

1 DAVIDA BROOK (275370)  
2 dbrook@susmangodfrey.com  
3 KRYSTA KAUBLE PACHMAN (280951)  
4 kpachman@susmangodfrey.com  
5 SUSMAN GODFREY L.L.P.  
6 1900 Avenue of the Stars, Suite 1400  
7 Los Angeles, CA 90067  
8 Phone: (310) 789-3100; Fax: (310) 789-3150

9 ARUN SUBRAMANIAN  
10 (*Pro Hac Vice forthcoming*)  
11 asubramanian@susmangodfrey.com  
12 SUSMAN GODFREY L.L.P.  
13 1301 Avenue of the Americas, 32nd Fl.  
14 New York, NY 10019-6023  
15 Phone: (212) 336-8330; Fax: (212) 336-8340

16 (*See additional counsel on signature page*)

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.<sup>1</sup>

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

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26 <sup>1</sup> [https://www.reddit.com/r/blog/comments/pmj7f/a\\_necessary\\_change\\_in\\_policy/](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.<sup>2</sup>

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.<sup>3</sup>

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)."

25  
26  
27 <sup>2</sup> <https://coil.com/p/RileyQ/Child-Trafficking-What-You-Need-To-Know/mj4WEwhW7>

28 <sup>3</sup> *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%.<sup>4</sup>

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.<sup>5</sup>

## 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

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25           <sup>4</sup> <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>

26           <sup>5</sup> “Renting an Organ for Ten Minutes: What Tricks Tell Us about Prostitution,  
27 Pornography, and Trafficking,” in *Pornography: Driving the Demand in International Sex Trafficking*, ed. David E. Guinn and Julie DiCaro (Bloomington,  
28 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.<sup>6</sup> 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.<sup>7</sup>

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.

25  
26  
27 <sup>6</sup> <https://www.newyorker.com/magazine/2018/03/19/reddit-and-the-struggle-to-detoxify-the-internet>

28 <sup>7</sup> <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’).”<sup>8</sup>

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.<sup>9</sup>

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

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

<sup>9</sup> <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.<sup>10</sup>

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 <sup>10</sup> <https://www.investopedia.com/articles/investing/093015/how-reddit-makes-money.asp#:~:text=The%20company%20generates%20revenue%20through,users%20to%20share%20media%20content.>  
28

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.”<sup>11</sup>

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.”<sup>12</sup>

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.”<sup>13</sup>

24  
25 <sup>11</sup> [https://www.reddit.com/r/announcements/comments/7vxzrb/update\\_on\\_sitewide\\_rules\\_regarding\\_involuntary/](https://www.reddit.com/r/announcements/comments/7vxzrb/update_on_sitewide_rules_regarding_involuntary/)

26 <sup>12</sup> [https://www.reddit.com/r/technology/comments/pmbyc/somethingawfulcom\\_starts\\_campaign\\_to\\_label\\_reddit/c3qj2ww/](https://www.reddit.com/r/technology/comments/pmbyc/somethingawfulcom_starts_campaign_to_label_reddit/c3qj2ww/)

27 <sup>13</sup> 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.”<sup>14</sup>

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.<sup>15</sup>

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.<sup>16</sup>

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 <sup>14</sup> The post was made three years ago, but the r/starlets subreddit has subsequently  
been banned.

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

28 <sup>16</sup> <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.<sup>17</sup>

## 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.<sup>18</sup> 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.<sup>19</sup>

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.

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

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

27 <sup>19</sup> <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’).”<sup>20</sup> 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.<sup>21</sup>

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.<sup>22</sup>

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.<sup>23</sup>

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23  
24 <sup>20</sup> <https://reddit.zendesk.com/hc/en-us/articles/204511829-What-is-karma->

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

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

27 <sup>23</sup> <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.<sup>24</sup>

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.<sup>25</sup>

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.<sup>26</sup>

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."<sup>27</sup> 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 <sup>24</sup> <https://protectyoungeyes.com/apps/reddit-parental-controls/>

26 <sup>25</sup> <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 <sup>26</sup> <https://www.shopify.com/blog/119995717-findlay-hats-viral-reddit-post>

28 <sup>27</sup> <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.”<sup>28</sup>



