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April 8, 2024

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

Re: Reddit's placement on the 2024 Dirty Dozen List for hosting image-based sexual abuse, child sex abuse material, and promoting violence against women

Dear Mr. Huffman:

We write to inform you that **Reddit will once again be named, for the fourth 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 Wednesday, April 10, 2024.

Reddit is known as one of the most popular discussion platforms on the Internet right now, with about [73 million active users each day](#).¹ In 2023, Reddit averaged [1.2 million posts and 7.5 million comments daily](#).² And in just six months, from January to June 2023, Reddit users [exchanged 472,984,011 personal messages](#).³

Since its inception, Reddit has been known as a hub for multiple forms of sexual abuse and exploitation: child sex abuse material posting and trading, image-based sexual abuse, sex trafficking, and child sexual exploitation. Reddit has continued to allow the proliferation of this content and behavior despite its public attempts at cleaning up its image ahead of going public on March 21, 2024.

The following reports from researchers and online safety organizations demonstrate the wide-ranging sexual exploitation occurring across Reddit:

⇒ The number of links advertising “undressing apps” [increased more than 2,400% across social media platforms like Reddit and X in 2023](#) (Graphika, 2024).⁴

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- ⇒ [#3 app flagged for severe sexual content](#) (Bark, 2023).⁵
- ⇒ Reddit is [one of the top eight social media platforms](#) used to search, view, and share child sexual abuse material (CSAM) and top eight social media platforms used to establish contact with a child (Suojellaan Lapsia, Protect Children, February 2024).⁶
- ⇒ Percentage of minors with self-generated child sexual abuse material ([SG-CSAM](#)) [experiences that use Reddit at least once per day](#): 34% of minors who have shared their own SG-CSAM; 26% of minors who have reshared SG-CSAM of others; 23% of minors who have been shown nonconsensually reshared SG-CSAM (Thorn, November 2023).⁷
- ⇒ [One of the top ten online platforms where teens report having seen pornography](#) (UK Children’s Commissioner, 2023).⁸
- ⇒ Australian eSafety Commissioner research identified [Reddit as one of the most popular social media](#) sites where young people report seeing pornography (Australian eSafety Commissioner, 2023).⁹

Reddit’s recent [partnership with Google](#), disclosed in the March 2024 S-1 filing with the SEC, adds another layer of concern.¹⁰ This deal, which is expected to generate \$66.4 million in revenue by the end of 2024, [allows Google to train AI models using Reddit’s content](#).¹¹ This arrangement is particularly alarming, given Reddit’s historical challenges with proactively identifying and eliminating sexually explicit content, including abusive and illegal imagery. Despite new policies banning [third party and API access to sexually explicit content](#),¹² without stringent safeguards to filter out image-based sexual abuse and CSAM, the **potential for Google’s AI models to be trained on the pervasive amount of sexually exploitative and potentially illegal material on Reddit is much too high.**

NCOSE finds this move incredibly concerning, especially considering Reddit’s lack of effective content blurring measures and the absence of age or consent verification mechanisms. The platform’s approach to moderation and its partnership with Google highlight profound shortcomings. These issues not only jeopardize efforts to ensure online safety but also position Reddit as a platform that facilitates the spread of sexual exploitation and abuse, raising serious questions about its [newly proclaimed](#) viability as a ‘safe and responsible’ digital space.¹³

