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17 Attorneys for Plaintiff

18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 JANE DOE on behalf of herself and all
21 others similarly situated,

22 Plaintiff,

23 v.

24 REDDIT, INC.,

25 Defendant.

Case No. 8:21-cv-00768

CLASS ACTION

**COMPLAINT FOR VIOLATION
OF FEDERAL SEX
TRAFFICKING LAWS**

JURY TRIAL DEMANDED

1 NATURE OF THE ACTION

2 1. Plaintiff brings this proposed class action for damages and injunctive
3 relief on behalf of herself and all persons who were under the age of 18 when they
4 appeared in a video or image that has been uploaded or otherwise made available for
5 viewing on any website owned or operated by Defendant in the last ten years.

6 2. As alleged below, over the course of the last decade, Reddit has
7 knowingly benefited financially from videos and images posted to its website(s)
8 featuring victims who had not yet reached the age of majority. Rather than address
9 this horrifying and pervasive trend, for years, Reddit has taken virtually no action.

10 3. Prior to 2011, Reddit did not even have a policy banning child
11 pornography. It was only after Reddit came under fire for subreddits like /r/jailbait—
12 a prominent subreddit that included minors engaged in sexual acts—that it
13 begrudgingly instituted a policy that child pornography was banned from its site.¹

14 4. However, despite Reddit’s ability to enforce this policy and
15 awareness of the continued prevalence of child pornography on its websites, Reddit
16 continues to serve as a safe haven for such content. Indeed, although child
17 pornography is inconsistent with the “policy” announced by Reddit, there are a
18 troubling number of instances of child pornography featured on the site. Reddit
19 claims it is combating child pornography by banning certain subreddits, but only after
20 they gain enough popularity to garner media attention.

21 5. What’s more, Reddit has taken no action to actually prevent users
22 from uploading child pornography in the first place. Posting material on Reddit
23 requires no age verification of any kind. A user simply chooses a subreddit to which
24 they intend to post, writes the text of the post, uploads an image and/or video and
25

26 ¹ https://www.reddit.com/r/blog/comments/pmj7f/a_necessary_change_in_policy/;
27 [https://www.reddit.com/r/TheoryOfReddit/comments/58zaho/the_accuracy_of_voat
28 _regarding_reddit_srs_admins/d95aof t/](https://www.reddit.com/r/TheoryOfReddit/comments/58zaho/the_accuracy_of_voat_regarding_reddit_srs_admins/d95aof t/)

1 clicks “post.” The user is not even required to click a checkbox confirming that the
2 post complies with Reddit’s policies. Rather, there is a small note on the site that
3 says: “Please be mindful of reddit’s content policy and practice good reddiquette.”

4 6. The reason for Reddit’s inaction is simple: greed. Reddit has chosen
5 to prioritize its profits over the safety and welfare of children across the globe. As
6 regulating child pornography means dampening traffic to its websites, which is what
7 drives Reddit’s profits.

8 7. Reddit’s decision is not only upsetting, it is illegal. As the Trafficking
9 Victims Protection Reauthorization Act (TVPRA) makes clear, it is unlawful for any
10 person or entity to knowingly (whether because it knew or should have known)
11 benefit financially from sex trafficking, which includes any instance where a person
12 under the age of 18 is caused to engage in a commercial sex act. That is precisely
13 what Reddit has done here—on an incredible scale.

14 **THE PARTIES**

15 8. Plaintiff Jane Doe No. 1 is an individual who is now the age of
16 majority under U.S. and California law. She is a United States citizen who resided
17 within this judicial district at all relevant times alleged herein. She is also a victim
18 of child sex trafficking and child pornography, as alleged herein.

19 9. Plaintiff Jane Doe No. 1 requests that this Court permit her to proceed
20 under a pseudonym. If required by the Court, she will seek permission to proceed
21 under this pseudonym. Plaintiff’s anonymity is necessary to preserve privacy in a
22 matter of sensitive and highly personal nature given that the allegations detailed
23 herein relate to Plaintiff’s experience as a victim of child sex trafficking and child
24 pornography. Plaintiff’s sensitive and personal experiences were not the result of
25 any voluntary undertaking on her part, and neither the public, nor the Defendant, will
26 be prejudiced by Plaintiff’s identity remaining private.

27 10. Defendant Reddit, Inc. is a corporation organized and existing under
28 the laws of the state of Delaware, with an established place of business located at

1 1455 Market Street, Suite 1600, San Francisco, CA 94103. Upon information and
2 belief, Reddit can be served with process by serving its registered agent for service
3 of process in the State of California, Corporation Service Company, d/b/a CSC-
4 Lawyers Incorporating Service, at 2710 Gateway Oaks Drive, Suite 150N,
5 Sacramento, CA 95883.

6 **JURISDICTION AND VENUE**

7 11. This Court has original subject matter jurisdiction pursuant to 28
8 U.S.C. § 1331.

9 12. Some of the claims asserted herein arise under 18 U.S.C. § 1595(a).
10 Pursuant to Section 1595(a), “an individual who is a victim of a violation of this
11 chapter” may bring a civil action in “an appropriate district court of the United States
12 and may recover damages and reasonable attorneys fees.”

13 13. The court may properly exercise personal jurisdiction over Reddit.
14 Reddit maintains minimum contacts with this District, such that maintenance of this
15 lawsuit does not offend traditional notions of fair play and substantial justice.

16 14. Reddit has offices in this State and this District, conducting business
17 directly related to the websites at issue in this case. Specifically, Reddit is a
18 corporation organized and existing under the laws of the state of Delaware, with an
19 established place of business located at 6022 Wilshire Blvd., Los Angeles, CA
20 90036.

21 15. Jurisdiction is further appropriate under 18 U.S.C. §1596, which
22 provides for jurisdiction over any offender, in addition to any “domestic or extra-
23 territorial jurisdiction otherwise provided by law,” where the offender is “present in
24 the United States, irrespective of the nationality of the alleged offender.”

25 16. Venue is proper in this district pursuant to 28 U.S.C. § 1391 because
26 a substantial part of the events or omissions giving rise to the claims asserted in this
27 action occurred in the judicial district where this action was brought. Venue is also
28

1 appropriate in this district because defendant Reddit maintains a place of business in
2 this district.

3 **I. SEX TRAFFICKING AND CHILD PORNOGRAPHY ON THE**
4 **INTERNET**

5 17. Sex trafficking and the proliferation of child pornography are rapidly
6 growing problems in the United States. Human trafficking is a 150-billion-dollar
7 industry. Out of an estimated 40.3 million victims, 25% are children.²

8 18. The rise of the Internet and e-commerce has facilitated the rapid
9 growth of the market for child pornography online. The Internet and digital
10 technologies have created new models for sexual exploitation and trafficking, which
11 are hidden and protected by cryptocurrency, laundered money, foreign Internet
12 servers and anonymous messaging applications. The Child Rescue Coalition alone
13 has identified 71 million unique IP addresses worldwide sharing and downloading
14 sexually explicit images and videos of children.³

15 19. The Internet is the number one platform for customers to buy and sell
16 sex with children in the United States. Many sex buyers use the Internet to identify
17 and connect with sellers and victims. Traffickers, in turn, use online networks, social
18 media, websites, and dating tools to disguise their identities while identifying
19 potential victims, which reduces traffickers' chances of being caught by law
20 enforcement.

21 20. Americans are some of the top consumers and producers of child
22 pornography. According to the U.S. Department of Justice, "Federal law defines
23 child pornography as any visual depiction of sexually explicit conduct involving a
24 minor (persons less than 18 years old)."

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26

27 ² <https://coil.com/p/RileyQ/Child-Trafficking-What-You-Need-To-Know/mj4WEwhW7>

28 ³ *Id.*

1 21. According to the National Center for Missing & Exploited Children,
2 their cyber tip line has received more than 50 million reports of suspected child
3 exploitation from 1998 through 2019, with 18.4 million reports in 2018 alone. The
4 vast majority of these reports contain child sexual abuse material, most of which is
5 on the Internet. North America now hosts 37% of child sexual abuse content and
6 children under the age of 10 now account for 22% of online child porn consumption,
7 while 10-14-year-olds make up 36%.⁴

8 22. The link between sexual exploitation and pornographic videos is
9 undeniable. According to an article by Melissa Farley, 49 percent of sexually
10 exploited women say pornographic videos of them were made while they were being
11 sold for sex.⁵

12 **II. THE TVPA AND TVPRA**

13 23. In response to the growing problem of sex trafficking, in 2000,
14 Congress passed the Trafficking Victims Protection Act (“TVPA”), which laid the
15 groundwork for the federal response to human trafficking.

16 24. In 2003, Congress reauthorized the TVPA and passed the Trafficking
17 Victims Protection Reauthorization Act of 2003, Pub. L. No. 108-193, § 4(a)(4)(A),
18 117 Stat. 2875, 2878 (2003) (“TVPRA”). Under the TVPRA, trafficking victims can
19 sue their traffickers in federal court.

20 25. In 2008, Congress amended the TVPRA to make it easier for victims
21 of trafficking violations to bring civil suits. First, the civil remedy was expanded to
22 include enterprise liability. It was likewise expanded to include anyone who
23 “knowingly benefits, financially or by receiving anything of value from participation
24

25 ⁴ <https://www.prnewswire.com/news-releases/enough-is-enough-calls-on-doj-to-investigate-mindgeek-for-a-trifecta-of-potential-us-law-violations-child-abuse-material-trafficking-videos-and-obscene-content-301196447.html>

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27 ⁵ “Renting an Organ for Ten Minutes: What Tricks Tell Us about Prostitution, Pornography, and Trafficking,” in *Pornography: Driving the Demand in International Sex Trafficking*, ed. David E. Guinn and Julie DiCaro (Bloomington, IN: Xlibris, 2007), 145.

1 in a venture which that person knew or should have known has engaged
2 in an act in violation of this chapter.” 18 U.S.C. § 1595(a). Second, Congress
3 expanded the statute’s reach to include extraterritorial jurisdiction for certain
4 trafficking offenses. *Id.* The statute of limitations is ten years, or ten years after the
5 victim turned 18 if the victim was a minor. *See id.* § 1595(c).