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 <sup>28</sup> <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.<sup>29</sup>

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.<sup>30</sup>

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26  
27 <sup>29</sup> <https://www.washingtonpost.com/news/the-intersect/wp/2014/09/03/does-reddit-still-have-a-child-porn-problem/>

28 <sup>30</sup> <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.”<sup>31</sup> 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 <sup>31</sup> <https://www.vice.com/en/article/7k9ka4/girls-do-porn-doxing-reddit-banned>

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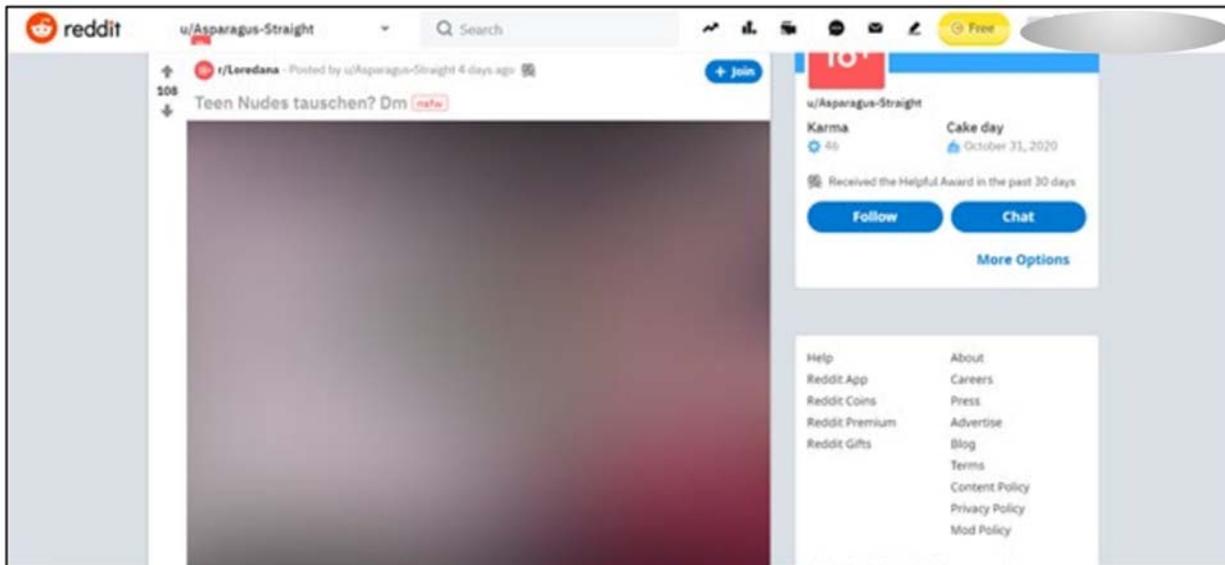
#### 4. Reddit Facilitates Solicitation of CSEM

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.

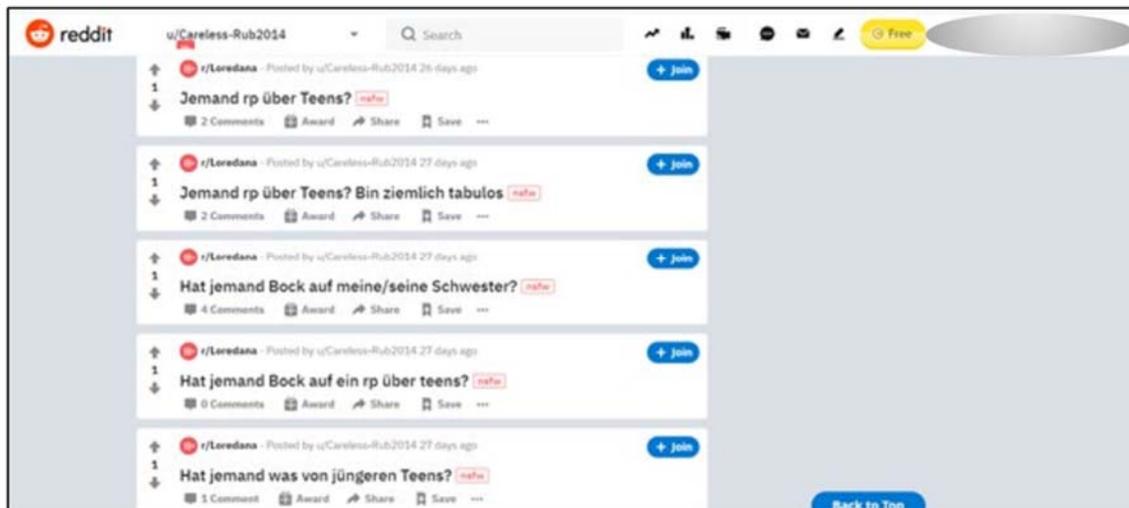
72. Offers to trade CSEM images or videos have been identified on the following subreddits alone:

- r/DiscordNudes/
- r/Loredana
- r/JerkOffToMySis
- r/sirtykikgroups
- r/dirtykikpals
- r/Strokebuds
- r/Wixbros
- r/Deutschtributes
- r/GermanTradesNSFW
- r/Pervs\_wickr
- r/NicoleDobrikovHot/

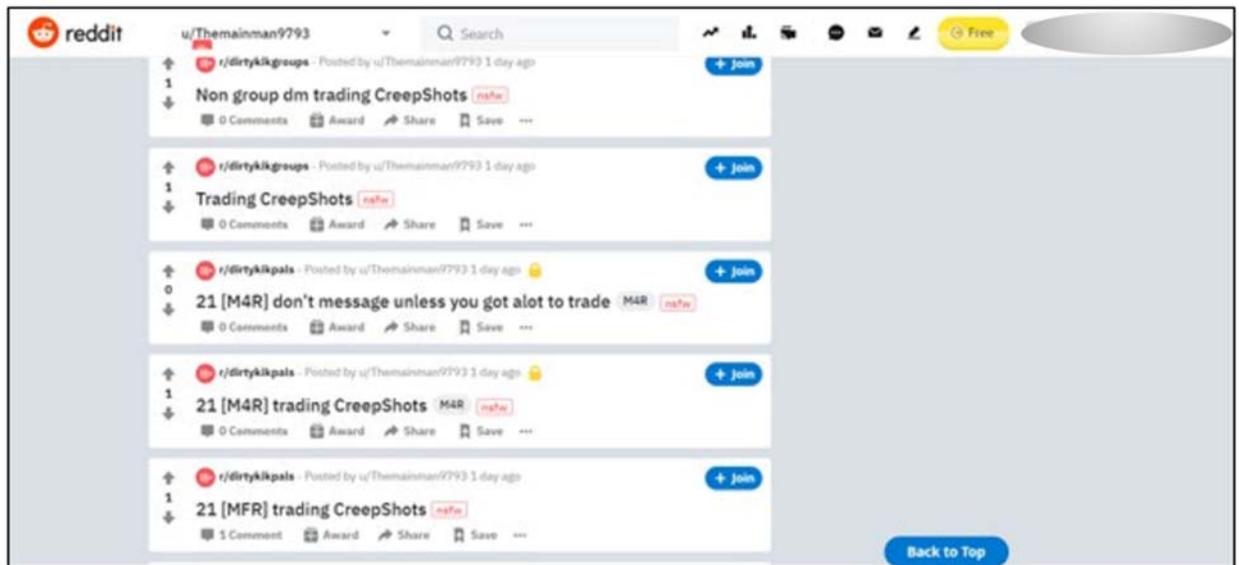
1           73.       For example, an image and note asking to trade “teen nudes” was  
2 posted to the r/Loredana subreddit by the user u/Asparagus-Straight.