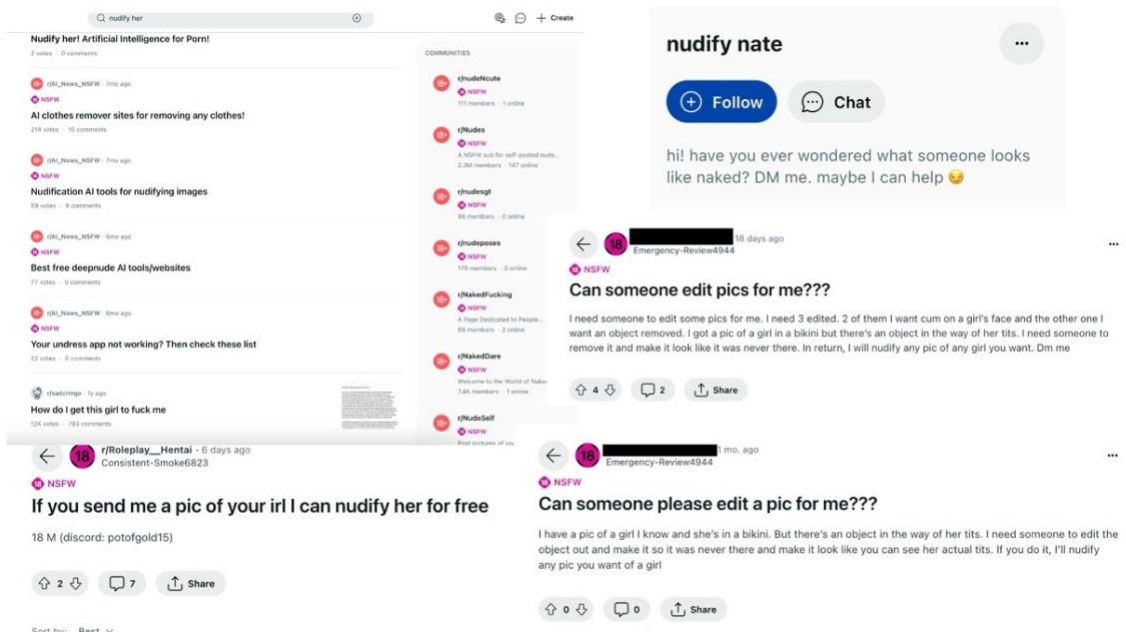
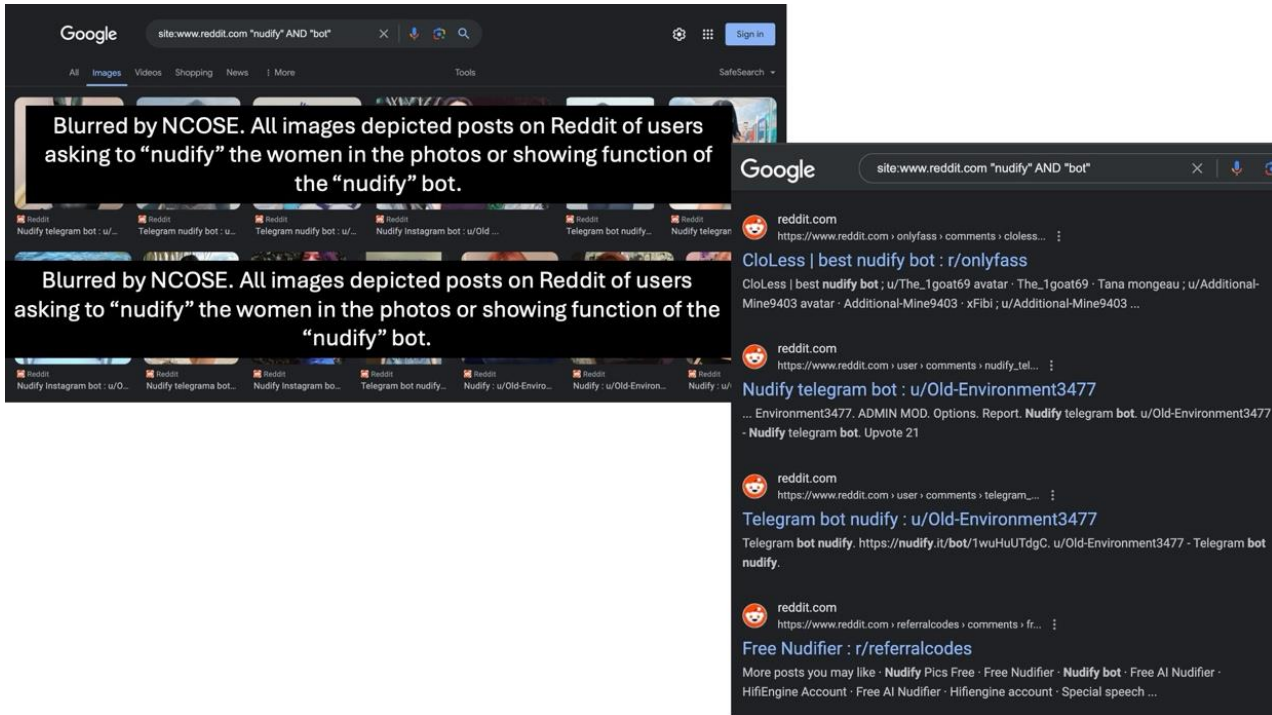
We do not need to reiterate the evidence in detail, as you have been notified many times, and we feel confident that you are well aware of the dangers occurring on your platform. Until you radically reform your current policies to ensure that reports are acted on, and that age and consent verification is implemented, NCOSE will continue elevating the destructive realities of Reddit’s platform to law enforcement, policymakers, the press, and parents. Most importantly, we will continue to remind your potential investors that Reddit is a dangerous and risky investment.