6 26. Commercialization of sex acts involving minors is a violation of the
7 TVPRA. Under the TVPRA,

8 (a) Whoever knowingly—

9 (1) in or affecting interstate or foreign commerce, or within the special
10 maritime and territorial jurisdiction of the United States, recruits, entices,
11 harbors, transports, provides, obtains, advertises, maintains, patronizes, or
12 solicits by any means a person; or

13 (2) benefits, financially or by receiving anything of value, from participation
14 in a venture which has engaged in an act described in violation of paragraph
15 (1), knowing, or, except where the act constituting the violation of paragraph
16 (1) is advertising, in reckless disregard of the fact, that means of force, threats
17 of force, fraud, coercion described in subsection (e)(2), or any combination of
18 such means will be used to cause the person to engage in a commercial sex
19 act, or that the person has not attained the age of 18 years and will be caused
20 to engage in a commercial sex act, shall be punished as provided in
21 subsection (b).

22 18 U.S.C. §1591(a). Under §1595(a), not only perpetrators who act “knowingly”
23 under §1591, but also “whoever knowingly benefits, financially or by receiving
24 anything of value from participation in a venture which that person knew or should
25 have known has engaged in an act in violation of this chapter” is civilly liable.

26 27. Reddit knowingly benefits from lax enforcement of its content
27 policies, including for child pornography. By allowing sensational and illegal content
28 to be posted on Reddit, it receives substantial advertising revenues, which is why

1 Reddit encourages moderators to leave as much content on the site as possible. By
2 failing to enforce its policies, Reddit facilitates the conduct of sex traffickers,
3 including those sex traffickers who deal specifically with children and child
4 pornography.

5 28. In 2018, in response to platforms like Reddit knowingly allowing
6 human trafficking to occur and profiting from it, Congress passed the Allow States
7 and Victims to Fight Online Sex Trafficking Act/Stop Enabling Sex Traffickers Act
8 (FOSTA/SESTA). Reddit previously had been shielded from liability for certain
9 offenses under Section 230 of the Communications Decency Act. The new statute,
10 however, makes it clear that platforms may be held liable for, among other things,
11 knowingly assisting, facilitating, or supporting sex trafficking, and amends the
12 Communications Decency Act’s Section 230 safe harbors to authorize enforcement
13 of federal or state sex trafficking laws.

14 **III. REDDIT’S BUSINESS MODEL**

15 29. Reddit is an enormously popular website. According to the New
16 Yorker, it is the fourth most popular website in the United States.⁶ And its popularity
17 only continues to grow. According to the Company’s 2020’s year in review, Reddit
18 has more than *52 million daily active users*, who have contributed to the 303.4
19 million posts, 2 billion comments, and 49.2 billion upvotes the Company recorded
20 just last year alone.⁷

21 30. Reddit bills itself as “the front page of the internet” and it is a social
22 platform where users submit posts that other users “upvote” or “downvote” based on
23 if they like it. If a post gets a lot of upvotes, it moves up in the Reddit rankings so
24 that more people can see it.

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27 ⁶ <https://www.newyorker.com/magazine/2018/03/19/reddit-and-the-struggle-to-detoxify-the-internet>

28 ⁷ <https://redditblog.com/2020/12/08/reddits-2020-year-in-review/>

1 31. As just one indication of the active role Reddit takes in shaping the
2 narrative presented on its websites, Reddit awards users “karma”, which “reflects
3 how much a user has contributed to the Reddit community by an approximate
4 indication of the total votes a user has earned on their submissions (‘post karma’) and
5 comments (‘comment karma’).”⁸

6 32. Reddit is a source for what’s new and popular on the Internet. Reddit
7 is made up of individual communities called subreddits, which have subscribers.
8 Each subreddit has its own page, subject matter, users, and moderators. Users post
9 stories, links, and media to these subreddits, and other users vote and comment on
10 the posts. Through voting, posts rise to the top of community pages and, by
11 extension, the public home page of the site.⁹

12 33. When users visit reddit.com, they can search for subreddits in a search
13 box provided by Reddit, which then applies a search algorithm that is defined by
14 Reddit.

15 34. Reddit also allows users to create subreddits. Every subreddit is
16 managed by one or more lay “moderators” who can dictate what types of content are
17 allowed in the subreddit. Reddit as a whole is governed by “administrators”, Reddit
18 employees who have the power to strip moderators of their privileges and ban
19 subreddits from the site. The primary role of Reddit administrators is to identify and
20 remove content that violates Reddit’s Content Policy, including in private messages
21 and subreddits.

22 35. Reddit also has an internal Trust & Safety team that allegedly
23 enforces its Content Policy against malicious users and takes down content violations
24 that may have urgent legal or safety implications.

25 36. Reddit also has an Anti-Evil internal security team, which allegedly
26 consists of back-end engineers who create automated software that flags content that

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28 ⁸ <https://reddit.zendesk.com/hc/en-us/articles/204511829-What-is-karma->

⁹ <https://reddit.zendesk.com/hc/en-us/articles/204511479-What-is-Reddit->

1 violates Reddit’s policies and sends that content to the Trust & Safety specialists,
2 who decide on subsequent moderation steps.

3 37. Reddit also claims to have developed two automated software tools
4 on its platform to moderate content: AutoMod and Crowd Control.

5 38. Reddit generates revenue through advertising and its ad-free premium
6 membership plan. In 2019, Reddit generated more than \$100 million in total ad
7 revenue, to say nothing of the revenue from its premium membership plan.¹⁰

8 **A. Reddit’s Business Embraces User-Generated Uploads of**
9 **Commercial Sex Acts**

10 39. Reddit depends heavily on its community of user-creators. In order
11 to upload a video or image to Reddit's site, all a person needs to do is click “post.”
12 The ease with which users can post makes it easy for sex traffickers to post images
13 and videos of underage victims and to solicit victims to participate in their sex
14 trafficking ventures. It also makes it easy for traffickers to share illegal content with
15 one another.

16 40. The entire process takes less than one minute. A user can post any
17 video or image of any person doing anything without any consequences. The user
18 does not have to demonstrate that he or she owns the copyrights in the content, that
19 those depicted in the content have consented, or that those depicted in the content are
20 of majority age.

21 41. Reddit also has no robust way of verifying user age. User age is
22 entirely self-reported and can be easily falsified. Reddit does not even ask for the
23 user’s date of birth during sign up even though it of course easily could.

24 42. Reddit has access to and the opportunity to view the videos and
25 images posted on its site. In a post regarding updates on Reddit’s site-wide rules

26 _____
27 ¹⁰ <https://www.investopedia.com/articles/investing/093015/how-reddit-makes-money.asp#:~:text=The%20company%20generates%20revenue%20through,users%20to%20share%20media%20content.>
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1 regarding involuntary pornography and the sexualization of minors, Reddit
2 moderator “landoflobsters” wrote: “Our view of subreddits is comprehensive and
3 involves analysis of some information that is not available to the public. We do not
4 take banning communities lightly and only do so in cases where we are confident that
5 it is essential to improving the safety of users.”¹¹

6 43. And yet Reddit famously refuses to take down content that violates
7 its policies largely because Reddit receives advertising revenue by maintaining
8 controversial yet popular content on the subreddits. Plaintiff’s own experience
9 highlights this problem. Despite her requests, Reddit would not immediately take
10 down the illegal videos and images depicting Plaintiff in a sex act as a minor. This
11 is despite Plaintiff’s outreaches to individual moderators informing them of the fact that
12 there was child pornography on their subreddits. There are many other instances of
13 users complaining on Reddit that when they reached out to administrators or
14 moderators complaining of child pornography, nothing was done. In 2012, a user
15 complained, “I emailed an admin about a preteengirls thread EXPLICITLY showing
16 photos of child porn.” He responded “thanks’ and “Nothing was done, NOTHING,
17 which is what I expected.”¹²

18 44. In the comments on the thread relating to Reddit’s site-wide rules
19 regarding sexualization of minors, many users commented on a number of subreddits
20 that featured child pornography, including one subreddit that featured a fourteen-
21 year-old and existed for almost four years. A moderator, elis8, commented on how
22 the subreddit r/starlets “was a source of all my troubles for years and it’s still up even
23 though it’s literally created to sexualize minors.”¹³

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25 ¹¹ https://www.reddit.com/r/announcements/comments/7vxzrb/update_on_sitewide_rules_regarding_involuntary/

26 ¹² https://www.reddit.com/r/technology/comments/pmbyc/somethingawfulcom_starts_campaign_to_label_reddit/c3qj2ww/

27 ¹³ The post was made three years ago, but the r/starlets subreddit has subsequently
28 been banned.

1 45. Another user explained that the subreddit “r/ratemeteen is basically a
2 virtual pedophile ring.”¹⁴

3 46. It was not until 2011 that Reddit even made a rule on its site that
4 sexual content featuring minors was not allowed. This was in response to a Gawker
5 article that found troves of child porn in forums like the subreddit known as /r/jailbait.

6 47. In 2011, Reddit user Michael Brutsch (operating under the handle
7 uu/Violentacrez) “set up more than a hundred sub-forums (called sub-reddits) where
8 users could share links and images of underage girls, rape fantasy and upskirt photos.
9 Brutsch shut down his Violentacrez username after *Gawker* reporter Adrian Chen
10 told him he knew his identity. Following the Gawker article, Reddit banned a series
11 of forums called out in that article that explicitly sexualized underage teens in their
12 names or descriptions. However, it did nothing to prevent similar content from
13 appearing on other existing or newly created forums. Put differently, it has done
14 nothing to actually eliminate, let alone prevent the future upload of, content featuring
15 underage teens despite knowledge and awareness that its site was being used as a safe
16 haven by child pornography traffickers.¹⁵

17 48. The same is true of content featuring even younger children. For
18 example, in 2014, Reddit came under fire when underage nude photos of Olympic
19 gymnast McKayla Maroney and MTV star Liz Lee were featured on the subreddit
20 /r/thefapping.¹⁶

21 49. As *The Washington Post* explained, while Reddit removed the photos
22 of Maroney and Lee, “two public figures with publicists and lawyers and a legion of
23 fans on alert for abuse,” it “doesn’t do much to help other young women whose
24 photos might end up questionably tasteful forums like /r/randomsexiness or

25 _____
26 ¹⁴ The post was made three years ago, but the r/starlets subreddit has subsequently
been banned.

