

# Stop Trafficking!

# AwarenessAdvocacyAction

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FOCUS: This month's newsletter gives highlights of the 2025 Dirty Dozen Report.

The National Center on Sexual Exploitation (NCOSE) exists to build a world where people can live and love without sexual abuse and exploitation. Their mission is to:

- defend human dignity, believing that every human being deserves the opportunity to live life to its fullest potential.
- oppose sexual exploitation by mobilizing legal, corporate, and legislative action to build a world free from sexual abuse and exploitation
- expose the connections by attacking the roots of systems which support and sustain sexual abuse and exploitation



The Dirty Dozen List is an annual campaign usually calling out twelve mainstream entities for facilitating, enabling, and even profiting from sexual abuse and exploitation.

Since its inception in 2013, the Dirty Dozen List has spurred thousands of individuals to call on corporations, government agencies, and organizations to change exploitative policies and practices. This campaign has yielded major victories at Google, Netflix, TikTok, Hilton Worldwide, Verizon, Walmart, the US Department of Defense, and many more. This newsletter highlights the 2025 list, which does come with a twist from previous years.

The 2025 Dirty Dozen List presents a single call to action: to repeal Section 230 of the Communications Decency Act.

This year, instead of highlighting 12 companies that facilitate sexual exploitation, the Dirty Dozen List highlights 12 survivors who were denied justice in the courts because of Section 230 of the Communications Decency Act.

The scale of online sexual exploitation continues to increase, and the Internet persists universally as a tool used by perpetrators. The National Center for Missing and Exploited Children (NCMEC) **received over 186,000 reports** of online enticement of children for sexual abuse in 2023—a 300%+ increase since 2021. In 2024 alone, **NCMEC received 812 reports of sextortion per week**. Data confirms that most sex trafficking victims are advertised online. According to Thorn, about 35 percent of children under 18 years reported having an online sexual interaction, with about 25 percent of these interactions with an adult.

Section 230 of the Communications Decency Act is enabling these pervasive online crimes against children. Action against this law was one of the 12 targets of the 2024 Dirty Dozen List. As online crime against children continues to increase, the 2025 Dirty Dozen List emphasizes the crucial need for repealing Section 230 of the Communications Decency Act. This is not just a suggestion but a necessity for the safety of our children.



# Awareness

## Why is NCOSE Changing their Approach?

The Internet has become a more pervasive tool used by perpetrators for child exploitation. Last year, the National Center for Missing and Exploited Children (NCMEC) received 812 reports of sextortion per week. 1 in 8 adult Facebook users have been victims of nonconsensual distribution of sexually explicit material or threats to distribute this material. The online availability of AI-generated forged pornography (i.e. "deepfake" pornography) increased by 464% between 2022 and 2023.

**Section 230 is the reason.**

While the law was one of 12 targets on the 2024 Dirty Dozen List, it has become the primary focus of this year's campaign because ending Section 230 would curb exploitation of users across all tech platforms. The 2025 Dirty Dozen List presents a call to repeal Section 230 of the Communications Decency Act.

*No provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider.*

*Section 230(c)(1)*

## What is Section 230 of the Communications Decency Act?

In the United States, Section 230 is a section of the Communications Act of 1934 that was enacted as part of the Communications Decency Act of 1996 in the early days of the internet, which is Title V of the Telecommunications Act of 1996, and generally provides immunity for online computer services concerning third-party content generated by its users.

What once seemed a necessary legislative foundation for online business to thrive now stands to shield technology companies from being accountable, especially regarding the proliferation of sexual exploitation. Misinterpretations of Communications Decency Act Section 230 grant Big Tech immunity for sexual abuse and the exploitation they facilitate. Despite the rise of deepfake technology and the widespread application of AI, the law continues to allow blanket immunity from liability in an era of exponential internet growth. Corporations can't be held accountable until we amend Section 230 of the Communications Decency Act!

## CDA 230 and Exploitation

Sex trafficking and online exploitation have surged in the digital age, largely due to Section 230 of the Communications Decency Act.

Websites such as Backpage.com used Section 230 to avoid liability for sex trafficking. Backpage flourished on the exploitation of women and children. After years of relentless advocacy efforts, Backpage.com was eventually shut down by the Department of Justice, however other platforms quickly took over to facilitate the sex trade with no legal consequences.

