Officer

BENJAMIN W. BULL, J.D.

Sr Vice President & General Counsel

#### **BOARD MEMBERS**

RON DEHAAS | Chairman

Founder & CEO, Covenant Eyes

DAN O'BRYANT, J.D | Vice Chairman Former Fellow, Weatherhead Center for International Affairs, Harvard University

RHONDA GRAFF | Secretary

Former Aerospace Program Manager/industrial Engineer

KEN SUKHIA. J.D | Treasurer

Trial and Appellate Lawyer, Sukhia Law Group, PLC

HADLEY ARKES, PH.D.

Ney Professor of Jurisprudence, Emeritus, Amherst College

BETH COONS Chairman, Farnsworth Companies

JOHN FOUBERT, PH.D.

Dean, College of Education, Union University

ROBERT GEORGE, PH.D.

McCormick Professor of Jurisprudence.

Princeton University

DONALD L HILTON, M.D.

Neurosurgeon, University of Texas - San Antonio

DONNA M. HUGHES, PH.D.

Professor, Carlson Endowed Chair, University of Rhode Island

AMBASSADOR SWANEE HUNT

Chair and Founder, Hunt Alternatives; Eleanor Roosevelt Lecturer of Public Policy, Harvard Kennedy School of Government

MARY ANNE LAYDEN, PH.D.

Director, Sexual Trauma and Psychopathology Program, University of Pennsylvania

MOST REVEREND PAUL S. LOVERDE

Bishop, Dioceses of Arlington, VA, Retired

National Regent, Catholic Daughters of the Americas

KINDSEY PENTECOST

President, ItWorks! International

MARGARET RUCKS

Managing Director, Rucks Family Foundation

ALAN SEARS, ESO.

Former President and CEO, Alliance Defending Freedom

LINNEA W. SMITH, M.D.

MELEA STEPHENS, L.P.C., M.M.F.T.

Marriage and Family Therapist

CAROLYN WEST, PH.D.

Professor of Clinical Psychology University of Washington

JUSTICE MICHAEL J. WILKINS

Former Associate Chief Justice, Utah Supreme Court

April 26, 2023

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

Re: Reddit hosting image-based sexual abuse, child sexual abuse material, and promoting violence against women

Dear Mr. Huffman.

We write to inform you that **Reddit will once again be named, for** the third consecutive year, to the annual Dirty Dozen List featuring 12 mainstream contributors to sexual exploitation and **abuse.** The National Center on Sexual Exploitation—a non-partisan nonprofit based in Washington, DC dedicated to addressing the full spectrum of sexual exploitation—calls on Reddit to urgently address the extensive harms and crimes that thrive on your platform. This year's Dirty Dozen List will be revealed on Tuesday, May 2, 2023.

Reddit is known as a hub of image-based sexual abuse, hardcore pornography, prostitution – which very likely includes sex trafficking – and overt cases of child sexual exploitation and child sexual abuse material (CSAM).

Reddit has clearly failed to institute strong policies or implement practices to prevent these harms. NCOSE researchers easily discovered instances of the above-mentioned forms of abuse on your site. And we are not the only ones.

Reddit has come under fire from multiple reputable institutions for its crimes and extensive harms.

"Inside the secret world of trading nudes," an August 2022 investigative BBC report, exposed Reddit for serving as a major hub of image-based sexual abuse where "hundreds of anonymous profiles were dedicated to sharing, trading, and selling explicit images – and it all appeared to be without the permission of the women pictured."<sup>1</sup> One IBSA subreddit alone contained over 20,000 users and 15,000 images of over 150 women, many of whom were doxed – their names and other identifying information were included in the posts. In the

same article, four women reported that it took Reddit over eight months to remove their non-consensual images.

According to a 2022 report by leading child online safety organization Thorn, 58% of caregivers surveyed were familiar with Reddit, and of those, 66% believed their child had sent, re-shared, and/or had their sexually explicit images leaked on Reddit.<sup>2</sup> In 2021, Reddit was sued for refusing to remove CSAM— forcing the victim to *monitor over 35 subreddits* to locate and report her abuse.<sup>3</sup>

A 2022 analysis of 4.5 billion messages across texts, email, YouTube, and 30+ apps and social media platforms by leading child online safety monitoring company, Bark, found Reddit to be the third top app flagged for severe sexual content.<sup>4</sup>

And we know from <u>survivors that Reddit is a hub for pimps/sex traffickers to advertise children and adult victims for sex</u>. Pornographic content serves as ads for prostitution and sex trafficking. Research by a proprostitution group found that roughly 53% of content creators use Reddit to find potential sex buyers. 6

A few weeks ago, you received <u>a letter from more than 300 organizations and individuals</u> – including survivors – from roughly 40 countries, demanding Reddit address the rampant image-based sexual abuse found on your platform. NCOSE was a primary signatory, and at the urging of many of the entities endorsing the letter, we decided to place Reddit on the Dirty Dozen List once again to elevate the global call for your platform to reform.

We urge Reddit to implement the following recommendations with the urgency commensurate with the gravity of harm on your platform:

- 1. **Implement robust age and consent verification measures** ban pornography and sexually explicit content until such measures are **actively enforced** to prevent image-based sexual abuse and child sexual abuse content on Reddit
- 2. Require mandatory email verification for current and future users, as anonymity allows for abuse without accountability
- 3. Make Reddit 17+ and prevent minors from accessing your platform both Apple App Store and Google Play age ratings for Reddit are 17+ and M for "Mature," respectively. Given that pornography is so easily accessible and other harms are rampant, children should not be on Reddit; asking Reddit for parental controls or other safety measures would be like asking Pornhub to make itself kid-friendly.
- 4. **Implement accessible and easy reporting mechanisms** Reddit currently has insufficient measures for users to report other users or offending moderators, and moderators themselves don't have adequate means to report and remove prohibited and illegal content
- 5. **Ban external links to pornography and sexually explicit media** the links NCOSE researchers found frequently led to sexually explicit content on pornography sites and social media platforms that contained indicators of IBSA and CSAM

## Image-Based Sexual Abuse and Child Sexual Abuse Material on Reddit

<u>Image-based sexual abuse</u> (IBSA) is a broad term that includes a multitude of harmful experiences, such as non-consensual sharing of sexual images (sometimes called "revenge porn"), pornography created using someone's face without their knowledge (or sexual deepfakes), non-consensual recording or capture of

intimate nude images (including so-called "upskirting" or surreptitious recordings in places such as restrooms and locker rooms via "spycams"), recording of sexual assault, the use of sexually explicit or sexualized materials to groom or extort a person (also known as "sextortion") or to advertise commercial sexual abuse, and more.<sup>8</sup>

Importantly, sexually explicit or sexualized material depicting children ages 0-17 constitutes a distinct class of material known as child sexual abuse material (CSAM – the more appropriate term for "child pornography"), which is illegal to knowingly possess, access, reproduce, and distribute under US federal law. CSAM should not be conflated with IBSA, 9 though the two crimes are closely related.

Both IBSA and CSAM are easily found on Reddit, despite the fact that both are rightly prohibited. Reddit has no meaningful age and consent verification and lacks effective content moderation practices, providing the perfect environment for these types of abuses to proliferate.