27 ¹⁵ <https://www.washingtonpost.com/news/the-intersect/wp/2014/09/03/does-reddit-still-have-a-child-porn-problem/>

28 ¹⁶ <https://www.washingtonpost.com/news/the-intersect/wp/2014/09/03/does-reddit-still-have-a-child-porn-problem/>

1 /r/youngporn, where youthful photos are frequent, provenances are unknown and
 2 subjects' ages are rarely disclosed. Indeed, even though *The Washington Post*
 3 expressly called out the aforementioned subreddits as featuring underage women,
 4 they are still featured on Reddit's site, along with /r/BestofYoungNSFW,
 5 /r/Dirty18girls, /r/collegesluts, /r/TooCuteForPorn, /r/barelylegalteens, /r/18nsfw,
 6 /r/xsmallgirls, /r/YoungNiceGirls, /r/teensdirtie, /r/TeenBeauties,
 7 /r/YoungExoticHoes, /r/YoungGirlsGoneWild, and /r/teensdirty, all of which are
 8 identified on frontpagemetrics.com as some of the most popular subreddits on Reddit.

9 50. Even when a troubling subreddit gains enough publicity that Reddit
 10 has to remove it, it is only a matter of time before new subreddits pop up in its place.
 11 For example, after Reddit removed the /r/jailbait subreddit, /r/preteen_girls was
 12 formed, which featured images of 11 year old girls in bikinis with sexually explicit
 13 captions.¹⁷

14 **B. Reddit Knowingly Benefits From Child Sex Trafficking**

15 **1. Reddit Has Earned Enormous Profits**

16 51. Reddit generates substantial advertising revenue. Reddit has more
 17 than 1.34 trillion visitors each month.¹⁸ The number of visitors allows Reddit to make
 18 lots of money in advertising. In 2019, Reddit earned more than \$100 million in
 19 revenue from advertising alone, and that number has continued to increase.¹⁹

20 52. There's no question that financial considerations drive the content on
 21 Reddit's websites. Reddit collects money from ads on subreddits. The more
 22 controversial the subreddit, the more buzz it generates from users. Those subreddits
 23 with more user engagement drive advertising revenue and earn Reddit money.

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 25 ¹⁷ <https://culturedigitally.org/2012/03/limits-of-freedom-of-speech-reddits-child-pornography-problem/>

26 ¹⁸ <https://www.techradar.com/news/porn-sites-attract-more-visitors-than-netflix-and-amazon-youll-never-guess-how-many>

27 ¹⁹ <https://www.investopedia.com/articles/investing/093015/how-reddit-makes-money.asp#:~:text=The%20company%20generates%20revenue%20through,users%20to%20share%20media%20content.>

1 Reddit measures user engagement in a number of ways, including measuring the
2 number of upvotes and downvotes the posts receive, as well as the number of
3 comments generated by posts. In fact, far from being a passive observer, Reddit
4 awards its users “karma”, which “reflects how much a user has contributed to the
5 Reddit community by an approximate indication of the total votes a user has earned
6 on their submissions (‘post karma’) and comments (‘comment karma’).”²⁰ Having a
7 good karma means you are more likely to be featured by Reddit on its ever-evolving
8 homepage, which features those posts that rise to the top of community pages and,
9 by extension, the public home page of the site.²¹

10 53. Reddit also collects subscriptions from premium users of its websites.
11 Prices range from \$1.99 to \$99.99. For \$6.99/month, users can sign up for Reddit
12 Premium which offers an ad-free experience, 700 coins each month, and access to
13 the exclusive r/lounge community.²²

14 54. Reddit also has a currency (Coins) that users can use to award users
15 (also known as Gilding) for submissions and comments—regardless of the subject
16 matter. There are many ways in which users take advantage of these coins, which
17 include giving them to users to participate in their campaigns, giving them to
18 moderators of Subreddits users want to participate in in hopes they will be more
19 friendly with their moderation, and giving them through a contest, to drive more
20 exposure to a users’ Reddit profile.²³

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24 ²⁰ <https://reddit.zendesk.com/hc/en-us/articles/204511829-What-is-karma->

25 ²¹ <https://reddit.zendesk.com/hc/en-us/articles/204511479-What-is-Reddit->

26 ²² <https://protectyoungeyes.com/apps/reddit-parental-controls/>

27 ²³ <https://www.inc.com/brent-csutoras/how-you-can-use-reddits-new-premium-accounts-to-better-connect-with-your-audience.html#:~:text=Reddit%20Coins%20are%20a%20brand,submissions%20and%20comments%20they%20make.&text=In%20addition%20to%20showing%20a, and%20costs%20500%20Reddit%20Coins.>

1 55. Reddit also uses personalization preferences to further monetize users
2 by personalizing content and advertisements based on Reddit users' interaction with
3 the site, information from third party sites that integrate Reddit, and advertisers.²⁴

4 **2. Reddit Facilitates Child Sex Trafficking by Encouraging**
5 **Users to Target Underage Content**

6 56. Reddit disclosed for the first time in 2019 that it had hit the \$100
7 million-dollar mark in advertising revenue, and has 52 million daily active users, an
8 increase of 44% from 2018.²⁵

9 57. As one of the top ten most popular websites on the Internet, Reddit is
10 a popular channel for advertising purposes. If a post goes "viral," advertisers (and
11 Reddit) have the potential to earn a lot of money.²⁶

12 58. Reddit has an entire program, Reddit Ads, and promises advertisers
13 that it will "connect your brand to our 52 million daily active users."²⁷ One of the
14 ways Reddit recommends for its advertisers to have the most success with their
15 advertising campaigns is to target specific interest groups, specific sub-groups, and
16 specific sub-reddits.

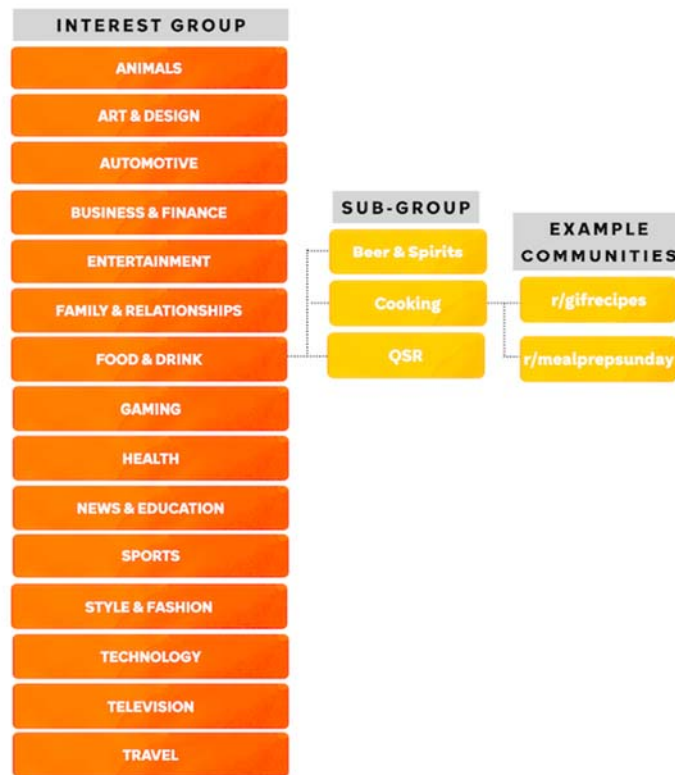
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25 ²⁴ <https://protectyoungeyes.com/apps/reddit-parental-controls/>

26 ²⁵ <https://adage.com/article/digital/reddit-plots-path-1b-ad-sales-first-it-needs-convince-brands/2298626#:~:text=Reddit%20disclosed%20for%20the%20first,of%2044%25%20since%20last%20year.>

27 ²⁶ <https://www.shopify.com/blog/119995717-findlay-hats-viral-reddit-post>

28 ²⁷ <https://www.shopify.com/blog/119995717-findlay-hats-viral-reddit-post>

1 59. The below screenshot from Reddit’s advertising page shows Reddit
2 directing potential advertisers to find subreddits (“example communities”) that will
3 allow the advertiser to “display your ad to the right audience based on a user’s
4 browsing behavior on Reddit.”²⁸



19 60. Reddit’s minimum spend for an advertising campaign is \$5, and it
20 costs \$0.75 per thousand-page views, which means that advertisers want to target
21 subreddits that get enough page views to be eligible for advertising. There are tools
22 like RedditList and FrontPageMetrics that help advertisers identify the subreddits
23 that are most likely to generate views, making their advertising campaigns
24 worthwhile.

25 61. A number of the subreddits highlighted on frontpagemetrics.com are
26 clearly targeting users interested in child pornography. For example, among Reddit’s
27

28 ²⁸ <https://advertising.reddithelp.com/en/categories/targeting/targeting-interest>

1 most popular subreddits are: r/LegalTeens, r/Dirty18girls, r/collegesluts,
2 r/TooCuteForPorn, r/Female18, r/barelylegalteens, r/Gonewild18, r/18nsfw,
3 r/xsmallyounggirls, r/YoungNiceGirls, r/teensdirtie, r/youngporn, r/TeenBeauties,
4 r/YoungExoticHoes, r/YoungGirlsGoneWild, r/18yoGirls, r/teensdirty.

5 62. The more views Reddit gets, the more advertiser interest it has, and
6 the more revenue it generates. By encouraging as much content to remain on Reddit
7 as possible, turning a blind eye to subreddits that are obviously geared toward child
8 pornography, and failing to train moderators to limit child pornography on Reddit,
9 Reddit continues to focus on its number one goal: profit.

10 3. Reddit's Knowingly Fails to Moderate Content

11 63. In an effort to attract attention and revenues, users post content that
12 generates traffic. Often this content is child pornography.

13 64. Reddit knowingly participates in and capitalizes on this user interest.

14 65. Besides the entirely inadequate verification process described above,
15 Reddit's only real "protection" that it choose to implement against the posting of
16 underage content and other illegal content is that it hires administrators and trains
17 volunteer moderators.