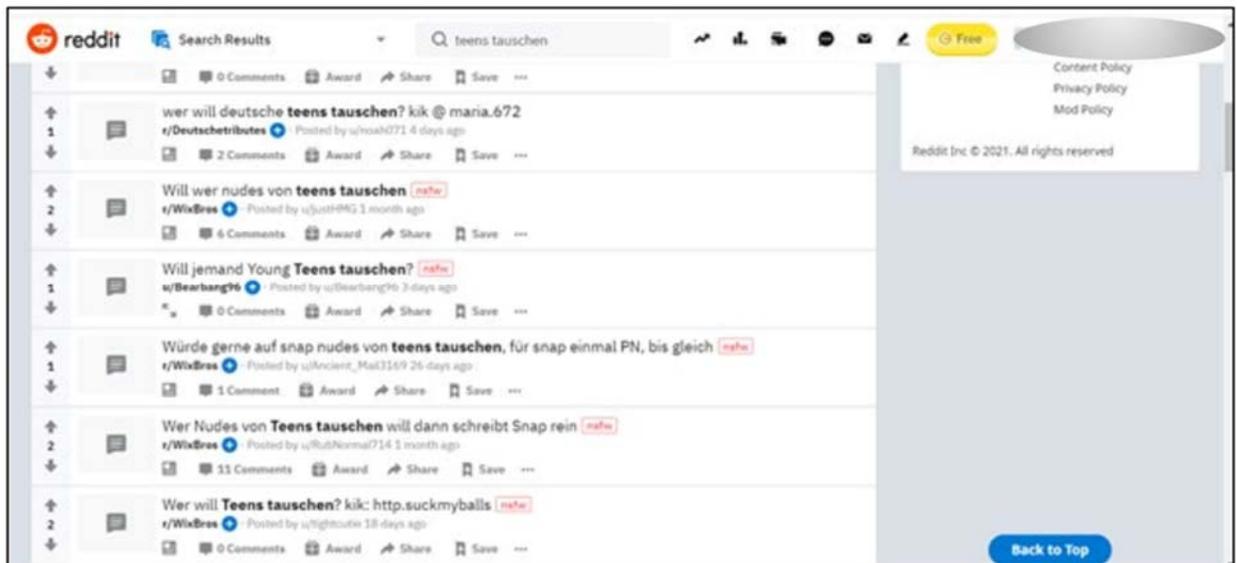
13           74.       Similarly, the following notes were posted by user u/Careless-Rub  
14 2014 to the subreddit r/Loredana. The photo solicitations (in German) include young  
15 teens (jüngeren Teens), photos of a user’s sister (Schwester), and trading teens  
16 “taboo-free” (tabulos).



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”:

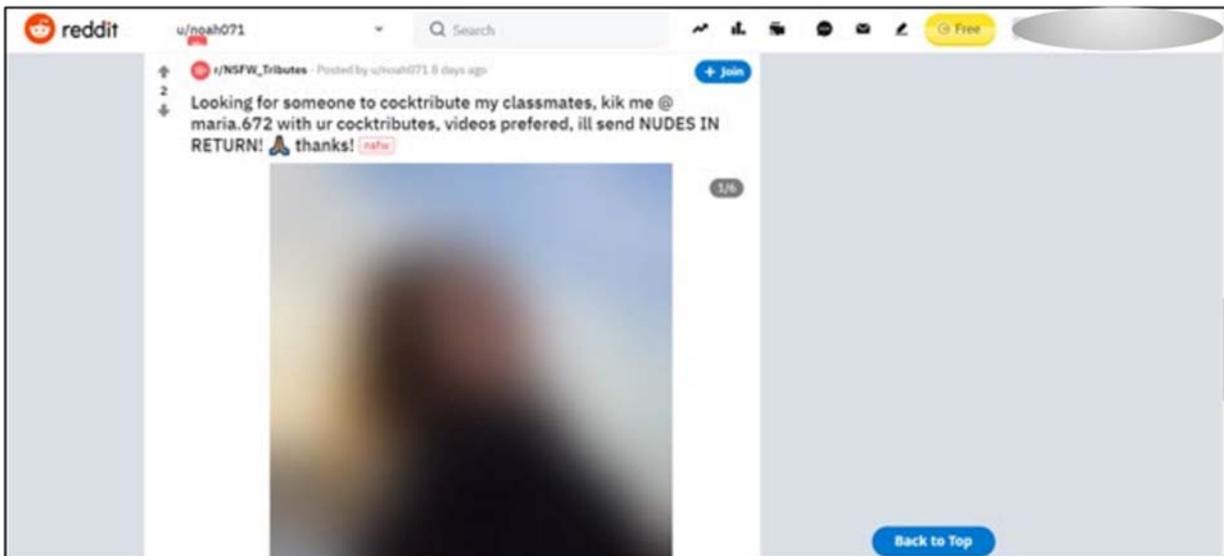


23 **5. Reddit Facilitates Non-Consensual Use of Minor Images as**  
 24 **Fetishes**