Predators have used social media platforms to groom and exploit children, with no legal repercussions for the companies. For example, Facebook was responsible for 94% of online child grooming cases, while Snapchat also ignored reports of sextortion. Evidence of this willing and deliberate ignorance or negligence proliferates, as has often been highlighted through NCOSE's Dirty Dozen List campaigns.

Section 230 has also been cited in countless lawsuits brought by victims of image-based sexual abuse against hosting platforms like Reddit and Twitter. These sites have argued they cannot be held accountable for third-party content posted on their platforms, even when the content is non-consensual and harmful to individuals.

Without liability, tech platforms have no incentive to make the necessary safety reforms to protect their users.



## The 2025 Dirty Dozen list presents 12 Survivors silenced by Section 230

### **M.H. v. Omegle.com, LLC, 122 F.4th 1266 (11th Cir. 2024)**

During the COVID-19 lockdown, 11-year-old C.H. logged onto Omegle to chat with other children. After the call, she was randomly placed in another chatroom, where she could not see the other person. The person started to quickly rattle off C.H.'s personal information and threatened to hack her devices if she did not remove her clothes and sexually touch herself. She eventually complied while the perpetrator took screenshots. C.H. told her parents, who called the police and sued Omegle for allowing C.H. to be connected to an unknown adult man.

Even though it was Omegle's dangerous product design that allowed an 11-year-old to connect with an adult predator, their case never went anywhere.

Section 230 of the Communications Decency Act allowed Omegle to claim it was not responsible for users' behavior on its website.

This is why Section 230 MUST be repealed.

### **Doe #1 v. Twitter, Inc., No. 22-15103, No. 22-15104, 2023 WL 3220912, at \*1 (9th Cir. May 3, 2023)**

*John Doe met a stranger on Snapchat 13 years ago. Thinking this person was a girl at his school who had a crush on him, the two exchanged nude photos. But he was wrong. The "girl" was a sexual predator.*

*The predator began blackmailing John, requiring that he provide more sexually explicit content or have his photos released to his friends and family. John Doe eventually summoned up the courage to block the trafficker. "You're making a huge mistake," the trafficker told him.*

*Years later, John discovered his images and videos were posted on Twitter. He urgently requested their removal, providing proof of his identity and age at the time, but Twitter refused. The videos remained on the site, accruing over 167,000 views. Only after the Department of Homeland Security intervened did Twitter finally take them down.*

*Twitter knew CSAM depicting John was on its platform. Twitter knowingly possessed, distributed, and profited from illegal material.*

*When John sued Twitter for refusing to remove the illegal child sexual abuse material, the case was dismissed under Section 230 of the Communications Decency Act.*

*This is why Section 230 MUST be repealed.*

### **Does 1-6 v. Reddit, Inc., 51 F.4th 1137 (9th Cir. 2022)**

*Jane was 16 years old when she discovered her ex-boyfriend had shared, without her consent, sexually explicit images and videos of her on Reddit. She reported the content to Reddit and is seeking its removal. Even though it was considered illegal child sexual abuse material (CSAM), the content was not removed until days later.*

*However, her ex-boyfriend reposted the content, and when Reddit banned his account, he created a new account and continued to repost the material whenever it was taken down.*

*Jane filed suit against Reddit for failing to take adequate measures to prevent CSAM from spreading on its site. However, the court ruled that Section 230 gave Reddit immunity from liability and that it could not be sued even for profiting from CSAM. Due to Section 230 of the Communications Decency Act, the case was dismissed.*

*This is why Section 230 MUST be repealed.*

# Advocacy

***Doe (K.B.) v. Backpage.com, LLC, 2025 WL 719080, Case No. 23-cv-02387-RFL (N.D. Cal. Mar. 3, 2025)***

*K.B. met a stranger on Instagram who began sending her direct messages and posting comments on her Instagram page. The statements he posted consisted of commonly known grooming tactics, but Instagram failed to monitor these messages, even though they had the technology to do so. K.B.'s trafficker suggested meeting up in person, and within two days of their first meeting, he began to sex traffic Jane Doe on Instagram.*