18 66. The Washington Post has described how Reddit has a "dense
19 hierarchy of volunteers" and employs a "handful" of "community managers" to
20 oversee them.²⁹

21 67. In August 2020, Reddit started beta testing a new program to train
22 and certify moderators. It has councils of moderators it consults with and offers
23 resources to guide the volunteers. For example, volunteer moderators can request
24 help from teams of experienced moderators.³⁰

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27 ²⁹ <https://www.washingtonpost.com/news/the-intersect/wp/2014/09/03/does-reddit-still-have-a-child-porn-problem/>

28 ³⁰ <https://www.washingtonpost.com/technology/2020/08/25/volunteer-moderators-2020/>

1 68. Although Reddit claims the goal of content moderation is to locate
2 and prevent the streaming of child pornography and other illegal material, the truth
3 is that Reddit’s focus is maximizing revenue. Reddit is known for its laissez-faire
4 approach to content moderation, which means that Reddit tries to ban as little content
5 as possible.

6 69. Reddit claims to have “dedicated teams that enforce [its] site-wide
7 policies, proactively go after bad actors on the site, and create engineering solutions
8 to detect and prevent them in the future.” It purports to “continue to strengthen the
9 measures [it] has in place to prevent or limit the impact of policy-breaking activity,
10 which combine technology tools with human review and moderation.”³¹ Despite
11 Reddit’s opportunities to monitor the content on subreddits, Reddit has repeatedly
12 failed to take action.

13 70. Reddit claims on its website that it “prohibits any sexual or suggestive
14 content involving minors or someone who appears to be a minor.” Reddit does not
15 make a commitment to users that it will immediately remove content sexual or
16 suggestive content involving minors and only provides users with an opportunity to
17 “report” content that sexualizes minors. The reporting tool merely allows a user to
18 link to a post and check a box that says “it’s sexual or suggestive content involving
19 minors.” There is no opportunity for a user to explain to Reddit why the content is
20 child pornography, and the user has to rely on a Reddit administrator or moderator to
21 decide whether to remove the content. Because Reddit’s business model profits from
22 sexual videos and images featuring underage victims, Reddit rarely removes such
23 content. What Reddit is actually doing is providing the window-dressing of content
24 moderation to satisfy the general public that it is operating a safe platform while in
25 practice shielding illegal content through non-enforcement of its policies. Again, the
26 reason for this is to maximize traffic on its website and boost revenues.

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28 ³¹ <https://www.vice.com/en/article/7k9ka4/girls-do-porn-doxing-reddit-banned>

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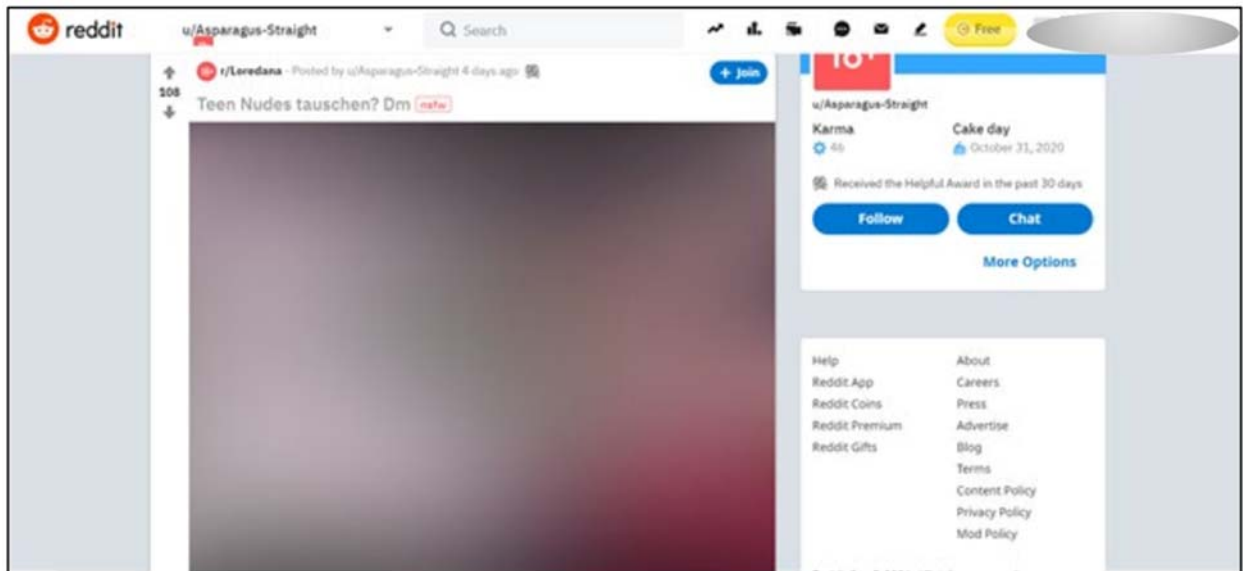
4. Reddit Facilitates Solicitation of CSEM

71. There are a troubling number of subreddits where users have been found soliciting or offering CSEM images via links to external websites and storage folders, like Discord.

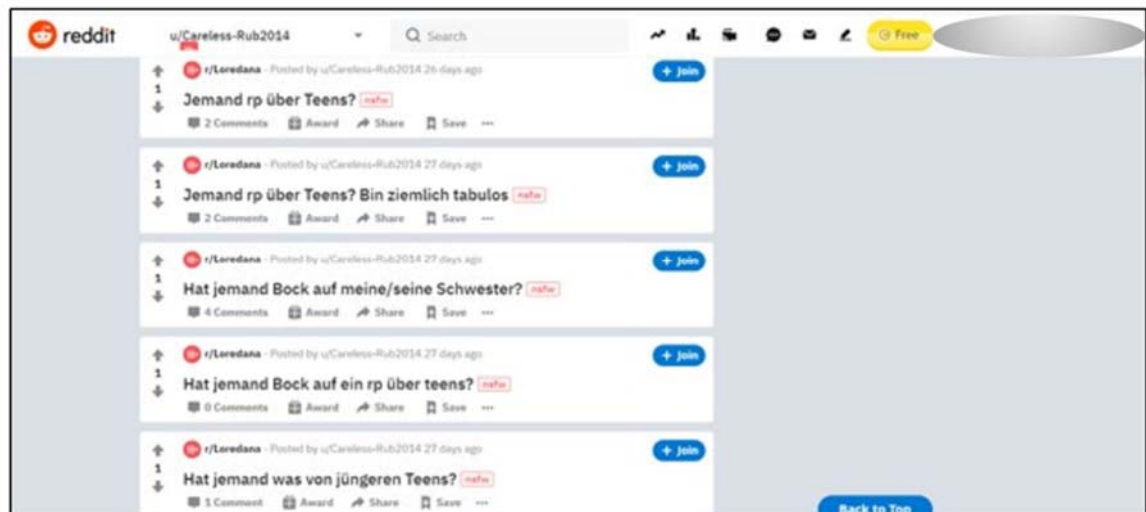
72. Offers to trade CSEM images or videos have been identified on the following subreddits alone:

- r/DiscordNudes/
- r/Loredana
- r/JerkOffToMySis
- r/sirtykikgroups
- r/dirtykikpals
- r/Strokebuds
- r/Wixbros
- r/Deutschtributes
- r/GermanTradesNSFW
- r/Pervs_wickr
- r/NicoleDobrikovHot/

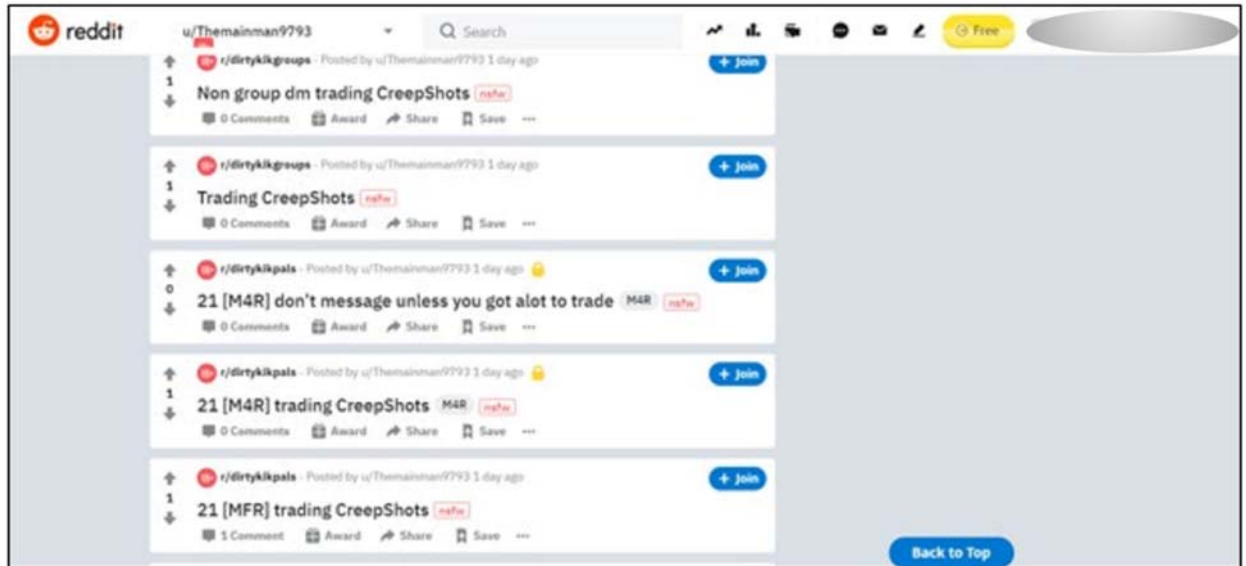
1 73. For example, an image and note asking to trade “teen nudes” was
2 posted to the r/Loredana subreddit by the user u/Asparagus-Straight.