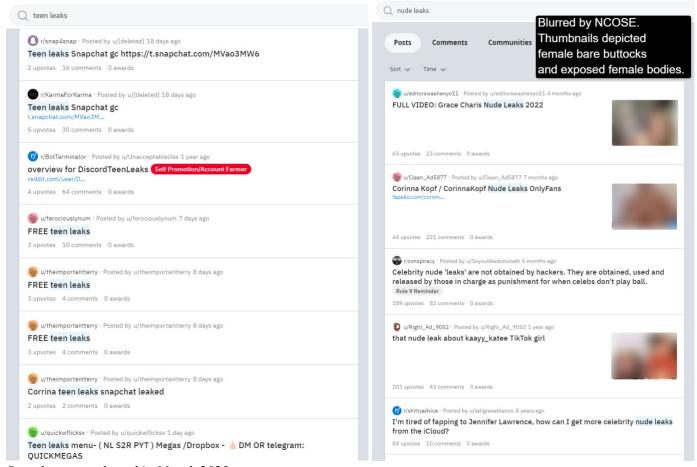
We understand that Reddit has a <u>non-consensual intimate media policy</u><sup>10</sup> (what you call Rule 3) that was then updated in March 2022 with the post "<u>Never Post Intimate or Sexually Explicit Media of Someone Without their Consent</u>" and r/redditsecurity post titled "<u>Evolving our Rule on Non-Consensual Intimate Media Sharing</u>." We have also reviewed Reddit's recently released <u>Transparency Report</u><sup>13</sup> and the ArsTechnica article "<u>Reddit cracked down on revenge porn, creepshots with twofold spike in permabans</u>." While we commend any efforts Reddit has made in combatting IBSA and CSAM, it is not nearly enough.

When pressure-testing the effectiveness of Reddit's policy the day Reddit's Transparency Report was announced and in the weeks following, NCOSE researchers found extensive evidence of IBSA and indicators of CSAM on the platform within a few minutes. We identified over a dozen subreddits dedicated to the creation, dissemination, selling, and requesting of sexual deepfakes and AI-generated pornography (all of which are prohibited by the policy).

Reddit's <u>non-consensual intimate image policy</u> includes banning of AI-generated and sexual deepfakes, prohibiting "depictions that may have been faked...or soliciting 'lookalike' pornography (e.g. 'deepfakes' or 'bubble porn')."<sup>15</sup> Yet two weeks after the Transparency Report was released, a <u>Rolling Stone</u> article revealed how two computer science students had been selling sexually explicit images to other Redditors using an AI-generated 19-year-old woman named Claudia. <sup>16</sup> Claudia was generated using Stable Diffusion's technology and was highly realistic. They reported making roughly \$100 before Claudia was shut down.

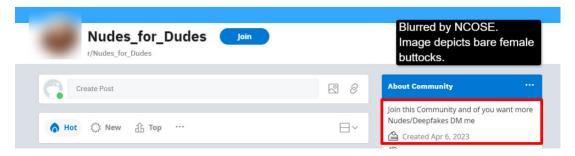
Searches for 'teen leaks' (likely CSAM) and 'nude leaks' (IBSA, which could also include CSAM if images are of minors) returned dozens of results.

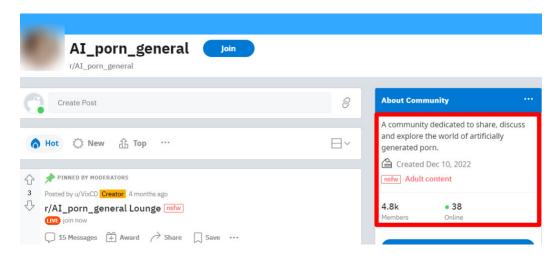
The following are screenshots of a few samples of IBSA and links to potential CSAM<sup>17</sup> NCOSE researchers found between late March and mid-April.



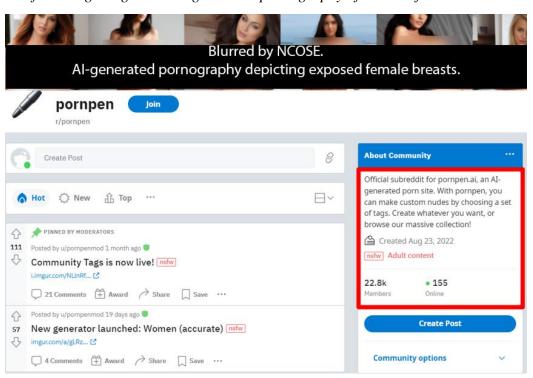
Search was conducted in March 2023

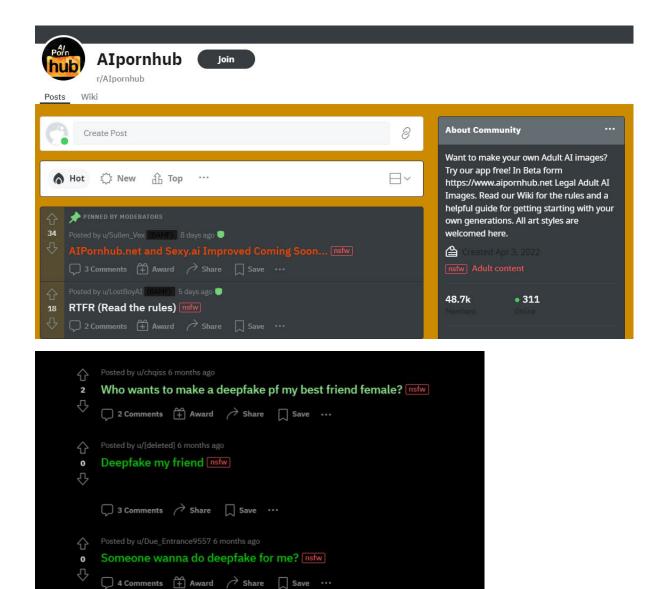
AI and deepfake pornography are easily found.





The following images are AI-generated pornography of unidentifiable individuals.





Search was conducted in April 2023

In one subreddit r/celebritiesDEEPFAKES, a user posted a link to a sexual deepfakes Telegram group chat containing over 58,000 members.



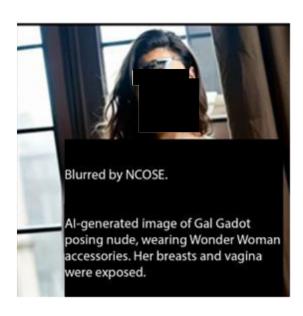
Search was conducted in April 2023

Redditors even <u>compiled a document</u> listing the AI-generated pornography and sexual deepfake subreddits for interested members. 18



Search was conducted in April 2023

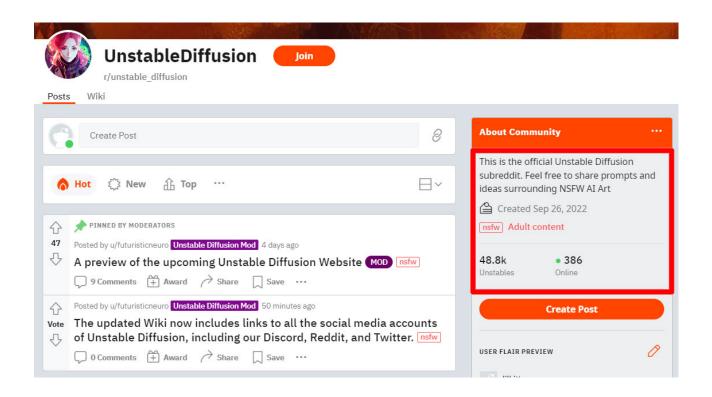
Many of these communities contain sexual deepfakes and AI-generated pornography of identifiable individuals. This is image-based sexual abuse.