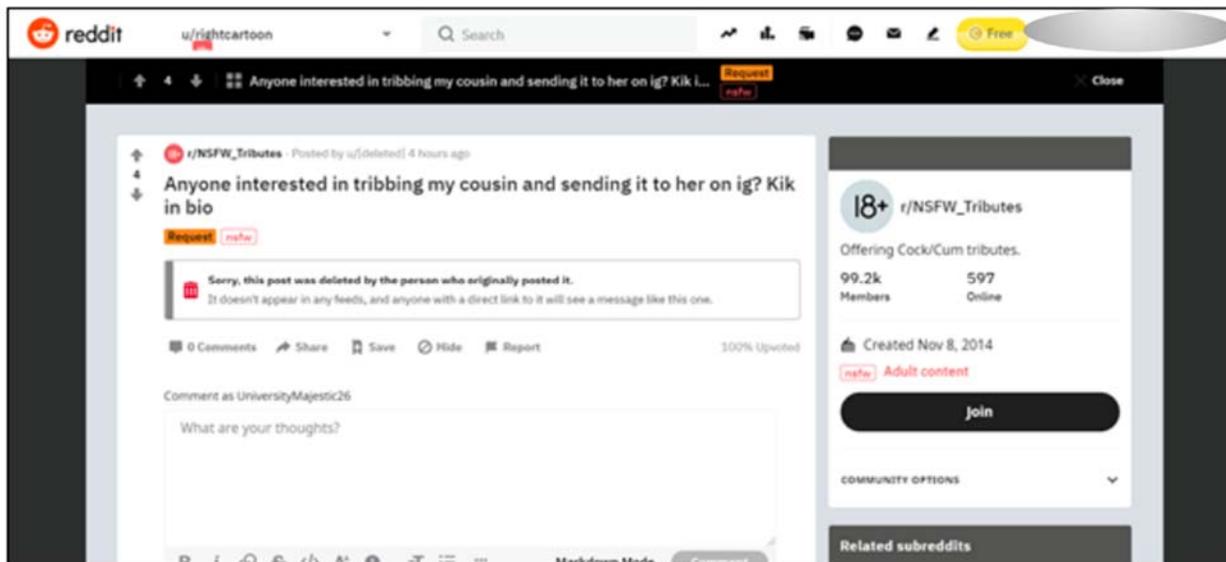
25 77. In addition to solicitation of CSEM, there are a number of subreddits  
 26 where users have posted photos of minors without consent and then used or solicited  
 27  
 28

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/worldpolitics6<sup>32</sup>
- 20           • /r/18\_Plus\_NSFW/
- 21           • /r/hentai\_irl
- 22           • /r/dirtysmall
- 23           • /r/FauxBait
- 24           • /r/petite

25 \_\_\_\_\_  
26 <sup>32</sup> 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/Up skirt
- 28 • /r/Nude1819