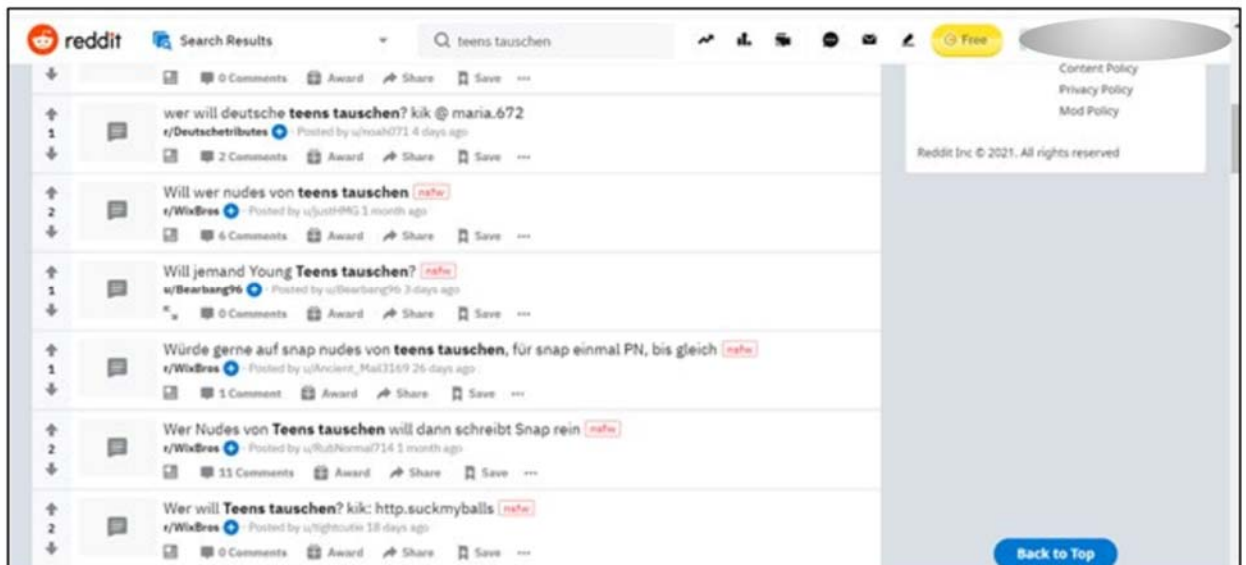
13 74. Similarly, the following notes were posted by user u/Careless-Rub
14 2014 to the subreddit r/Loredana. The photo solicitations (in German) include young
15 teens (jüngeren Teens), photos of a user’s sister (Schwester), and trading teens
16 “taboo-free” (tabulos).



1 75. As yet another example, the following messages were posted to the
2 subreddit r/dirtykikgroups by the user u/Themainman9793:



12 76. As yet another example, the following messages in German offered
13 to trade photos of teens (*teens tauschen*) including “young teens”:

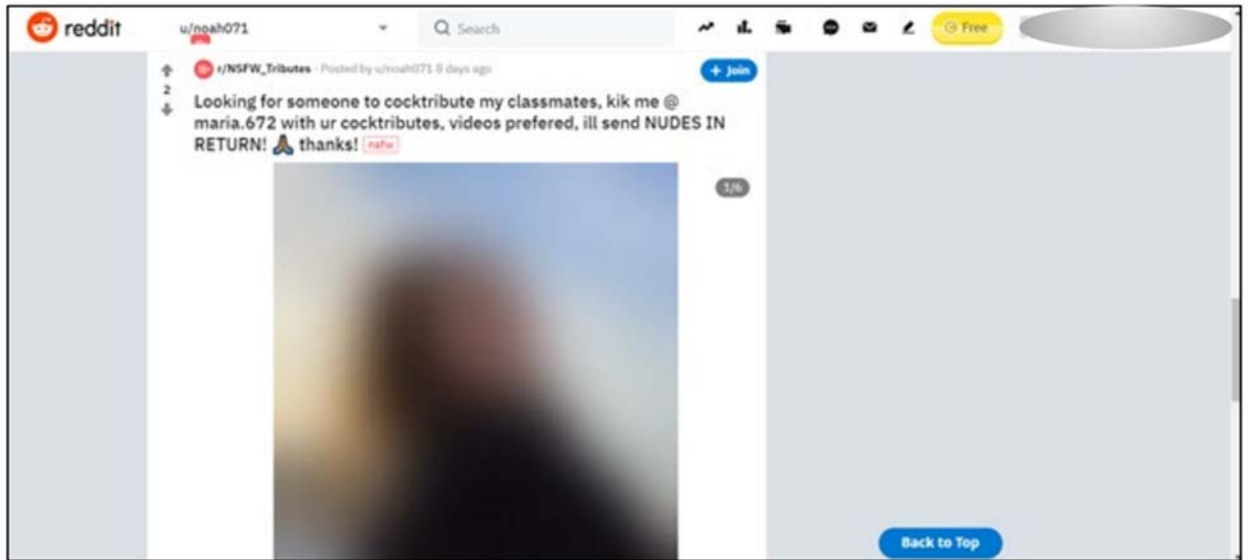


23 **5. Reddit Facilitates Non-Consensual Use of Minor Images as**
24 **Fetishes**

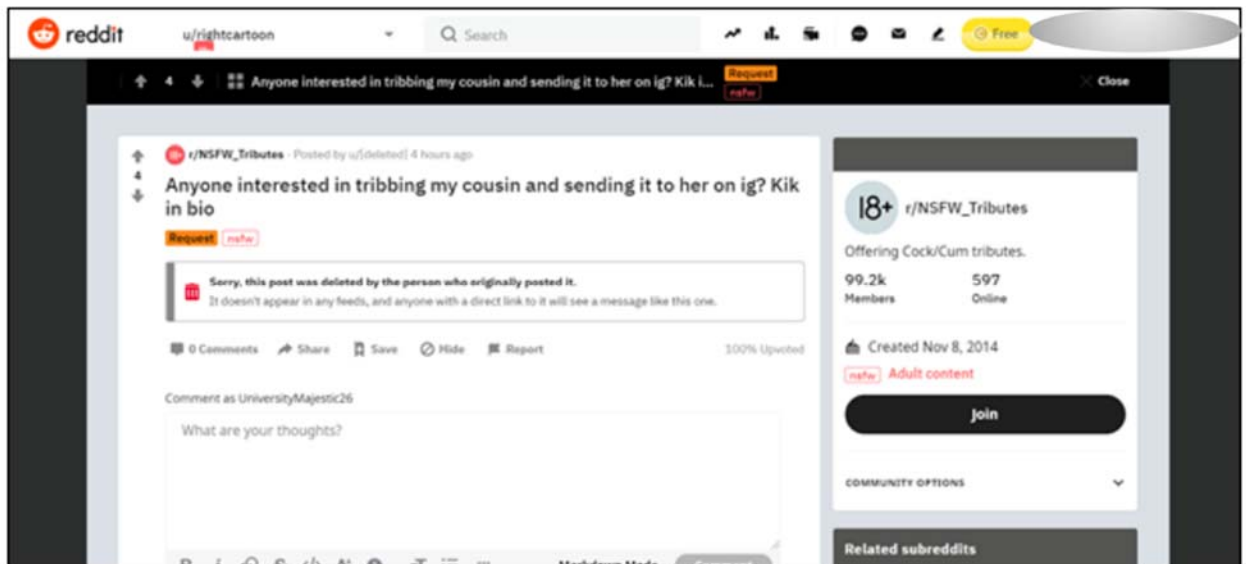
25 77. In addition to solicitation of CSEM, there are a number of subreddits
26 where users have posted photos of minors without consent and then used or solicited
27
28

1 the use of photos for sexual purposes, like the creation of pornographic images and
2 masturbation.

3 78. For example, the following post from subreddit r/NSFW_Tributes
4 includes an offer to trade CSEM:



13
14 79. This post, from the same subreddit, invites respondents to post their
15 “tribute” photos to the Instagram account of the minor female who was originally
16 pictured:



1 80. This type of content has been identified in the following subreddits
2 alone:

- 3 • r/NSFW_Tributes
- 4 • r/JerkOffToMySis
- 5 • r/GermanTradesNSFW
- 6 • r/Deutschtributes
- 7 • r/CockTributes
- 8 • r/cumtributes
- 9 • r/Cum_Tribute_Hub

10 **6. There are Countless Instances of Subreddits that Target**
11 **Users Searching for CSEM**

12 81. The extent of CSEM on Reddit is troubling. On public subreddits
13 alone, there are countless instances of CSEM. The following 48 subreddits are
14 merely some of the examples of subreddits that target users seeking CSEM:

- 15 • /r/jailbait/5
- 16 • /r/barelylegalteens
- 17 • /r/LegalTeensGW
- 18 • /r/18nsfw
- 19 • /r/worldpolitics6³²
- 20 • /r/18_Plus_NSFW/
- 21 • /r/hentai_irl
- 22 • /r/dirtysmall
- 23 • /r/FauxBait
- 24 • /r/petite

25 _____
26 ³² According to various Reddit posts, more than a year ago the r/worldpolitics
27 subreddit was “taken over” by users posting pornographic images, some of which
28 included CSEM.

- 1 • /r/aa_cups/
- 2 • /r/smallboobs
- 3 • /r/downblouse/
- 4 • /r/TeenBeauties
- 5 • /r/petite/
- 6 • /r/2000sGirls
- 7 • /r/Teenpussyx/
- 8 • /r/TooCuteForPorn
- 9 • /r/InnocentlyNaughty/
- 10 • /r/GoneWildCD
- 11 • /r/talkedintoit/
- 12 • /r/adorableporn
- 13 • /r/funsized
- 14 • /r/xsmallgirls
- 15 • /r/Amateur
- 16 • /r/gonewild
- 17 • /r/PetiteGoneWild
- 18 • /r/Nsfw_Amateurs
- 19 • /r/LegalTeens
- 20 • /r/youngporn
- 21 • /r/Gonewild18
- 22 • /r/IndianTeens
- 23 • /r/18_19
- 24 • /r/YoungPrettyHoes
- 25 • /r/18nsfw
- 26 • /r/snapleaks
- 27 • /r/Upskirt
- 28 • /r/Nude1819