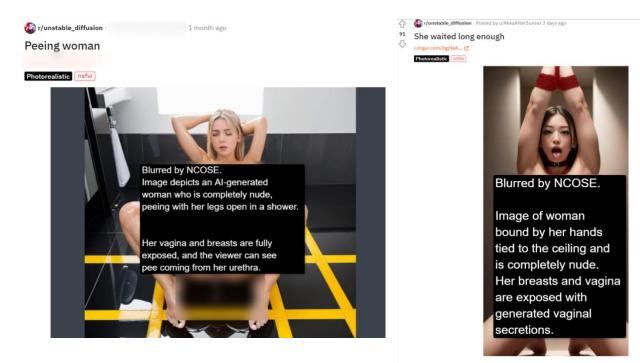




Search was conducted in April 2023

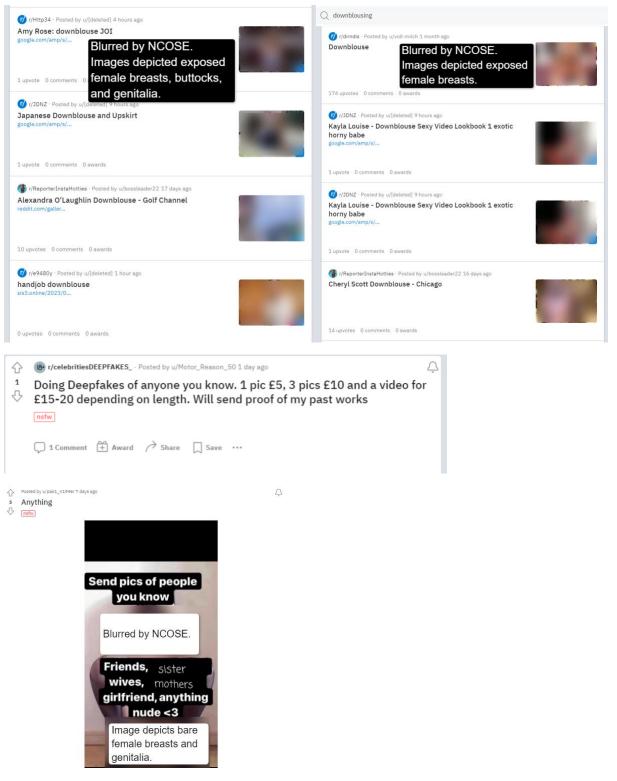
Even the most apparent violations go unchecked by Reddit, such as <u>r/UnstableDiffusion</u>, a dedicated sexual deepfake community of over 48,000 members that is currently active on Reddit. <sup>19</sup> They have amassed over 15 million "donated" sexually explicit and pornographic images to train their sexual deepfake technology and post sexual deepfakes and AI-generated pornography on an hourly basis on Reddit.





Search was conducted in April 2023

Other forms of IBSA are also prevalent on Reddit. NCOSE researchers quickly found content such as upskirting/down blousing and selling of IBSA services or content on Reddit and other platforms.

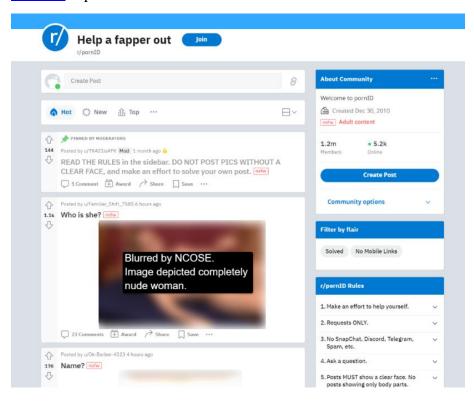


Search was conducted in April 2023

Many of these images often included doxing. Although Reddit banned non-consensual dissemination of sexually explicit media and doxing in 2015 after the celebrity iCloud leak known as "<u>TheFappening</u>" on Reddit (r/thefappening), similar communities still exist today.<sup>20</sup>

NCOSE researchers identified a similar subreddit called r/PornID (Help a fapper out), containing **over 1.3 million members**, that allowed users to post images of pornography performers, content creators, or other influential women for members to help identify their real names.

Doxing was also highlighted in the August 2022 BBC article detailing the prevalence of <u>doxing that victims</u> of IBSA experience on Reddit.<sup>21</sup>



Search was conducted in April 2023

#### Reports of Child Sexual Abuse Materials (CSAM) on Reddit

In 2021, Reddit was <u>sued by 6 victims of CSAM</u> for knowingly profiting from and facilitating their abuse.<sup>22</sup> Although the case was dismissed in 2022, Reddit continues to be implicated in CSAM cases.

The following cases are just a few reports from the past year:

- In September 2022, <u>a 47-year-old Kentucky teacher</u> was arrested after the Internet Crimes Against Children Task Force discovered he had posted CSAM on his Reddit account.<sup>23</sup>
- In October 2022, a <u>Porter County man</u> was arrested for disseminating CSAM on Reddit and was held on a \$25,000 bond.<sup>24</sup>
- In January 2023, a <u>44-year-old Maryland man</u> was arrested on numerous charges related to rape, sexual solicitation of a minor (through Reddit), and dissemination of CSAM.<sup>25</sup>

- On March 14, 2023, a 34-year-old Salina, OK man was charged with numerous counts of disseminating CSAM after investigators found he had been sharing CSAM on Reddit. 26 Investigators estimated the man had over 15,000 images of CSAM depicting teenage girls between the ages of 13 and 16. The man was "bragging" to other Redditors that he had been engaging in sex with a 12-year-old girl while her grandmother and mother watched.
- On March 29, 2023, another man was <u>charged on five counts</u> related to cyberstalking, hacking, and selling CSAM and IBSA on Reddit, Twitter, and Telegram.<sup>27</sup>

Reddit's community-driven, volunteer moderator approach creates a space for ambiguity and inconsistency in implementation between specific moderator rules and content that Reddit's policies prohibit – such as CSAM. A <u>study by Kikerpill et al.</u> analyzing online community reactions to the 2018 rule that banned sexual deepfakes and expanded the platform's policies on 'involuntary pornography' and the sexualization of minors found Reddit's policies surrounding these issues to lack transparency and consistency.<sup>28</sup> The study also **suggests Reddit's lack of transparency contributes to the co-occurrence of CSAM and IBSA on Reddit.** 

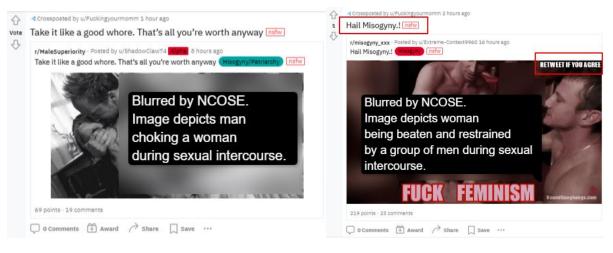
Until Reddit can implement a robust age and consent verification process for sexually explicit content, and create clarity and consistency for policy implementation, pornography must be prohibited to stem the IBSA and CSAM rampant on Reddit.

Reddit should also consider **removing all "save video" bots from the platform**. They allow users to save non-consensual content and contribute to the proliferation of IBSA and CSAM.

#### Severe Sexual Content, Sexual Violence, and Sexualization of Minors on and through Reddit

Sexual violence and misogyny are rife on Reddit. Adrienne Massanari defined Reddit communities as "toxic technocultures" – a hub for anti-feminist and misogynistic activism – and demonstrated that "Reddit's design, algorithm, and platform politics" implicitly support these types of cultures.<sup>29</sup> This continues to be true several years after the study was published.

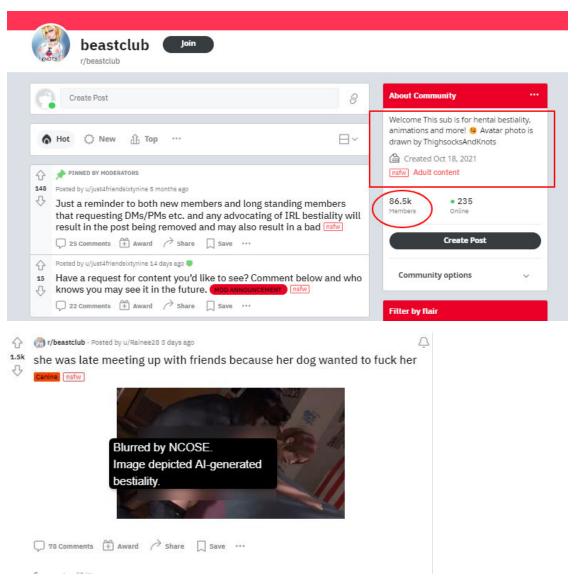
Although Reddit banned hate speech and sexism/misogyny from their platform, communities like r/jailbait\_ll, a reiteration of the now defunct r/jailbait community that was banned in 2012 for inciting violence against women and hosting CSAM, continue to exist on Reddit.