Image-Based Sexual Abuse and AI-Facilitated Sexual Abuse and Exploitation

Despite Reddit’s update to [Rule 3](#) in June 2023,¹⁴ the new policy literally titled, “[Never Post Intimate or Sexually Explicit Media of Someone Without Their Consent](#),”¹⁵ which aimed to include deepfakes and AI-generated explicit content featuring identifiable individuals, a critical gap remains: Reddit’s failure to tackle AI-generated pornography of adults, unless it depicts identifiable persons, starkly overlooks the fundamental issue of consent. Reddit’s historical negligence of content moderation and permissiveness for “[gray area content](#)”¹⁶ has allowed exploitative and potentially illicit content to proliferate.

For example, December 2023 research found a [2,400% surge in ads for “undressing apps,”](#)¹⁷ despite Reddit’s [policies against non-consensual content](#)¹⁸ and [sexually explicit ads,](#)¹⁹ underscoring the platform’s inadequacies in curbing image-based sexual abuse.

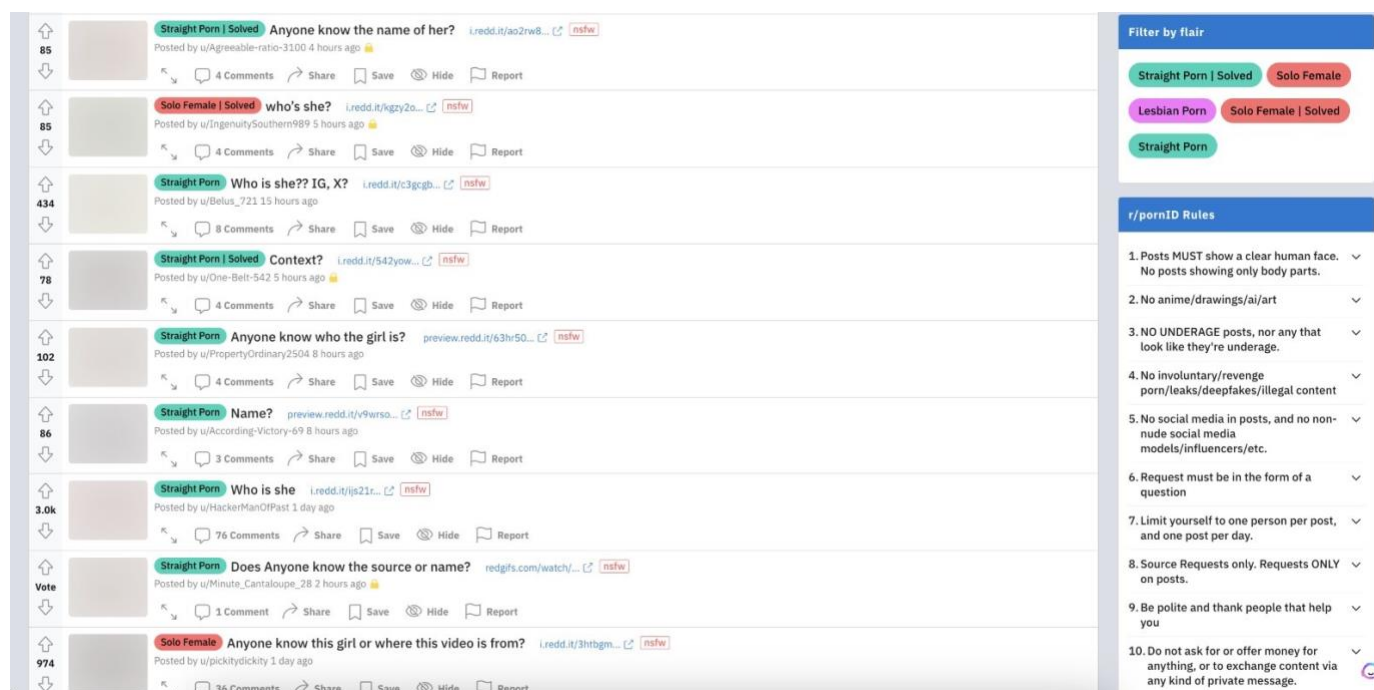
Reddit has also failed to properly moderate content depicting, soliciting, or offering to create “deepfake” pornography or “nudified” images of private individuals and celebrities. In fact, many posts on Reddit even monetize creating sexual “deepfake” and “nudified” images of any person someone submits.