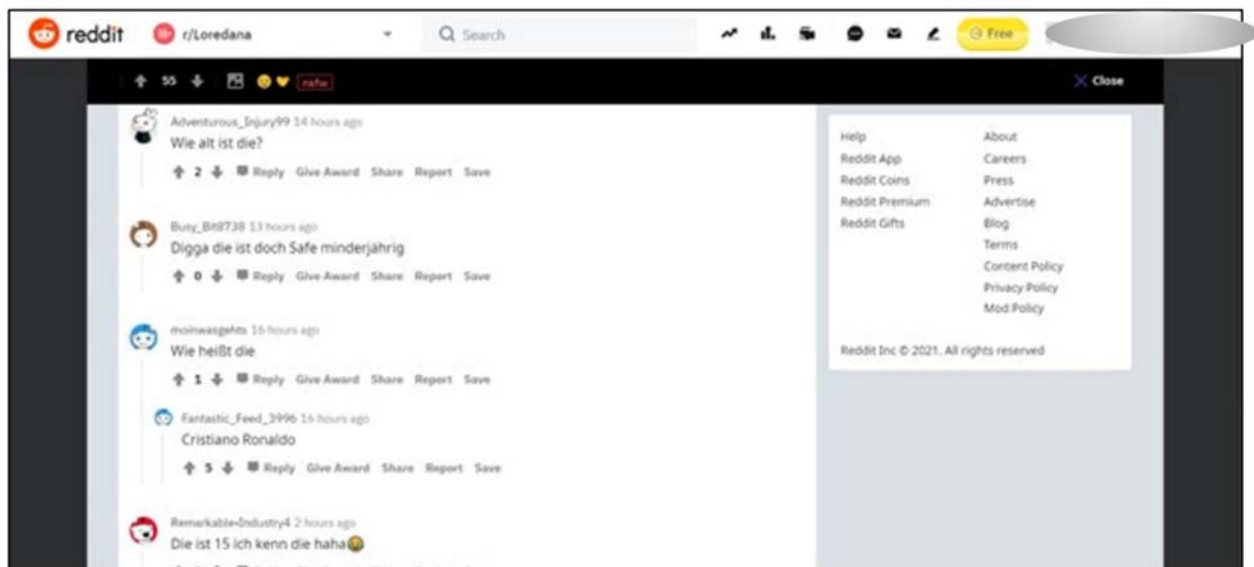
- 1 • /r/TinyTits
- 2 • /r/Omeglesex/
- 3 • /r/DirtySnapchat
- 4 • /r/SnapchatSext
- 5 • /r/collegesluts
- 6 • /r/Photobucket
- 7 • /r/ratemynudebody
- 8 • /r/NSFWKikGroups
- 9 • /r/Creepshots

10 82. An image posted by u/ExiledLuucifer696969 to the subreddit
11 r/JerkOffToMySis indicates that the photo is of a nude, pubescent female in the
12 shower with her breasts visible. The photo appears to have been taken surreptitiously
13 and includes an offer by the user to provide additional videos.

14 83. Similarly, an image posted by the user u/BearBang96 to the subreddit.
15 r/WixBros includes the text “u18,” suggesting that the subject is under 18 years old.

16 84. There are also a number of comments regarding explicit photos
17 demonstrating Reddit users’ awareness that the subjects are underage. The below
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1 comments by user u/Remarkable-Industry4 suggest that he knows the female posted
2 and that she is 15 years old.

3
4 85. There are additional instances of CSEM on the subreddits
5 r/Pervs_wickr and r/sTrokebuds.

6 86. These images are only a small sample of the content available on
7 Reddit, and do not encompass the content on private subreddits, where CSEM is
8 likely more prevalent.

9 87. In response to the proliferation of CSEM and other content in
10 violation of Reddit's rules, various subreddits have highlighted offensive content so
11 that it can be removed:

- 12 • u/Solocro wrote: r/familyincest filled with cp³³ looking at the person that
13 posted those vides shows that they have posted in different subs too
- 14 • u/worldbuilder3 wrote: r/nolimit cp
- 15 • u/Anongraffiti wrote: r/kittyashleeee about the 13 year old girl Well well
16 well looks like another one if this damn 13 year old keep popping up.
17 Although this one looks very very new You know what to do also. The
18 owner is u/ Thegoose0607 Another is u/ Status_Computer4519 definitely
19 a burner account Also in r/discordnudes a user by the name u/
20 wet_blanket304 was asking for nudes if Ms Ashley 13 days ago His
21 account doesn't seem to be a burner.
- 22 • u/GrainGang wrote: r/snapchatnudetraders Most recent post has a
23 degenerate [sic] asking for snaps of porn/lewd snaps of minors
- 24 • u/spidermon05 wrote: r/Cynnett2 posts CP and nudes of a minor she's
25 17 and they have videos of her from when she was 14-15 on there too. i
26 know she's underage because she lives in my city, everyone knows about

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28

³³ "cp" is a common term for CSEM ("child pornography").

1 communicating with administrators about issues impacting their communities or their
2 role.

3 91. One Reddit administrator noted that members of the team can be on
4 different schedules, so “it’s a bit of back and forth waiting” to address issues being
5 reviewed by multiple team members.³⁸ The administrator also said “unfortunately
6 sometimes tickets do get lost in the shuffle.”

7 92. Claims of moderator abuse are well documented in several subreddits,
8 including r/modsbeingdicks, r/watchredditdie, and r/subredditcancer. Many of these
9 posts identify seemingly arbitrary behavior by moderators that violate the Moderator
10 Guidelines.

11 93. Reddit has a history of failing to take action until controversial
12 content is reported in media sources. Several posts have indicated that Reddit will
13 not remove problematic subreddits unless they gain media or celebrity attention, or
14 if Reddit receive legal documentation. One post, dated June 14, 2018, contained a
15 list of “problematic subreddits,” several of which claim to feature “young looking”
16 subjects in a sexualized context.³⁹ This list was assembled with the intent of sending
17 it to the media so it could gain enough attention to get Reddit to shut the subreddits
18 down. As of April 1, 2021, all subreddits on that list are still active.

19 94. In many instances, moderators have claimed to remove CSEM
20 content only to have Reddit respond that the content “doesn’t violate Reddit’s
21 Content Policy.”⁴⁰ Even when Reddit does agree with a moderator’s decision to flag

22 _____
23 ³⁸ https://www.reddit.com/r/ModSupport/comments/bzpka6/how_understaffed_are_the_admins/er5j6xx/

24 ³⁹ The original post has been deleted, but it has been preserved as a comment at
25 https://www.reddit.com/r/Drama/comments/8r7qfj/terfs_are_trying_to_ban_pornography_off_of_reddit/eb444kx.

26 ⁴⁰ https://www.reddit.com/r/modhelp/comments/m5ltrb/reddit_ok_with_sexualization_of_minors/
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1 content for sexualizing minors, there are claims that the posts in question remain
2 online and accessible despite multiple reports and acknowledgement from Reddit
3 stating they have investigated and “actioned” the content.⁴¹

4 95. There are also reports of users receiving only temporary bans from
5 the site for posting content flagged as sexualizing a minor, and regaining full access
6 to their account after a few days, in addition to posts being incorrectly flagged and
7 actioned.⁴² Conversely, a user claimed that they reported an account posting what
8 appeared to be underage content, and the account remained online.⁴³

9 **8. Reddit Has Admitted That Videos Featuring Underage**
10 **Persons Are Some of the Most Popular/Sought-After Content**
11 **on Reddit**

12 96. The more controversial the subreddit, the more attention the subreddit
13 receives. The more attention the subreddit receives, the more revenue it generates.
14 Perhaps the best example is the /r/jailbait subreddit, which was removed in 2011 after
15 Anderson Cooper of CNN devoted a segment of his program to condemning the
16 subreddit and criticizing Reddit for hosting it. The “jailbait” subreddit was heralded
17 in the Reddit community as the chosen “subreddit of the year” in the “Best of reddit”
18 user poll in 2008 and at one point, jailbait was the second most common searched
19 term on the site.⁴⁴

20 97. Reddit’s general manager, Erik Martin, defended the subreddit by
21 saying: “We’re a free speech site with very few exceptions (mostly personal info)
22 _____

23 ⁴¹ [https://www.reddit.com/r/modhelp/comments/kv54p7/what_to_do_about_a_brok
24 en_cploli_reporting_system/](https://www.reddit.com/r/modhelp/comments/kv54p7/what_to_do_about_a_broken_cploli_reporting_system/)

25 ⁴² [https://www.reddit.com/r/help/comments/kswywo/why_arent_sexualization_of_m
26 inors_posts_deleted/](https://www.reddit.com/r/help/comments/kswywo/why_arent_sexualization_of_minors_posts_deleted/)

27 ⁴³ [https://www.reddit.com/r/WatchRedditDie/comments/fwlwpd/had_my_account_
28 permanently_suspended_for/](https://www.reddit.com/r/WatchRedditDie/comments/fwlwpd/had_my_account_permanently_suspended_for/)

⁴⁴ [https://web.archive.org/web/20121012213707/http://gawker.com/5950981/unmas
king-reddits-violentacrez-the-biggest-troll-on-the-web](https://web.archive.org/web/20121012213707/http://gawker.com/5950981/unmasking-reddits-violentacrez-the-biggest-troll-on-the-web)

1 and having to stomach occasional troll reddit like /r/picsofdeadkids or morally
2 questionable redds like /r/jailbait are part of the price of free speech on a site like
3 this.”⁴⁵

4 98. While Reddit’s executives may be content to have “morally
5 questionable redds”, the law prohibits it from knowingly profiting from sex
6 trafficking, which is what Reddit is doing here.

7 **C. Reddit Knows That Its Websites Are Known for Sex Trafficking**
8 **Activity**

9 99. This is not a situation where Reddit can credibly claim ignorance.
10 Reddit has itself admitted that it is aware of the presence of child pornography on its
11 website.

12 100. In December 2018, Reddit employee Marta Gossage explained to
13 *Insider* that, as part of her daily routine, after waking up early in her apartment on
14 Manhattan’s Upper West Side, she’d spend an hour or more checking in on recently
15 problematic subreddits, “such as whatever was bubbling up at the time in the
16 Violentacrez universe, say, r/picsofdeadfailbait, his attempt to outfilth r/jailbait,
17 which was now banned.”⁴⁶ Another employee, Erik Martin, likewise explained that
18 he was responsible for dealing with the more “grisly content” including “sexualized
19 images of minors.”⁴⁷

20 101. Beyond their own monitoring, there are various other ways in which
21 Reddit has been made aware of the fact that its platform has become a go-to home
22 for child pornography.