Search was conducted in April 2023

Reddit's lack of prioritization on reducing harm on the platform remains evident, as exemplified by this quote in <u>The Washington Post</u>, "Our most important policy over the last ten years has been to allow just about anything so long as it does not prevent others from enjoying Reddit for what it is: the best place online to have truly authentic conversations." Although Reddit frequently updates their content policies on sexually explicit imagery, these policies remain ambiguous and unclear, obfuscating the boundary between content Reddit deems 'offensive' and content Reddit 'prohibits.' This is seen in the type of content allowed within 'borderline' communities.

Although bestiality is illegal and sexual deepfakes are prohibited on Reddit, one community containing over 86,000 members was dedicated to the creation of AI-generated bestiality.



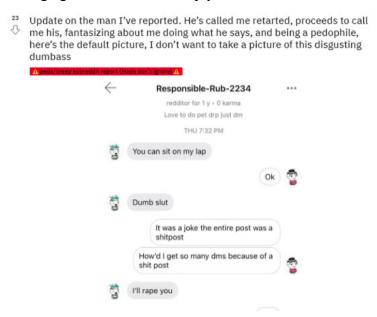
Search was conducted in April 2023

NCOSE researchers also found evidence of content promoting the sexualization of minors.



Search was conducted in April 2023

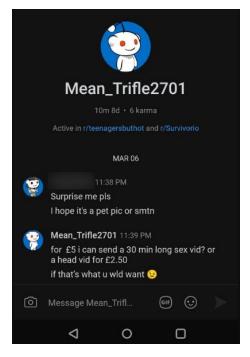
Children are also reporting experiences of sexual violence on Reddit. Many of these reports were regarding messages related to experimental and violent sexual practices, such as BDSM. One man threatened to rape a teenage girl if she didn't comply with his demands.

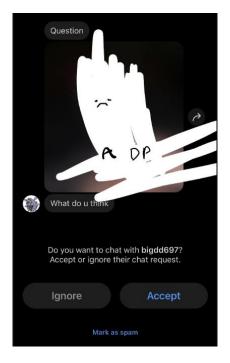


Search was conducted in April 2023

Teenage users frequently report experiences of receiving unsolicited sexually explicit images from older men in their private messages (cyberflashing) in addition to reporting experiences of sexual solicitation, in which predatory adults *request to send or receive* sexually explicit images from teenagers. The second image below was an instance of cyberflashing, in which an adult male privately sent an image of his erect

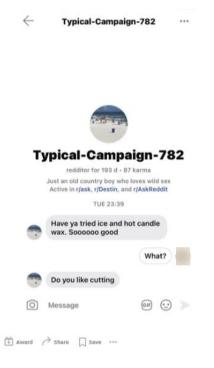
penis to a teenager. The teenager colored over the image before posting it and indicated the content depicted in the image; DP stands for 'dick pic.' Notably, this was the first message sent by the adult user to the teenager.





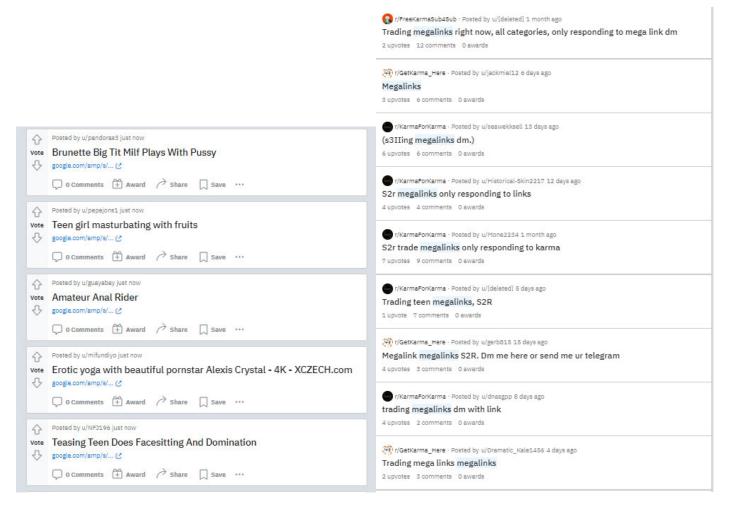
Search was conducted in April 2023

A few messages teenagers received were related to self-harm. This is concerning given that Bark has named Reddit in the top five apps flagged for severe suicidal ideation two years in a row.<sup>31</sup>



Search was conducted in April 2023

Further, links, videos, and gifs posted on Reddit lead to sexually explicit content on sites also known for rampant CSAM and IBSA, such as (but not limited too) Imagur, Gify, Discord, Twitter, and Mega. In fact, the majority of the links NCOSE researchers found led to content with descriptions containing words or phrases sexualizing minors or suggesting potential CSAM.



Search was conducted in April 2023

Reddit not only fails to provide a positive and safe environment for teenagers on their platform – it is endangering young people. Therefore, NCOSE demands Reddit immediately ban minors from using your platform. (Even Apple App Store and Google Play accurately rate Reddit at 17+ and M for "Mature," respectively).

# Absence of Industry-Standard Protections and Practices and Poor Policy Implementation on Reddit Create an Ecosystem of Exploitation

#### Lack of accountability.

Reddit is substantially behind current safety and moderation practices, failing to implement even the most basic safety practices, such as requiring a verified email address – something that is now much of an industry-wide standard. As a result, <u>ban evasions, throw-away accounts</u>, and escaping accountability for posting harmful and illicit content are commonplace on Reddit.<sup>32</sup> Instagram, Facebook, and TikTok all

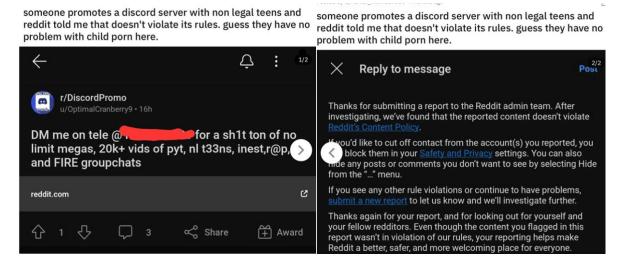
require users to provide a valid email address to create a profile on their app and limit the ability to search content without creating an account – basic features that Reddit fails to require.

#### <u>Lack of either protection or tools for moderators.</u>

One study estimated that moderators do a total of \$3.4 million worth of unpaid moderation for Reddit.<sup>33</sup> Female moderators have also reported experiencing abuse once community members are aware of their gender, further contributing to Reddit's problems with misogyny and sexism.<sup>34</sup> Moderators have experienced abuse at the hands of throw-away accounts for attempting to make their communities safe and enjoyable environments – something Reddit admins fail to achieve.<sup>35</sup>

#### Lack of reporting mechanisms.

Reddit also fails to provide effective and easy reporting mechanisms for users and moderators on their platform. Even when one user reported the sale of suspected CSAM, Reddit refused to act.

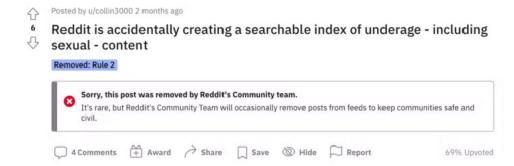


Search was conducted in April 2023

This is especially concerning given that moderators do not have the tools or ability to remove content from Reddit permanently. Moderators can "remove" content and ban users from subreddits, but the content continues to exist on the platform marked as [removed] and remains visible until a Reddit Admin physically deletes the [removed] content.<sup>36</sup>

An article in 2022 <u>exposed Reddit's refusal</u> to allow moderators to remove content,<sup>37</sup> which inadvertently led to a collection of posts in the subreddit <u>r/TikTokThots</u>, a community of 1.3 million users; moderators removed posts containing potential CSAM that remain searchable on Reddit today.<sup>38</sup>

When the <u>user exposed Reddit's 'loophole,'</u> their post was removed by Reddit Admins. How is it that Reddit Admins immediately removed a post exposing their refusal to remove potential CSAM but not the actual evidence itself?<sup>39</sup>

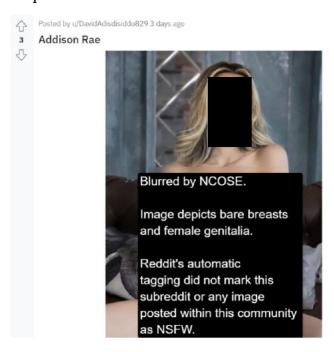


Search was conducted in April 2023

#### Failure to implement existing policies.

As noted earlier in the letter and exemplified throughout, Reddit fails to implement its own policies – with newly announced policies easily proven ineffective.