Reddit also has a number of communities dedicated to the creation and distribution of AI-generated pornography. A dedicated AI-generated pornography community NCOSE reported on in 2023 [grew by almost 3x the number of subscribers in a year from 48,000 to 128,000 members](#).²⁰ This exploitative tool amassed over 15 million “donated” sexually explicit and pornographic images to train their technology, and posts AI-generated pornography by the hour on Reddit. During its soft launch in July 2023, the Unstable Diffusion CEO and Co-Founder stated the [model was generating over 500,000 images a day](#).²¹ A 2023 Forbes article also highlighted the [absolute explosion of AI-generated pornography on Reddit](#),²² indicating that the platform’s ambiguous policies have allowed it to flourish.

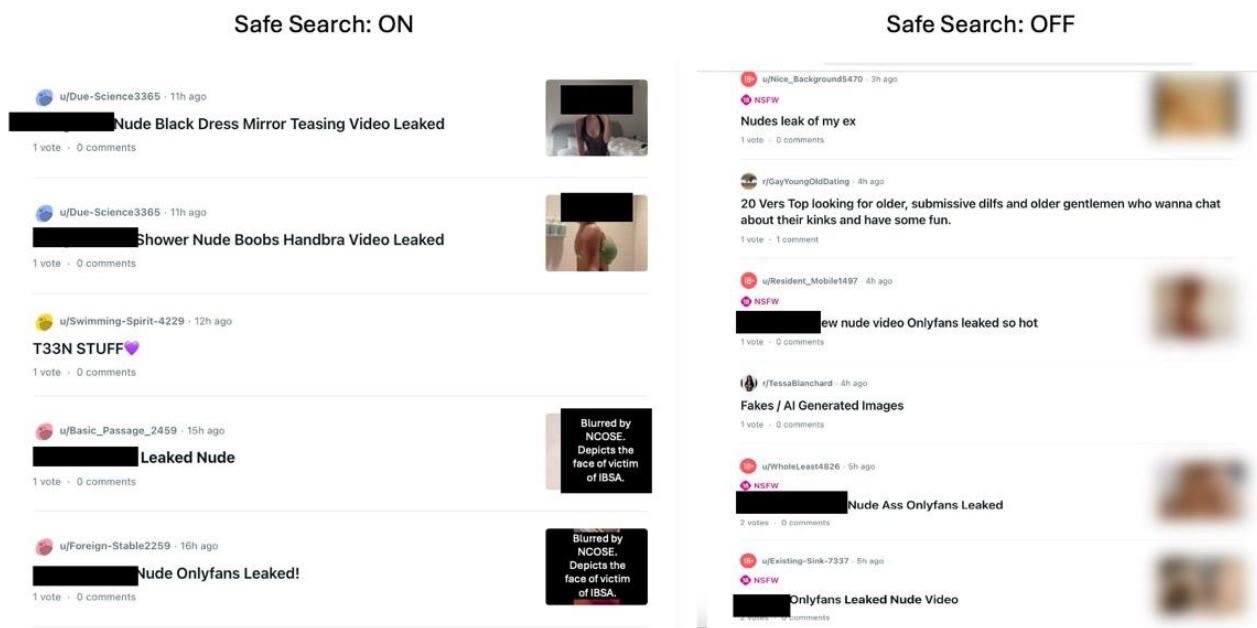
Although Reddit has improved blurring mechanisms for sexually explicit content, **blurring non-consensual sexually explicit imagery does not make the content any less “non-consensual.”** This feature is *easily* bypassed, allowing Redditors to simply click on the blurred post to view the image. NCOSE is deeply concerned by the growth of subreddits dedicated to non-consensual sharing of sexually explicit images, not only persisting but growing.