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26 _____
27 ⁴⁵ <https://www.dailydot.com/society/reddit-beatingwomen-misogyny-images/>

28 ⁴⁶ <https://www.businessinsider.com/reddit-moderators-jobs-and-the-early-days-of-reddit-2018-10>

⁴⁷ *Id.*

1 **1. The Presence of Underage Pornography Is Obvious From**
2 **Language on Reddit's Own Website**

3 102. To start, Reddit need go no further than the language used on its own
4 website.

5 103. For example, until Reddit came under pressure to take them down, it
6 was home to such subreddits as:

- 7 • /r/teen_girls
- 8 • /r/TeenGirls
- 9 • /r/pro_teen_models
- 10 • /r/preteen_girls
- 11 • /r/JailbaitArchives
- 12 • /r/JailbaitVideos
- 13 • /r/TrueJailbait
- 14 • /r/niggerjailbait
- 15 • /r/ChestyBait
- 16 • /r/bustybait
- 17 • /r/cutegirls
- 18 • /r/asianjailbait
- 19 • /r/JustTeens
- 20 • /r/JailbaitJunkies
- 21 • /r/jailbait_nospam
- 22 • /r/jailbaitgw
- 23 • /r/nudistbeach
- 24 • /r/Purenudism
- 25 • /r/teens
- 26 • /r/Thenewjailbait
- 27 • /r/trapbait
- 28 • /r/malejailbait

- 1 • /r/malejailbaitarchives
- 2 • /r/lolicon
- 3 • /r/shotacon
- 4 • /r/assbait
- 5 • /r/preteen_boys
- 6 • /r/photobucketplunder
- 7 • /r/AngieVarona
- 8 • /r/picsofdeadjailbait⁴⁸

9 2. Presence of Underage Pornography Brought to Reddit's 10 Attention Via Users

11 104. Users of Reddit, not to mention child pornography victims and their
12 families, have also notified Reddit of the presence of child pornography on their
13 website.

14 105. In 2012, a user explained: "I emailed an admit about a preteengirls
15 thread EXPLICITLY showing photos of child porn." The Reddit administrator
16 responded "thanks" and "[n]othing was done, NOTHING, which is what I expected."⁴⁹

17 106. Similarly, in the comments on the thread relating to Reddit's site-wide
18 rules regarding sexualization of minors, many users commented on a number of
19 subreddits that featured child pornography, including one subreddit that featured a
20 fourteen-year-old that had existed for almost four years.

21 107. As yet further examples, a moderator, elis8, commented on how the
22 subreddit r/starlets "was a source of all my troubles for years and it's still up even
23 though it's literally created to sexualize minors." And another user explained that
24 the subreddit "r/ratemeteen is basically a virtual pedophile ring."
25

26
27 ⁴⁸ https://www.reddit.com/r/blog/comments/pmj7f/a_necessary_change_in_policy/

28 ⁴⁹ <https://www.washingtonpost.com/news/the-intersect/wp/2014/09/03/does-reddit-still-have-a-child-porn-problem/>

1 108. Finally, a September 2020 story in *The U.S. Sun* details how a Reddit
2 user and moderator recently confessed—on Reddit—to being obsessed with child
3 pornography. He had joined a subreddit known as PedoGate that apparently was
4 about bringing justice to children, but after cops showed up at this user’s house,
5 Reddit eventually took the subreddit down as it turned out to be promoting “sexually
6 suggestive content involving minors.”⁵⁰

7 **3. Presence of Underage Pornography Brought to Reddit’s**
8 **Attention Via Third-Party Reporting**

9 109. Media outlets have also placed Reddit on notice of the presence of
10 child pornography its platform.

11 110. The mainstream media began covering Reddit’s child pornography
12 problem back in October 2011, following Anderson Cooper’s detailed coverage of
13 the darker side of the Reddit message boards. In particular, Mr. Cooper zeroed in on
14 a subreddit known as Jailbait, which was at the time home to more than 20,000 users.

15 111. On October 12, 2014, *Gawker* published an article exposing the
16 moderator of Jailbait, entitled “Unmasking Reddit’s Violentacrez, The Biggest Troll
17 on the Web.” As reported by *Gawker*, the subreddit Jailbait was “dedicated to
18 sexualized images of underage girls” and Violentacrez and his fellow moderators
19 worked hard to make sure every girl on jailbait was underage, diligently deleting any
20 photos whose subjects seemed older than 16 or 17.”⁵¹

21 112. On September 3, 2014, *The Washington Post* published an article
22 reporting on the “Celebgate” spectacle, which included naked photos of Olympic
23 gymnast McKayla Maroney—taken while she was underage—being posted on the
24 subreddit /r/thefapping. As the article makes clear, while what happened to
25 celebrities such as Ms. Maroney is terrible enough, at least they have publicists,

26 _____
27 ⁵⁰ <https://www.the-sun.com/news/1503509/reddit-pedogate-banned-moderator-addicted-child-porn/>

28 ⁵¹ <https://gawker.com/5950981/unmasking-reddits-violentacrez-the-biggest-troll-on-the-web>

1 lawyers, and legions of fans to bring pressure on Reddit to remove the specific
2 content. By contrast, the article begs the question of what is being “to help other
3 young women whose photos might end up in questionably tasteful forums like
4 /r/randomsexiness or /r/youngporn, where youthful photos are frequent, provenances
5 are unkown and subjects’ ages are rarely disclosed.” It goes on to conclude that
6 “Reddit still hosts virtually every kind of fifth and depravity you can conceive of –
7 and probably quite a bit that you can’t.” Including “rape porn”, “collections of dead
8 children” and “many, many nude photogrpahs of women who appear to just at, if not
9 under, the age of majority.”⁵²

10 113. On April 28, 2020, BuzzFeed.News reported how a TikTok sensation
11 found nude images that she had taken when was 17 on Reddit. The now-defunct
12 subreddit created to share the images was the fastest growing subreddit on April 3 of
13 that year, making it impossible for Reddit to have not known about it.⁵³

14 114. On September 24, 2020, *Rolling Stone* published an article entitled:
15 How TikTok Teens are Ending Up on Pornhub”, explaining that these underage
16 images are finding their way onto not only traditional porn websites, but also
17 Reddit.⁵⁴

18 115. More recently, on December 4, 2020, *New York Times* opinion
19 columnist Nicholas Kristof published a detailed piece entitled “The Children of
20 Pornhub.” While the focus of the article was the presence of child pornography on
21 various pornographic websites, Mr. Kristof explained: “Depictions of child abuse
22 also appear on mainstream sites like Twitter, Reddit and Facebook.”⁵⁵

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25 ⁵² <https://www.washingtonpost.com/news/the-intersect/wp/2014/09/03/does-reddit-still-have-a-child-porn-problem/>

26 ⁵³ <https://www.buzzfeed.com/cameronwilson/tiktok-underage-nudes-leaked-harassment>

27 ⁵⁴ <https://www.rollingstone.com/culture/culture-news/tiktok-dance-pornhub-nonconsensual-porn-1064794/>

28 ⁵⁵ <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>

1 **4. Presence of Underage Pornography Brought to Reddit’s**
2 **Attention Via Advocacy Groups**

3 116. Advocacy groups have devoted significant resources to bringing
4 attention to the ubiquitous problem of child pornography on Reddit.

5 117. Most notably, since 2013, the National Center on Sexual Exploitation
6 has published “The Dirty Dozen List”—an annual campaign calling out twelve
7 mainstream entities for facilitating or profiting from sexual abuse and exploitation.
8 In 2021, Reddit earned a spot on the list. As explained by the Center: “child sexual
9 abuse material is also easily found on the site because Reddit refuses to institute
10 strong polices and, despite being worth \$6 billion, refuses to spend money on
11 moderators and technology solutions to reduce sexual abuse and exploitation material
12 surfacing on their site.”⁵⁶

13 118. In sum, Reddit fully understands and markets itself as a gateway of
14 the internet, and while discovery will reveal the full extent to which Reddit is aware
15 of the existence of child pornography being trafficked through its own websites,
16 there’s simply no question it is aware of the staggering flow of child pornography
17 over the world wide web as a whole, and yet it did little to nothing to prevent it from
18 its own websites.

19 **IV. JANE DOE’S EXPERIENCE AS A VICTIM OF DEFENDANTS’ SEX**
20 **TRAFFICKING**

21 119. Jane Doe was in high school when her boyfriend created four videos
22 of the two of them engaging in sexual intercourse. She was sixteen years old at the
23 time the videos were recorded, and some of the videos were recorded without her
24 knowledge let alone consent.

25 120. The relationship ended when Jane Doe’s boyfriend pushed her out of
26 his moving car onto the street, dragging her until she was able to free herself.

27
28 ⁵⁶ <https://endsexualexploitation.org/reddit/>
35

1 121. After the relationship ended, Jane Doe learned from a mutual friend
2 that her ex-boyfriend had posted multiple videos and images online of the two of
3 them engaging in sexual intercourse. Jane Doe is clearly identifiable in the videos
4 and images, which were posted to various websites, including Reddit, from the period
5 of December 2019 to the present.

6 122. The postings were accompanied by crude, disparaging, misogynistic
7 and/or racist remarks. As just one example, some of the posts encouraged other
8 Reddit users to film themselves jerking off to the images—which again were pictures
9 of an underage Jane Doe taken without her knowledge let alone consent—and then
10 post those videos to Reddit.

11 123. As soon as she became aware of the posts on Reddit, Jane Doe
12 immediately reported them to the moderators on the individual subreddits. In many
13 of her communications, she made clear that she was the woman in the videos, that
14 she was underage at the time they were made, and that she had never consented to
15 their production, let alone dissemination online. For these reasons, she asked that
16 they be taken down immediately.

17 124. Even after she brought the matter to Reddit’s attention, Reddit would
18 sometimes wait several days before taking down the content.

19 125. At some point, Jane Doe learned a trick. While she had started off by
20 telling moderators that the content included child pornography, and that it was non-
21 consensual, she noticed she got better responses when she added that there was a
22 copyright issue. That is, Reddit’s moderators appeared to care more about and
23 respond more quickly to a message flagging a possible copyright concern, than a
24 message flagging non-consensual child pornography.