In addition to the example of the recently updated IBSA policy which failed NCOSE researcher testing, Reddit announced <u>automatic tagging of NSFW images</u> in March 2022.<sup>40</sup> Despite Reddit's promise to automatically tag sexually explicit images as NSFW, this failed to occur for many of the images within these deepfake and IBSA communities.



Search was conducted in April 2023

Having scrutinized Reddit's policies and the reality in practice, we must come to the conclusion that your platform merely reacts to bad press – touting new policies on paper but failing to implement them or enact substantive change. In fact, in the aforementioned study by <u>Kikerpill et al.</u> analyzing online community reactions via comments made in response to Reddit's 2018 rule change that banned sexual deepfakes, researchers found Reddit's content policy updates to be purely reactionary, "occurring more from the company's fear of financial setbacks due to negative publicity, and not from any real concern about obscene, inappropriate, or harmful content." The researchers further explained, "Regarding Reddit and

the new rules on involuntary pornography and the sexualization of minors, enforcement of sitewide policy appears contingent on external influences, such as attention from mainstream media or financial matters, rather than stemming from an inherent stance on decreasing community-harming activities."<sup>42</sup> Announcing rules prohibiting this content and activity is an acknowledgement that they are harmful and that they have occurred on your platform. Failing to implement meaningful action to enforce these policies demonstrates this is only window-dressing.

As the owner of one of the top 20 internet platforms in the <u>world</u>,  $^{43}$  valued at over \$6 billion, with over **52 million** daily active users, **4 million daily** posts, and a further **2 billion** comments – *you are responsible* for the current toxicity that plagues your platform.

Reddit is dangerous by its very design. For over a decade, Reddit has failed to implement effective and meaningful policies, touting free speech and privacy over the safety and well-being of its users – despite the overwhelming evidence of harmful and violent behavior facilitated on your platform.

As you have been notified many times, and as your policies reflect, you are aware of the dangers occurring on your platform and choose to remain complacent. But perhaps others are not as well-informed of the abuse Reddit facilitates. Therefore, until you decide to radically transform your platform, NCOSE will continue elevating the destructive realities of Reddit with policymakers, police, the press, parents, the general public – and most aggressively with potential investors as you plan to go public.

Respectfully,

Patrick Trueman, Esq.

**Dawn Hawkins** 

Mur Hautur

President

CEO

Cc:

Jen Wong, Chief Operating Officer

Nellie Peshkov, Chief People and Culture Officer

Shariq Rizvi, Executive Vice President of Monetization

Attached is a joint National Center on Sexual Exploitatoin letter on IBSA sent to Reddit in April 2023.

<sup>&</sup>lt;sup>1</sup> Monika Plaha and Panorama Team, "Inside the Secret World of Trading Nudes," *BBC News*, August 22, 2022, https://www.bbc.com/news/uk-62564028.

<sup>&</sup>lt;sup>2</sup> Thorn and Benenson Strategy Group, *The Role of Caregivers: Safeguarding & Enhancing Youth Resilience Against Harmful Sexual Encounters Online* (Thorn, 2022), <a href="https://info.thorn.org/hubfs/Research/Thorn-RoleOfCaregivers-2022-FullReport.pdf">https://info.thorn.org/hubfs/Research/Thorn-RoleOfCaregivers-2022-FullReport.pdf</a>.

<sup>3</sup> Adi Robertson, "Reddit Faces Lawsuit for Failing to Remove Child Sexual Abuse Material," *The Verge*, April 25, 2021, <a href="https://www.theverge.com/2021/4/25/22399306/reddit-lawsuit-child-sexual-abuse-material-fosta-sesta-section-230">https://www.theverge.com/2021/4/25/22399306/reddit-lawsuit-child-sexual-abuse-material-fosta-sesta-section-230</a>.