The subreddit r/PornID (dedicated to identifying women in sexually explicit imagery and videos) increased in subscribers from **1.3 million in 2023 to 1.7 million in 2024**. Although the thumbnails are blurred, this does not negate the fact that this subreddit, like dozens of others NCOSE researchers found, is dedicated to sharing non-consensual content. Further, this subreddit encourages posting of non-consensual content for the purpose of identifying the women in such content, potentially resulting in other forms of abuse such as doxing, stalking, and harassment.



The fact that NCOSE researchers *easily* found dozens of subreddits containing language indicating nonconsensual content as the main focus, with blurred and unblurred imagery, is also indicative of Reddit’s failure in enforcing its newly updated policies.

Searches with Reddit’s “Safe Search” Content Filter ON returned posts containing non-consensual content or links to such content. Further, when this filter is ON, sexually explicit content is openly shown as the blurring filter only functions when Safe Search is OFF. For example, the search “leaked nudes” returned literally hundreds of posts from Redditors soliciting or offering leaked sexually explicit imagery of women from OnlyFans, ex-partners, “snapchatsluts,” and more in the last year alone. Searches for downblousing similarly returned an alarming number of results despite this being a known IBSA term and prominent form of abuse.



Considering Reddit’s historic negligence in moderating sexually explicit content, it is deeply concerning that this content is still slipping through Reddit’s ‘improved’ filters.

Child Sexual Abuse Material and Sexualization of Minors

NCOSE [acknowledges](#) that in June 2023,²³ Reddit took a step forward by announcing [updates to its Child Safety Policy](#)²⁴ ([Rule 4](#)),²⁵ including comprehensive measures against the sexualization of children – something NCOSE has found to be pervasive across the platform. These measures ranged from banning suggestive images of children, including those that are AI-generated, to prohibiting behaviors that exploit minors.