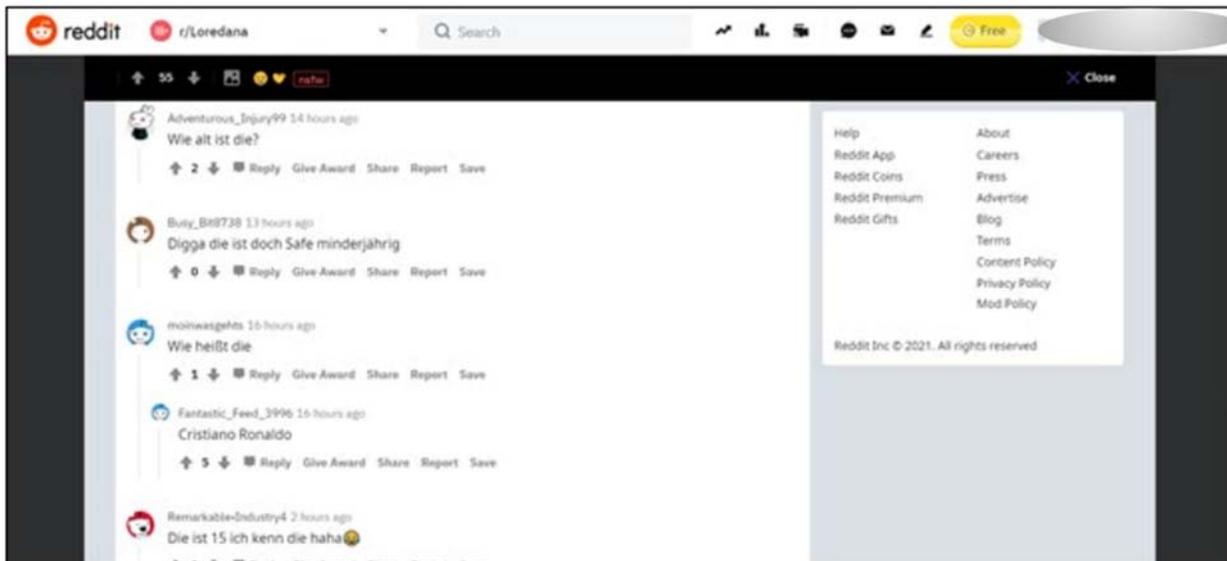
- 1                   • /r/TinyTits
- 2                   • /r/Omeglesex/
- 3                   • /r/DirtySnapchat
- 4                   • /r/SnapchatSext
- 5                   • /r/collegesluts
- 6                   • /r/Photobucket
- 7                   • /r/ratemynudebody
- 8                   • /r/NSFWKikGroups
- 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 cp<sup>33</sup> 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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<sup>33</sup> "cp" is a common term for CSEM ("child pornography").

1 how she has an OF as a minor. please report r/Cynnett2, it is CP without  
2 a doubt.

- 3 • u/Guuguuff22 wrote: r/gabriellaSaraivahNSFW contains nude images  
4 of a 16 years old

### 5 7. **Reddit Has a History of Moderator Negligence and Abuse**

6 88. Reddit’s internal security has been compromised by its choice to rely  
7 on unpaid moderators, which fail to enforce the standards that are supposed to protect  
8 Reddit users and others. In contrast to other technology and social media firms,  
9 which employ “armies” of paid moderators and contractors trained to sift through  
10 content for policy violations or illegal material, Reddit’s “crowdsourced” approach  
11 is understaffed to deal with the volume of content on the site. This is shocking given  
12 the substantial revenue and “valuation” attributed to Reddit, which was recently  
13 reported to be 6 billion.<sup>34</sup>

14 89. There are limited options for users to report poor moderation.  
15 Reddit’s online support site<sup>35</sup> allows users to “submit a request” for assistance and  
16 includes “File a Moderator Complaint” in the drop-down menu. According to a  
17 Reddit administrator, “more than 99%” of these reports are not actionable.<sup>36</sup>

18 90. Numerous users have complained about Reddit administrator  
19 response times and effectiveness.<sup>37</sup> The tools available to report poor moderation are  
20 not effective. Reddit administrators are frequently slow to respond to user reports  
21 and in many cases they fail to “actually enforce the health community rules.” The  
22 administrative team is understaffed, and moderators have noted their difficulty in

23 <sup>34</sup> [https://www.cnn.com/2021/02/09/reddits-valuation-doubles-to-6-billion-after-](https://www.cnn.com/2021/02/09/reddits-valuation-doubles-to-6-billion-after-new-250-million-funding-round-.html)  
24 [new-250-million-funding-round-.html](https://www.cnn.com/2021/02/09/reddits-valuation-doubles-to-6-billion-after-new-250-million-funding-round-.html)

25 <sup>35</sup> <https://reddit.zendesk.com/hc/en-us/requests/new>

26 <sup>36</sup> [https://www.reddit.com/r/announcements/comments/gxas21/upcoming\\_changes\\_](https://www.reddit.com/r/announcements/comments/gxas21/upcoming_changes_to_our_content_policy_our_board/ft08mel/)  
27 [to\\_our\\_content\\_policy\\_our\\_board/ft08mel/](https://www.reddit.com/r/announcements/comments/gxas21/upcoming_changes_to_our_content_policy_our_board/ft08mel/)