- <sup>4</sup> "Bark's Annual Report 2022," Bark, accessed April 24, 2023, <a href="https://www.bark.us/annual-report-2022">https://www.bark.us/annual-report-2022</a>.
- <sup>5</sup> NCOSE, "Tina Frundt | EARN IT Act Briefing," YouTube, March 10, 2022, <a href="https://www.youtube.com/watch?v=6dtXAHFcVRw">https://www.youtube.com/watch?v=6dtXAHFcVRw</a>.
- <sup>6</sup> SWCEO, SWCEO's 2022 State of the Creator (Sex Work CEO, 2022), https://www.sexworkceo.com/creator-report.
- <sup>7</sup> NCOSE, "International Advocates from 31 Countries Call Out Reddit for Rampant Image-based Sexual Abuse," *National Center on Sexual Exploitation*, April 26, 2023, <a href="https://endsexualexploitation.org/articles/international-advocates-from-31-countries-call-out-reddit-for-rampant-image-based-sexual-abuse">https://endsexualexploitation.org/articles/international-advocates-from-31-countries-call-out-reddit-for-rampant-image-based-sexual-abuse</a>.
- <sup>8</sup> NCOSE, "Image Based Sexual Abuse," National Center on Sexual Exploitation, accessed April 21, 2023, https://endsexualexploitation.org/issues/image-based-sexual-abuse.
- <sup>9</sup> NCOSE, "5 Types of Image-Based Sexual Abuse You Should Know About," *National Center on Sexual Exploitation*, April 11, 2023, <a href="https://endsexualexploitation.org/articles/5-types-of-image-based-sexual-abuse-you-should-know-about">https://endsexualexploitation.org/articles/5-types-of-image-based-sexual-abuse-you-should-know-about</a>.
- 10 "Reddit Content Policy," Reddit, accessed April 24, 2023, https://www.redditinc.com/policies/content-policy.
- <sup>11</sup> "Never Post Intimate or Sexually Explicit Media of Someone Without Their Consent," Account and Community Restrictions, Reddit, accessed April 24, 2023, <a href="https://www.reddithelp.com/hc/en-us/articles/360043513411">https://www.reddithelp.com/hc/en-us/articles/360043513411</a>.
- <sup>12</sup> u/cuqueta, "Evolving our Rule on Non-Consensual Intimate Media Sharing," r/redditsecurity, Reddit, accessed April 24, 2023, https://www.reddit.com/r/redditsecurity/comments/t8zloo/evolving our rule on nonconsensual intimate media.
- 13 "2022 Transparency Report," Reddit, accessed April 24, 2023, https://www.redditinc.com/policies/2022-transparency-report.
- <sup>14</sup> Ashley Belanger, "Reddit Cracked Down on Revenge Porn, Creepshots with Twofold Spike in Permabans," *ArsTechnica*, March 29, 2023, <a href="https://arstechnica.com/tech-policy/2023/03/reddit-cracked-down-on-revenge-porn-creepshots-with-2-fold-spike-in-permabans">https://arstechnica.com/tech-policy/2023/03/reddit-cracked-down-on-revenge-porn-creepshots-with-2-fold-spike-in-permabans</a>.
- <sup>15</sup> "Never Post Intimate or Sexually Explicit Media," ibid.
- <sup>16</sup> EJ Dickson, "They're Selling Nudes of Imaginary Women on Reddit and It's Working," *Rolling Stone*, April 10, 2023, https://www.rollingstone.com/culture/culture-features/ai-nudes-selling-reddit-1234708474.
- <sup>17</sup> Note: NCOSE did not click on potential CSAM links
- <sup>18</sup> "NSFW AI Tools Guide v1," Google Docs, accessed April 24, 2023,
- $\underline{https://docs.google.com/document/d/10zUeyPhhm} \quad \underline{g2HAxdV8dbgGg5qhEsDv9AktFDyYMKTLw/edit\#heading=h.ynovj8ki51fe}.$
- <sup>19</sup> "r/unstable\_diffusion," Reddit, accessed April 24, 2023, <a href="https://www.reddit.com/r/unstable\_diffusion">https://www.reddit.com/r/unstable\_diffusion</a>.
- <sup>20</sup> "Your Place for the Fappening Part 2: Electric Boogaloo," r/TheFappeningII, Reddit, accessed April 24, 2023, <a href="https://www.reddit.com/r/TheFappeningII">https://www.reddit.com/r/TheFappeningII</a>.
- <sup>21</sup> Plaha and Panorama Team, ibid.
- <sup>22</sup> Jane Does No. 1-6 and John Does No. 2, 3, and 5 v. Reddit, Inc., United States Court of Appeals for the Ninth Circuit, Case No. 21-56293, October 24, 2022, <a href="https://cdn.ca9.uscourts.gov/datastore/opinions/2022/10/24/21-56293.pdf">https://cdn.ca9.uscourts.gov/datastore/opinions/2022/10/24/21-56293.pdf</a>.
- <sup>23</sup> Fox Digital Staff, "NKY Teacher Arrested, Accused of Posting Child Porn on Social Media, Court Documents Show," *Cincinnati Enquirer*, March 28, 2023, <a href="https://www.cincinnati.com/story/news/crime/2023/03/28/northern-kentucky-teacher-arrested-for-alleged-social-media-porn-posts/70057380007">https://www.cincinnati.com/story/news/crime/2023/03/28/northern-kentucky-teacher-arrested-for-alleged-social-media-porn-posts/70057380007</a>.
- <sup>24</sup> Bob Kasarda, "UPDATE: \$25,000 Bond for Porter County Man Accused of Using Reddit for Child Porn," *NWI Times*, December 11, 2022, <a href="https://nwitimes.com/news/local/crime-and-courts/update-25-000-bond-for-porter-county-man-accused-of-using-reddit-for-child-porn/article-46d56cf0-240d-5999-8730-bfebe0ce641b html">https://nwitimes.com/news/local/crime-and-courts/update-25-000-bond-for-porter-county-man-accused-of-using-reddit-for-child-porn/article-46d56cf0-240d-5999-8730-bfebe0ce641b html</a>.
- <sup>25</sup> Alanea Cremen, "Police: Man Raped Teen after Meeting on Snapchat, Reddit," *WUSA 9*, February 1, 2023, https://www.wusa9.com/article/news/local/maryland/man-accused-raping-13-year-old-he-met-online-snapchat-reddit/65-443c9a07-02ab-498a-992e-64b5d7fdd5d5.
- <sup>26</sup> Sheila Stogsdill, "'Thousands' of Images of Child Porn Reportedly Found on Oklahoma Man's Cell Phone," *KSN Fourstates Homepage*, March 14, 2023, <a href="https://www.fourstateshomepage.com/local-news/thousands-of-images-of-child-porn-reportedly-found-on-oklahoma-mans-cell-phone">https://www.fourstateshomepage.com/local-news/thousands-of-images-of-child-porn-reportedly-found-on-oklahoma-mans-cell-phone</a>.
- <sup>27</sup> Department of Justice, U.S. Attorney's Office District of Puerto Rico, "Man Who Ran Twitter, Reddit And Telegram Accounts Selling Intimate Photos Hacked from Female Victims' Accounts Charged with Possession, Distribution and Sale of Child Pornography; Cyberstalking; and Conspiracy to Hack Computers," news release, March 30, 2023, <a href="https://www.justice.gov/usao-pr/pr/man-who-ran-twitter-reddit-and-telegram-accounts-selling-intimate-photos-hacked-female">https://www.justice.gov/usao-pr/pr/man-who-ran-twitter-reddit-and-telegram-accounts-selling-intimate-photos-hacked-female</a>.
- <sup>28</sup> Kristjan Kikerpill, Andra Siibak, and Suido Valli, "Dealing with Deepfakes: Reddit, Online Content Moderation, and Situational Crime Prevention," in *Theorizing Criminality and Policing in the Digital Media Age (Studies in Media and Communications, Vol. 20)*, ed. Julie B. West (Emerald Publishing Limited, 2021), 25-45, <a href="https://doi.org/10.1108/S2050-206020210000020008">https://doi.org/10.1108/S2050-206020210000020008</a>.
- <sup>29</sup> Adrienne Massanari, "#Gamergate and The Fappening: How Reddit's Algorithm, Governance, and Culture Support Toxic Technocultures," *New Media & Society* 19, no. 3 (2017): 329-346, doi:10.1177/1461444815608807.
- <sup>30</sup> Hayley Tsukayama, "Reddit Introduces a New Content Policy that Makes Some Content 'Opt-In'," *The Washington Post*, August 5, 2015, <a href="https://www.washingtonpost.com/news/the-switch/wp/2015/08/05/reddit-introduces-a-new-content-policy-that-makes-some-content-opt-in">https://www.washingtonpost.com/news/the-switch/wp/2015/08/05/reddit-introduces-a-new-content-policy-that-makes-some-content-opt-in</a>.

https://www.reddit.com/r/ModSupport/comments/y6f3hv/ban evasion cannot be verified or enforced if the.

https://www.reddit.com/r/modsupportremovals/comments/qb0i04/ucollin3000 removed rule 2 was removed from.

<sup>31 &</sup>quot;Bark's Annual Report 2022," ibid.

<sup>&</sup>lt;sup>32</sup> u/NITRO1250, "Ban Evasion Cannot be Verified or Enforced if the User Deletes their Reddit Account?" r/ModSupport, Reddit, accessed April 24, 2023,

<sup>&</sup>lt;sup>33</sup> Chris Stokel-Walker, "Reddit Moderators do \$3.4 Million Worth of Unpaid Work Each Year," *New Scientist*, June 24, 2022, <a href="https://www.newscientist.com/article/2325828-reddit-moderators-do-3-4-million-worth-of-unpaid-work-each-year">https://www.newscientist.com/article/2325828-reddit-moderators-do-3-4-million-worth-of-unpaid-work-each-year</a>.

<sup>&</sup>lt;sup>34</sup> Benjamin Plackett, "Unpaid and Abused: Moderators Speak Out Against Reddit," *Engadget*, August 31, 2018, <a href="https://www.engadget.com/2018-08-31-reddit-moderators-speak-out.html">https://www.engadget.com/2018-08-31-reddit-moderators-speak-out.html</a>.

<sup>35</sup> Ibid.

<sup>&</sup>lt;sup>36</sup> Reddit Help, "What Mods Can't Do," Becoming a Moderator, Reddit, accessed April 24, 2023, https://mods reddithelp.com/hc/en-us/articles/360002317172-What-mods-can-t-do?ref=hackernoon.com.

<sup>&</sup>lt;sup>37</sup> TheMarkup, "Why Are Removed Posts Still Visible on Reddit?" *Hackernoon*, June 15, 2022, <a href="https://hackernoon.com/why-are-removed-posts-still-visible-on-reddit">https://hackernoon.com/why-are-removed-posts-still-visible-on-reddit</a>.

<sup>&</sup>lt;sup>38</sup> "TikTokThots," r/tiktokthots, Reddit, accessed April 24, 2023, https://www.reddit.com/r/tiktokthots.