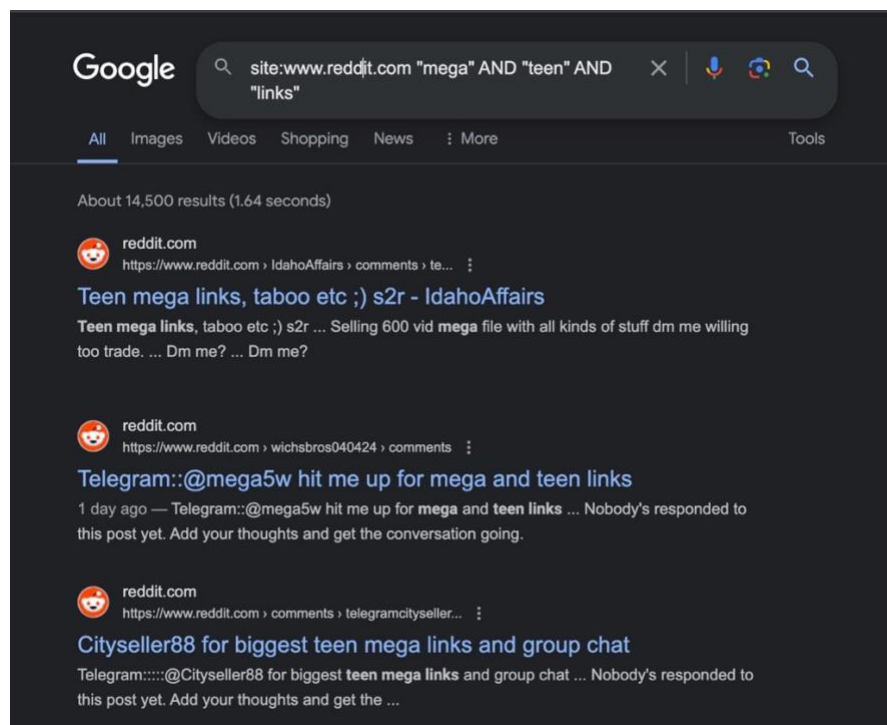
However, despite these updated regulations and Reddit’s efforts to enhance moderation, tangible enforcement has been lacking. Recent research underscores the persistent availability of CSAM, content that sexualizes minors, and AI-generated sexually explicit and suggestive content of minors on Reddit. For example, research conducted by the Stanford Internet Observatory in December 2023 [found child sexual abuse material \(CSAM\) originating on Reddit](#) had been used to train AI models such as Stable Diffusion.²⁶ Further, the actions taken by the Australian eSafety Commissioner – one of the leading

authorities on online child safety in the world – who [issued a legal notice to Reddit](#) (amongst five other platforms) requesting a detailed inquiry into Reddit’s practices to detect and remove CSAM from the platform, suggests additional concern.²⁷

Unfortunately, we have yet to see substantial evidence of comprehensive enforcement since Reddit updated their child safety policy:

- With Safe Search **ON**, NCOSE researchers found that the search “mega teen leaks” and “mega links” **returned over 100 results in the last 60 days**, most openly soliciting or searching for links demonstrating high indication of child sexual abuse material (CSAM). (NCOSE, April 2024).
- Content attached to posts from the above search results contained imagery suggesting child sexual abuse between adults and minors. One post titled, “MEGA links telegram::@cum_file5,” contained an image with the text, “Boys for Sale,” depicting a fully clothed adult man covering the mouth and grabbing the genital region of an underage boy, who was wearing only his underwear and had visible red marks of abuse across his chest (NCOSE, April 2024).
- NCOSE researchers conducted a Google search for “site:www.reddit.com ‘mega’ AND ‘teen’” and received **14,500 results of content on Reddit containing high indications of child sexual abuse imagery sharing, trading, and selling** (NCOSE, April 2024).
- NCOSE researchers analyzed the top 100 pornography subreddits (what is tagged on Reddit as “NSFW”) and found numerous examples of child sexualization and/or possible indicators of child sexual abuse material—including titles like “xsmallgirls” and references to flat-chestedness (NCOSE, July 2023).

Search results conducted on April 5, 2024, for “site:www.reddit.com ‘mega’ AND ‘teen’” returned 14,500 results of extremely concerning content.



In addition to this, NCOSE researchers have found artificial / illustrated pornography depicting bestiality and even illustrated bestiality involving child-like figures.

In 2023, NCOSE exposed a subreddit dedicated to AI-generated bestiality imagery, some of which depicted child-like figures. While the original subreddit we reported was removed, the owner *EASILY* made a new account and subreddit with the same title – and even admitted to doing so (proof available upon request). The new subreddit is still active as of April 5, 2024, and contains imagery depicting bestiality involving child-like figures and posts of users sharing their experiences of *actual* bestiality. It is horrendous that Reddit allows this clearly nefarious and potentially illegal content to remain.