28 <sup>37</sup> [https://old.reddit.com/r/ModSupport/comments/9h7w7u/reddithelpcom\\_now\\_has](https://old.reddit.com/r/ModSupport/comments/9h7w7u/reddithelpcom_now_has_a_moderator_complaint_form/)  
[\\_a\\_moderator\\_complaint\\_form/](https://old.reddit.com/r/ModSupport/comments/9h7w7u/reddithelpcom_now_has_a_moderator_complaint_form/)

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.<sup>38</sup> 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.<sup>39</sup> 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.”<sup>40</sup> Even when Reddit does agree with a moderator’s decision to flag

22 \_\_\_\_\_  
23 <sup>38</sup> [https://www.reddit.com/r/ModSupport/comments/bzpka6/how\\_understaffed\\_are\\_the\\_admins/er5j6xx/](https://www.reddit.com/r/ModSupport/comments/bzpka6/how_understaffed_are_the_admins/er5j6xx/)

24 <sup>39</sup> 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](https://www.reddit.com/r/Drama/comments/8r7qfj/terfs_are_trying_to_ban_pornography_off_of_reddit/eb444kx).

26 <sup>40</sup> [https://www.reddit.com/r/modhelp/comments/m5lrb/reddit\\_ok\\_with\\_sexualization\\_of\\_minors/](https://www.reddit.com/r/modhelp/comments/m5lrb/reddit_ok_with_sexualization_of_minors/)  
27  
28

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.<sup>41</sup>

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.<sup>42</sup> Conversely, a user claimed that they reported an account posting what  
8 appeared to be underage content, and the account remained online.<sup>43</sup>

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.<sup>44</sup>

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 <sup>41</sup> [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 <sup>42</sup> [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 <sup>43</sup> [https://www.reddit.com/r/WatchRedditDie/comments/fwlwpa/had\\_my\\_account\\_  
28 permanently\\_suspended\\_for/](https://www.reddit.com/r/WatchRedditDie/comments/fwlwpa/had_my_account_permanently_suspended_for/)

<sup>44</sup> [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.”<sup>45</sup>

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.”<sup>46</sup> Another employee, Erik Martin, likewise explained that  
18 he was responsible for dealing with the more “grisly content” including “sexualized  
19 images of minors.”<sup>47</sup>

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.

23  
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27 <sup>45</sup> <https://www.dailydot.com/society/reddit-beatingwomen-misogyny-images/>

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

<sup>47</sup> *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/picsofdeadjailbait<sup>48</sup>

## 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.”<sup>49</sup>

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 <sup>48</sup> [https://www.reddit.com/r/blog/comments/pmj7f/a\\_necessary\\_change\\_in\\_policy/](https://www.reddit.com/r/blog/comments/pmj7f/a_necessary_change_in_policy/)

28 <sup>49</sup> <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.”<sup>50</sup>

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 Violentacrex 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.”<sup>51</sup>

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

28 <sup>51</sup> <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.”<sup>52</sup>

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.<sup>53</sup>

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.<sup>54</sup>

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.”<sup>55</sup>

23  
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25 <sup>52</sup> <https://www.washingtonpost.com/news/the-intersect/wp/2014/09/03/does-reddit-still-have-a-child-porn-problem/>

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

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

28 <sup>55</sup> <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.”<sup>56</sup>

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           <sup>56</sup> <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

10 DAVIDA BROOK  
11 KRYSTA KAUBLE PACHMAN  
12 ARUN SUBRAMANIAN  
13 SUSMAN GODFREY L.L.P.

14 STEVE COHEN  
15 (*Pro Hac Vice forthcoming*)  
16 scohen@pollockcohen.com  
17 POLLOCK COHEN LLP  
18 60 Broad Street, 24th Fl.  
19 New York, NY 10004  
20 Phone: (212) 337-5361

21 By /s/ Krysta Kauble Pachman  
22 Krysta Kauble Pachman  
23 Attorneys for Plaintiff  
24  
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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  
KRYSTA KAUBLE PACHMAN  
ARUN SUBRAMANIAN  
SUSMAN GODFREY L.L.P.

STEVE COHEN  
POLLOCK COHEN LLP

By /s/ Krysta Kauble Pachman  
Krysta Kauble Pachman  
Attorneys for Plaintiff