25 126. Worse yet, because Reddit has zero policy in place for preventing the
26 posting of this type of content, even after it has been specifically flagged, whenever
27 Reddit would finally agree to remove a post, Jane Doe’s ex-boyfriend would simply
28 post anew, often to the exact same subreddit. And somehow it fell on Jane Doe, and

1 not the subreddit's moderator—to find these new posts and once again fight to have
2 them removed. When Jane Doe was finally successful in having her ex-boyfriend's
3 Reddit account banned, he simply made a new account and was once again free to
4 post all the child pornography he liked.

5 127. Because Reddit refused to help, it fell to Jane Doe to monitor no less
6 than thirty-six subreddits—that she knows of—which Reddit allowed her ex-
7 boyfriend to repeatedly use to repeatedly post child pornography. This is despite the
8 fact that, as Reddit well knew, throughout this time her ex-boyfriend uploaded the
9 content from the identical IP address.

10 128. To be clear, Reddit's refusal to act has meant that for the past several
11 years Jane Doe has been forced to log on to Reddit and spend hours looking through
12 some of its darkest and most disturbing subreddits so that she can locate the posts of
13 her underage self and then fight with Reddit to have them removed. She does this
14 often, and her effort continues to this day. Despite these incredible efforts, without
15 Reddit's assistance the situation is hopeless.

16 129. The circulation of the videos and images, and the effort she has had
17 to undertake to both locate them and negotiate with Reddit to have them removed,
18 has caused Ms. Doe great anxiety, distress and sleeplessness. She has had recurring
19 thoughts of contemplating suicide and feelings of hopelessness, resulting in
20 withdrawing from school and seeking therapy.

21 **CLASS ACTION ALLEGATIONS**

22 130. Plaintiff brings this action on her own behalf, and on behalf of a class
23 pursuant to Rule 23(a), (b)(2) and (b)(3) of the Federal Rules of Civil Procedure. The
24 Class is defined as:

25 all persons who were under the age of 18 when they appeared in a video
26 or image that has been uploaded or otherwise made available for
27 viewing on any website owned or operated by Reddit, Inc. in the last ten
28 years.

1 131. Plaintiff also brings this action on behalf of:
2 all persons residing in California who were under the age of 18 when
3 they appeared in a video or image that has been uploaded or otherwise
4 made available for viewing on any website owned or operated by
5 Reddit, Inc. in the last ten years (the “California Subclass”).

6 132. The members of the Class are so numerous that joinder of all members
7 is impracticable. While the exact number of Class members is unknown to Plaintiff
8 at this time and can only be ascertained through appropriate discovery, Plaintiff
9 believes that there are many thousand members of the Class. Absent members of the
10 Class may be notified of the pendency of this action using a form of notice similar to
11 that customarily used in purchaser class actions.

12 133. Plaintiff’s claims are typical of the claims of the members of the
13 Class, as all members of the Class were similarly affected by Defendant’s wrongful
14 common course of conduct complained of herein.

15 134. Plaintiff will fairly and adequately protect the interests of the
16 members of the Class and has retained counsel competent and experienced in class
17 action litigation.

18 135. Common questions of law and fact exist as to all members of the Class
19 and predominate over any questions solely affecting individual members of the Class.
20 Among the questions of law and fact common to the Class are:

- 21 (a) Whether Defendant knowingly benefitted from child trafficking;
- 22 (b) Whether user-generated uploads on Defendant’s websites feature
23 underage victims;
- 24 (c) Whether Defendant knew or should have known that there were
25 videos and/or images of underage victims on its websites; and
- 26 (d) Whether Defendant’s age verification system prevents users from
27 uploading child pornography.
- 28 (e) Whether Defendant has earned profits from child trafficking;

1 142. Rather than take action to combat the problem of child sex trafficking,
2 Defendant intentionally catered their websites to facilitate sex trafficking and make
3 it easier for traffickers to monetize underage victims in commercial sex acts.

4 143. Defendant not only maintained affiliations with sex traffickers by
5 enabling the posting of child pornography on their websites, they have strengthened
6 those affiliations by making it easier to connect traffickers with those who want to
7 view child pornography.

8 144. Defendant has repeatedly featured victims who have not attained the
9 age of 18 years in videos/images on its websites. The victims have engaged in
10 commercial sex acts because all of the videos featured on its websites generate
11 revenue for Defendant and/or traffickers and depict sex acts.

12 145. Defendant had a reasonable opportunity to observe the victims
13 featured on its websites because their moderators had the opportunity to view all of
14 the content posted thereon.

15 146. Defendant's conduct has harmed the Class by causing physical,
16 psychological, financial, and reputational harm.

17 **SECOND CLAIM FOR RELIEF**

18 **VIOLATION OF DUTY TO REPORT CHILD**

19 **SEXUAL ABUSE MATERIAL**

20 **18 U.S.C. § 2258A**

21 147. Plaintiff incorporates each and every allegation set forth above as if
22 fully set forth herein.

23 148. As an "electronic communication service provider," Defendant's
24 websites are a "provider" under 18 U.S.C. § 2258E(6) and 2258A.

25 149. Defendant obtained actual knowledge that there was online sexual
26 exploitation material of children being published on their websites, which was an
27 apparent violation of 18 U.S.C. § 2252.
28

1 150. Defendant knowingly engaged in intentional misconduct by ignoring
2 clear notice of the presence of actual online sexual exploitation material of children.
3 18 U.S.C. § 2258B(b)(1).

4 151. Defendant’s conduct constitutes a failure to act with reckless
5 disregard to a substantial risk of causing physical injury without physical
6 justification. 18 U.S.C. § 2258B(b)(2)(B).

7 152. Defendant’s conduct constitutes a failure to act for a purpose
8 unrelated to the performance of any responsibility or function under 18 U.S.C. §§
9 2258B(b)(2)(C).

10 153. Defendant’s conduct has seriously harmed the Class, including
11 without limitation, physical, psychological, financial, and reputational harm.

12 **THIRD CLAIM FOR RELIEF**

13 **RECEIPT AND DISTRIBUTION OF CHILD PORNOGRAPHY**

14 **18 U.S.C. § 2252A**

15 154. Plaintiff incorporates each and every allegation set forth above as if
16 fully set forth herein.

17 155. Defendant knowingly and intentionally offer, operate, maintain an
18 advertise on their websites. Defendant also knowingly and intentionally encourage
19 traffic on their websites and encourage advertisers to purchase advertisement space
20 thereon.

21 156. Defendant knowingly received and distributed child pornography
22 depicting Plaintiff and the Class on their websites.

23 157. Defendant’s receipt and distribution of child pornography occurred in
24 or affected interstate or foreign commerce.

25 158. As a proximate result of Defendant’s violation of 18 U.S.C. § 2252A,
26 Plaintiff and the Class have suffered serious harm including, without limitation,
27 physical, psychological, financial, and reputational harm.

28

1 159. Defendant’s conduct was malicious, oppressive, or in reckless
2 disregard of Plaintiff’s rights and the Class’ rights and Plaintiff and the Class are
3 entitled to injunctive relief, compensatory and punitive damages, and the costs of
4 maintaining this action. 18 U.S.C. § 2252A(f).

5 160. Defendant’s liability for knowingly violating 18 U.S.C. § 2252A is
6 not limited by 47 U.S.C. § 230 because nothing in Section 230 “shall be construed to
7 impair the enforcement of [] chapter [] 110 (relating to sexual exploitation of
8 children) [] or any other Federal criminal statute.” 47 U.S.C. § 230(e)(1).

9 **FOURTH CLAIM FOR RELIEF**
10 **DISTRIBUTION OF PRIVATE SEXUALLY EXPLICIT**
11 **MATERIALS, CAL. CIV. CODE § 1708.85**
12 **(On behalf of California Subclass)**

13 161. Plaintiff incorporates each and every allegation set forth above as if
14 fully set forth herein.

15 162. Defendant intentionally distributed child pornography.

16 163. Plaintiff and the Class did not consent to the online distribution of the
17 videos and images depicting them.

18 164. Defendant knew Plaintiff and the Class had a reasonable expectation
19 that the videos depicting them would remain private.

20 165. The videos depicted on Defendant’s websites exposed intimate body
21 parts of Plaintiff and the Class.

22 166. Plaintiff and the Class were harmed by Defendant’s knowing and
23 intentional distribution of child pornography and Defendant’s conduct was a
24 substantial factor in causing harm to Plaintiff and the Class.

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FIFTH CLAIM FOR RELIEF
VIOLATION OF CALIFORNIA’S UNFAIR COMPETITION LAW (“UCL”)
Cal. Bus. & Prof. Code § 17200
(On behalf of California Subclass)

167. Plaintiff incorporates each and every allegation set forth above as if fully set forth herein.

168. Defendant has violated the UCL by engaging in unlawful, unfair, and fraudulent business acts and practices.

169. Defendant knowingly had inadequate age verification systems in place that enabled users to upload child pornography to Defendant’s websites.

170. Defendant’s conduct constitutes an unlawful, unfair, and fraudulent business act and practice.

SIXTH CLAIM FOR RELIEF
UNJUST ENRICHMENT

171. Plaintiff incorporates each and every allegation set forth above as if fully set forth herein.

172. Defendant profited off of videos and images depicting Plaintiff and the Class on Defendant’s websites.

173. By permitting users to upload videos and images of Plaintiff and the Class and profiting from those videos and images, Defendant have become unjustly enriched at the expense of Plaintiff and the Class in an amount to be determined at trial.

PRAYER FOR RELIEF

WHEREFORE, plaintiff prays for judgment, as follows:

- A. Determine that this action is a proper class action under Rule 23 of the Federal Rules of Civil Procedure and appointing plaintiff’s counsel as Class counsel;
- B. Award injunctive relief sufficient to bring Defendant’s policies in compliance with the TVPRA.

1 C. Award compensatory and punitive damages in favor of Plaintiff and the
2 Class against all Defendant, jointly and severally, for all damages sustained as a result
3 of defendants' violations of the law, in an amount to be proven at trial, including
4 prejudgment interest thereon.

5 D. Award Plaintiff and the Class reasonable attorneys' fees, costs and
6 expenses incurred in this action, including expert fees.

7 E. Award such other and further relief as the Court may deem just and
8 proper.

9 Dated: April 22, 2021

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JURY DEMAND

Pursuant to Fed. R. Civ. P. 38(b), plaintiff demands trial by jury of all of the claims asserted in this complaint so triable.

Dated: April 22, 2021

DAVIDA BROOK
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