<sup>&</sup>lt;sup>39</sup> u/GiversBot, "/u/collin3000 [REMOVED: RULE 2] was removed from /r/ModSupport on 2021-10-19 (t3\_qaxfyh up 0.12 days)," r/modsupportremovals, Reddit, accessed April 24, 2023,

<sup>&</sup>lt;sup>40</sup> u/uselessKnowledgeGuru, "Announcing an Update to Our Post-Level Content Tagging," r/redditsecurity, Reddit, accessed April 24, 2023, <a href="https://www.reddit.com/r/redditsecurity/comments/tl71g0/announcing">https://www.reddit.com/r/redditsecurity/comments/tl71g0/announcing</a> an update to our postlevel content.

<sup>&</sup>lt;sup>41</sup> Kikerpill, Siibak, and Valli, ibid.

<sup>42</sup> Ibid.

<sup>&</sup>lt;sup>43</sup> Brooke Auxier and Monica Anderson, "Social Media Use in 2021," *Pew Research Center*, April 7, 2021, <a href="https://www.pewresearch.org/internet/2021/04/07/social-media-use-in-2021">https://www.pewresearch.org/internet/2021/04/07/social-media-use-in-2021</a>.

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 320 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.

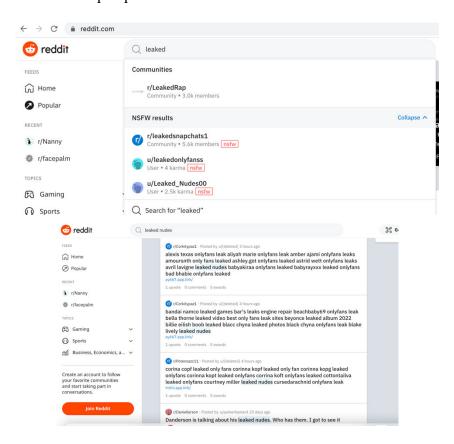
Image-based Sexual Abuse (IBSA) is the creation, theft, extortion, threatened or actual distribution, or any use of sexualized or sexually explicit materials without the meaningful consent of the person depicted. Often, IBSA includes the use of sexually explicit or sexualized materials to groom or extort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

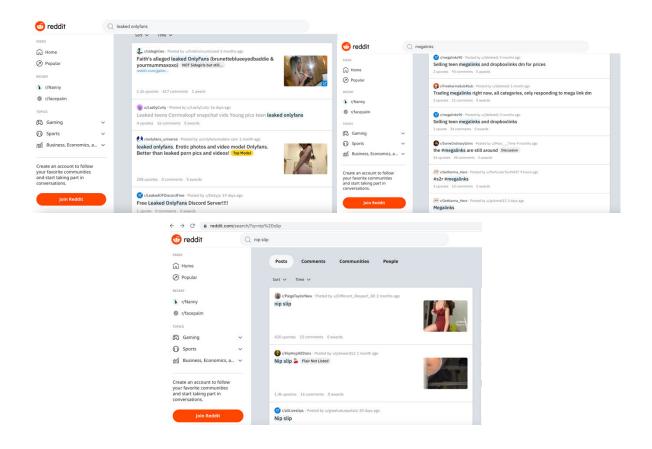
We recognize that Reddit has published an updated policy in March 2022 entitled "Evolving our Rule on Non-Consensual Intimate Media Sharing" and has spoken about hashing initiatives to remove reported cases of IBSA. While these are steps forward, Reddit's failure to enact meaningful age and consent verification practices or to overhaul ineffective moderation strategies continues to allow such exploitive 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 additional trading/selling of IBSA, and other posts violating Reddit's policies such as "nip slips."

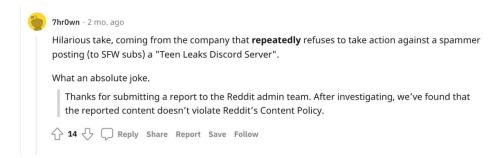


<sup>&</sup>lt;sup>1</sup> "Never Post Intimate or Sexually Explicit Media of Someone Without Their Consent" *Reddit*, 2022, https://www.reddithelp.com/hc/en-us/articles/360043513411

<sup>&</sup>lt;sup>2</sup> "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.

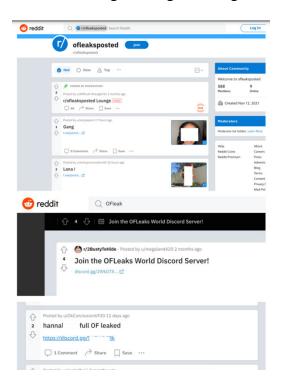


The premise that Reddit's existing report flows and processes for identifying IBSA are sufficient is inherently flawed.

Reddit has no meaningful age or consent verification for sexually explicit or suggestive content. History has shown that exploitation inevitably proliferates whenever platforms allow explicit

content but fail to enforce meaningful age/consent verification for depicted persons. For example, many pornography platforms have been caught hosting 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,<sup>3</sup> and similar cases in France,<sup>4</sup> the Czech Republic,<sup>5</sup> and more.

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

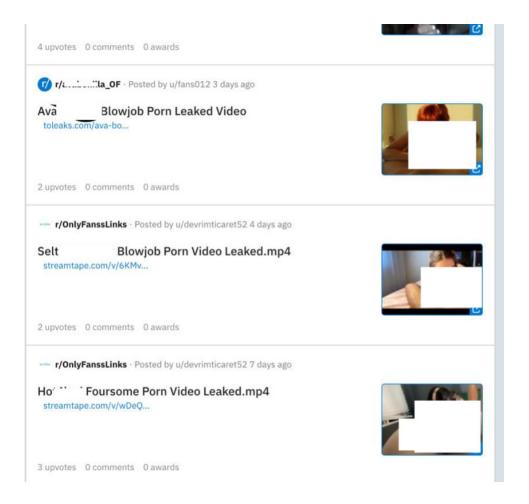


-

<sup>&</sup>lt;sup>3</sup> 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, <a href="https://www.nytimes.com/2019/10/11/us/porn-sex-trafficking.html">https://www.nytimes.com/2019/10/11/us/porn-sex-trafficking.html</a>.

<sup>&</sup>lt;sup>4</sup> 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

<sup>&</sup>lt;sup>5</sup> 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 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.<sup>6</sup>
- 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.<sup>7</sup>

<sup>&</sup>lt;sup>6</sup> 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

<sup>&</sup>lt;sup>7</sup> "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.<sup>8</sup>
- 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."
- 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.<sup>11</sup>

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." 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. The risk of suicide is also a very real issue for victims and there are many

<sup>&</sup>lt;sup>8</sup> 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

<sup>&</sup>lt;sup>9</sup> "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

<sup>&</sup>lt;sup>10</sup> 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

<sup>&</sup>lt;sup>11</sup> 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 <sup>12</sup> Eaton, Asia; Jacobs, Holly, and Ruvalcaba, Yanet, Ibid

<sup>&</sup>lt;sup>13</sup> 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.<sup>14</sup>

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 "liferuining," "hell on earth," and "a nightmare . . . which destroyed everything." <sup>15</sup>

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%).<sup>16</sup>

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.<sup>17</sup> 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 explicit sexual images, where often the person (usually a female), who is pressured by another (usually by a male), to take and send explicit 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:

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

<sup>&</sup>lt;sup>15</sup> 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

<sup>&</sup>lt;sup>16</sup> The Cyber Civil Rights Initiative, Ibid

<sup>&</sup>lt;sup>17</sup> 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 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 explicit 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,

#### Argentina

Susana Chiarotti, Insgenar

#### Austria

Caroline Sander, Herzwerk direct services

#### Australia

Melinda Tankard Reist, Collective Shout
Anna Kerr, Feminist Legal Clinic Inc.
Jayneen Sanders, Educate2Empower
Lucimey Lima Perez, CatholicCare Tasmania
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