It appears that Reddit knowingly allows CSAM, sex trafficking, and pedophilic activity to thrive on its platform. Below are details of just a few cases in 2023 and 2024:

- On February 2, 2024, an [Ashland, KY man was charged](#) with the sharing and distribution of nude images of young boys aged 10-14. He had distributed them to as many as 20 others on Reddit.²⁸
- On January 25, 2024, a 37-year-old [Dover, NJ man was arrested for possessing CSAM](#) and uploading it onto Reddit. The initial report was made following a NCMEC CyberTip, as reported to the CyberTipline.²⁹
- In November 2023, [a former associate pastor of the Baptist church and Chaplain at the Oklahoma State Penitentiary was arrested](#) for engaging in sexually explicit chats with minors on Reddit and possessing CSAM.³⁰
- On August 30, 2023, an [Albert Lea, Minnesota man pleaded guilty to four counts of possession of CSAM](#) after admitting to buying CSAM off of Reddit. He was arrested based on a CyberTip from NCMEC.³¹
- In August 2023, a [Glendale, Wisconsin police officer was fired and arrested for posting CSAM on Reddit](#). He had at least six images in his possession at the time of the arrest.³²

Such findings point to a troubling disconnect between Reddit’s stated policies and the platform’s ability to enforce them effectively. The continued presence of subreddits that sexualize minors, found even with the Sensitive Content filter enabled, starkly illustrates the challenges Reddit faces in its quest to safeguard against the exploitation of minors, casting doubt on the platform’s ability to provide a safe and secure online environment.

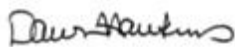
Reddit is dangerous by design. For almost two decades, Reddit has failed to implement effective and meaningful policies, touting free speech and privacy over the safety and well-being of its users – despite the overwhelming evidence of harmful and violent behavior facilitated on your platform.

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.**

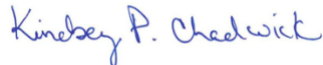
3. **Make Reddit 17+ and prevent minors from accessing your platform** – both Apple App Store and Google Play age ratings for Reddit are 17+ and M for “Mature,” respectively. *Given that pornography is so easily accessible and other harms are rampant, children should not be on Reddit; asking Reddit for parental controls or other safety measures would be like asking Pornhub to make itself kid-friendly.*
4. **Ban all forms of AI-generated pornography on Reddit** – Reddit has no way of confirming age and consent verification of images used in training sets or the individuals depicted in generated images. Reddit’s June 2023 clarification to only ban AI-generated pornography of identifiable adults is another example of purposefully creating ambiguous policies providing ample space for exploitation and loopholes of such policies.
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.

Thank you for your attention,



Dawn Hawkins

CEO



Kindsey P. Chadwick

Interim President

Cc:

Jen Wong, Chief Operating Officer

Chris Slowe, Chief Technology Officer

Roxy Young, Chief Marketing and Consumer Experience Officer

Pali Bhat, Chief Product Officer

Shariq Rizvi, Executive Vice President of Ads Monetization

¹ Reddit, Inc., “Amendment No. 3 to Form S-1 Registration Statement,” United States Securities and Exchange Commission, March 19, 2024, <https://www.sec.gov/Archives/edgar/data/1713445/000162828024011789/reddit-sx1a3.htm>.

² Ibid.

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- ²³ NCOSE, “Reddit Takes One Step Forward, One Step Back,” *National Center on Sexual Exploitation*, July 20, 2023, <https://endsexualexploitation.org/articles/reddit-takes-one-step-forward-one-step-back>.
- ²⁴ “Do Not Share Sexual or Suggestive Content Involving Minors, or Engage in any Predatory or Inappropriate Behavior with Minors,” Reddit, last modified September 28, 2023, <https://support.reddithelp.com/hc/en-us/articles/360043075352-Do-not-share-sexual-or-suggestive-content-involving-minors-or-engage-in-any-predatory-or-inappropriate-behavior-with-minors>.
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- ²⁶ David Thiel, *Identifying and Eliminating CSAM in Generative ML Training Data and Models* (Stanford Internet Observatory, December 21, 2023), https://stacks.stanford.edu/file/druid:kh752sm9123/ml_training_data_csam_report-2023-12-21.pdf.
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