#### Colombia

Drisha Fernandes, Expert on men's VAWG & Victim Support

#### Croatia

Nela Pamukovic, Centre for Women War Victims

#### France

Catherine Goldman, Fondation Scelles Claudie Bougon Guibert

## Germany

Ingeborg Kraus, Psychologist Ulrike Rose-Maier, Stop sexkauf

#### Ghana

Frank Mackay Anim-Appiah, Freedom International

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

Genevieve Muenchhagen

Celeste S

Peta Wassell

Renee Chopping Zelda Senior

Angela B

Alison Roberts

Sue Wells

Rebecca H

Sallie Page

June Rojas Louise Woods

Marion Allaburton

Rachael McDonnell

Susan Bishop Cheryl Mathews Joy Waddingham

Kathleen Ryan Sarah Morrison

Bron Warner

Erica Churchill Kay Moncrieff

Chris Forder

Nathan Wilson

Dee Beriya

Vicki Johnston

Dana Row

Clare Hangan

Leticia Moreno

kali mackessy

Robert Dyball Clare Nixon

#### 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

## Kenya

Tobias Nauruki, Empowered Youth Coalition (EYC)-Africa

#### Latvia

Beata Jonite, Centrs MARTA

#### Lithuania

Egle Puidokaite, Klaipeda Social and Psychological Support Center

Kristina Misiniene, Center against Human Trafficking and Exploitation, Lithuania

# Luxembourg

**Cindy Martins** 

#### Mexico

Robin Mata

# Nepal

Anil Raghuvanshi, ChildSafeNet

#### New Zealand

Nicole Stephens, Stop Trafficking NZ

Percy Montoya Roger Coleman Stephanie Mitchell Simon Gilmour Susan Daniel Clinton Le Page Liz Mahanidis Nadine Low

Denise M Cameron

Kylie Virtue Elle Tino

Glynis Cochrane michael Lilburn Erika Meijbaum Gemma Salama

Michelle I Michael Dine Kaye Johnston Nola Drum Donelle S Ruth Dukes

Naomi Thomas

Lisa Brick Marie Francis Ann Fair

Lauren Thong

Sharon Bonnington Graham McDonald

Marg Laing Kayleen Hullah Frances Elliott Peter Grimes Tanya Millar Caitlin B

Angelo Materia Michael Perry

Elizabeth Churchward

Janet Grevillea

Jazz S

Kevin Cosgrove
Trevor Tremain
David Folland
Yvonne Riznyczok
Melissa Haigg
Kristen Lappan
Christine Bennett

Richard Andrew Pam Norris Ma Piripi Hilary Lumb

# Nigeria

Elizabeth Oyifie Omale Roseline Aghatise

## Norway

Agnete Str $\sqrt{\prod}$ , Women's Front of Norway

#### Serbia

Tanja Ignjatovi fá, Autonomous Women's Center

#### Sierra Leone

Michael Luseni, Economic Empowerment and Human Rights

#### **South Africa**

Eugene Mashamba, South Africa's Film and

Publication Board (FPB)

Gloria de Gee gloria, Umgeni Community

**Empowerment Centre** 

Grizelda Grootboom, Survivor Exit Program

Catherine Restiau, National Freedom

Network

Shaheda Omar, Teddy Bear Clinic

Manisha Ramnarain, Tshwane Leadership

Foundation

Susara Nortje, AmazingBrainz Early

Childhood Development

Tershia de Klerk, Joseph Movement

Allison Baatjes, Act Africa Last M, S-CAPE Safe House Alta McMaster, Epic Foundation

Desiree Hoppenstein, General Practitioner

Colin Masurik
Tracy King
Marina Reyneke
Chantel Farquharson
Nicolleen Govender
Marx-Lenin Nagan
Brent Frieslaar
Pierre Joubert

Merilyn Muscat James Wheeler Linda Eglington Maaike van Herp Meredith Mullaly Janice Gorton

I Day

Kirsty McKenzie Veronique Douillard

Amanda Keel Helen Dawson

Angela Dillon-Murray

Sarah Grosvenor Stacy Dickford

Mel Cr

Linda Dal Castello

Celia Whittle Liz Schroeder Phil Harvie Maria A

Lynnette Bengtson

Surya Silva

Elizabeth Hargreaves

Robyn Sykes Stephen Bullied Louise Fisher Peter Neesham Marie-Louise Drew

Bev Schneider Amy Soutter Rebecca Everett Marina Byrne

Foiza Nasim Robert Kerry

Monique Monique

Kerrie Bain Verity Thomson Pamela Bedford Sarah Soper Clive Ellis

Clive Ellis Tegan J

June Winsome Smith

Lynne Davis Fiona Thompson Olove McIntsh Katrina Lyon Caryn Turnbull
V Balogun
Christine Doubell
Christené Gaitskill
Jacques Rothmann
Ansie Wayland
Nonsikelelo Ngcobo

#### Sweden

Sian Sylvester

Nathalia Guaje, Swedish Women's Lobby Zandra Kanakaris, 1000 Möjligheter Polana Kovac, Drustvo-Kljuc Emelie Berglund

#### **Switzerland**

Nana Mallet, End Demand Switzerland Elisabeth Rupp, Perla Organization

#### **Tanzania**

Francesco Chearmoung

# **United Kingdom**

Julie Swede, Space International
Nina Humphries, UKFeminista
Anna Fisher, NordicModelNow
Vanessa Morse, CEASE UK
Elly Hanson, Clinical Psychologist
Darryl Mead, The Reward Foundation
Haley McNamara, International Centre on
Sexual Exploitation
Jennifer Drew
Anne Agostini

L Baker Neia G Sarah Quick Sally Fereday Sue Riley Miriam Osner

# **United States of America**

Judge Judy Harris Kluger, Sanctuary for Families Jeanette Westbrook, Survivor Katelynn Spencer, Survivor Rachel Wood Peter Marshall Rachel Handelman

Judi Lister

Melanie Nguyen Lena de Boer Marie Beatty Joan Apthorp Margaret Ochsner Selina Nivellle Jon Woods

Charry Hemmings

Simon Lanza Mimi Heart Liz Kakoschke Alison Maldonado

Karen Vella Jenni Avenell Ainsley Stock Xanthe Daly Eleanor Bentham

# Belgium

Anna Zobnina, European Network of Migrant

Women

**Brigitte Spiering** 

#### Canada

Glendyne Gerrard, Defend Dignity Barbara Renaud, Vancouver Collective

Against Sexual Exploitation
Camille Beausejour, BridgeNorth

Brian Rae, Buyers Resist

Megan Walker, Retired from the London

Abused Women Centre

Lina MacDonald, Persons Against Non-State

Torture

Casandra Diamond Heela Bangash Tony Lee

Amanda Paananen Sandra Harrison Andrea Heinz

Debbi O, Shaughnessy

Natasha Tso Marvy Wheale Taina Bien-Aime, Coalition Against

Trafficking in Women

Twiss Maynard Butler Butler, Coalition

Against Trafficking in Women

Autumn Burris, Survivors for Solutions Linda Blackiston, Institute for Shelter Care Eleanor Gaetan, Human Trafficking Subject

Matter Expert (SME)

Dawn Hawkins, National Center on Sexual

**Exploitation** 

Lois A. Herman, WUNRN-Women's UN

Report Network

Gracie Hill, YouMySister

Winifred Doherty, Good Shepherd International Justice Peace Office Holly Hart, National Organization for Women, Liberation Front Women, Declaration International/USA

Karen Ingala Smith, NIA Ending Violence

Lily Y

Avery Stonely Mary Zepina Kristina Dobosz

Chris Sol

Cheyenne Edwards Amanda Smith Ann Hansen Marlene Adam Wendy McKillop Yvonne Manly Dianne Post Deborah Sucich

Phil Wise

Yomayra Torres Cindy Kuro

Carole Anne Soong Sarah M meadows Rachel A. Heidorf Cherie Devivi Janine McDonald

Rebekah Riseborough Arun Raja Pookote

Janet Sasaki

Laura Ramirez

S Barton
Benedict Bertrand
Stephan Lorrain
Julia Biersteker
Louann McCurdy
Monica Popaz
Carolin Pugh-Roberts
Rachel Rock
Nancy Brown