*The accounts used to sex traffic and advertise K.B. were created under fake names and still exist on the platform to this day. Even after K.B.'s direct trafficker was convicted and sentenced to 40 years, Instagram still has not removed the trafficker's Instagram account.*

*When Jane Doe sued the platform for its faulty product features that contributed to her trafficking, the case was dismissed because of Section 230 of the Communications Decency Act.*

*This is why Section 230 MUST be repealed.*

***Doe v. Kik Interactive, 482 F. Supp. 3d 1242 (S.D. Fla. 2020)***

Jane Doe, a minor, downloaded the Kik messaging app, naive. Jane began receiving messages from strange adult men on Kik. They sent her sexually explicit images of themselves and coerced her to do the same.

When Jane's father discovered what was happening, he reported the behavior to the police immediately. They also sued Kik for facilitating this sexual abuse, as Kik knew its site was being used to sexually exploit children but did not implement policies to help stop this.

Due to Section 230 of the Communications Decency Act, Kik was able to avert any accountability.

This is why Section 230 MUST be repealed.

***Doe v. WebGroup Czech Republic, A.S., No. 2:21-cv-02428, 2024 WL 3533426, at \*1 (C.D. Cal. July 24, 2024)***

*Jane was a victim of sex trafficking as a teenager. Her trafficker repeatedly assaulted her and forced her to record sexually explicit videos of herself, which he later uploaded to pornography websites.*

*This child sexual abuse material (CSAM) was viewed on multiple pornographic sites over 160,000 times. Jane reported the CSAM to the pornography websites several times, but only after Jane got an attorney involved did they take it down.*

*Jane sued these websites, which exploited her trauma for financial gain, for failing to remove illegal child sexual abuse material after her repeated requests.*

*However, Jane was denied justice due to Section 230 of the Communications Decency Act.*

*This is why Section 230 MUST be repealed.*

COMMUNICATIONS DECENCY ACT  
**SECTION 230**



*Doe No. 1 v. Backpage.com, LLC, 817 F.3d 12 (1st Cir. 2016)*

*Backpage was known for online advertisements selling things like personal items, cars, and sex trafficking victims.*

*Jane Doe was sex trafficked as a minor on Backpage. The website had an “Escort Services” section where users could find “local postings.” These postings were tailored to a user’s location information, allowing users to find ads of women and girls in their area.*

*Advertisements of the underage Jane were posted on Backpage, and inquiries from sex buyers led to her being raped over 1,000 times. Jane Doe sued Backpage for allowing this sex trafficking to occur, for facilitating sex trafficking by making it easier for users to sell people online, and for financially benefiting from the illegal behavior.*

*But courts dismissed her case under Section 230 of the Communications Decency Act.*

*This is why Section 230 MUST be repealed.*

**L.W. v. Snap Inc., 675 F. Supp. 3d 1087 (S.D. Cal. 2023)**

C.A. was only 12 years old when an adult man groomed her on Twitter and then on Snapchat. Though the perpetrator had already previously been charged with engaging in illegal sexual behavior with minors, Snapchat allowed him to create an account. The predator inundated C.A. with child sexual abuse material (CSAM) and then directed her into making a CSAM of herself and sending it to him. Following these digital exchanges, this child predator sought out C.A. at her home and sexually molested her, recording the acts and distributing them online.

When C.A.’s family filed a lawsuit against Snapchat, the court ruled that Snapchat was immune from facing consequences for its users’ actions due to Section 230 of the Communications Decency Act.

This is why Section 230 MUST be repealed.

**J.B. v. Craigslist, Inc., No. 22-15290, 2023 WL 3220913, at \*1 (9th Cir. May 3, 2023)**

J.B.’s trafficker advertised her on Craigslist’s “Erotic Services” webpage. Sex buyers raped J.B., some who inflicted physical violence upon her and threatened her with weapons. One night, a man came up to the hotel room to sexually abuse her. When she cried out for help, a hotel customer overheard and called the police. However, J.B. knew that if she got her trafficker in trouble with the police, he may kill her. She pleaded with the police not to arrest him, so they left. The hotel allowed the trafficker to stay with J.B. in the hotel room.

J.B. eventually filed a lawsuit against Craigslist, accusing them of knowingly allowing minors to be trafficked on their platform and alleging that they financially benefited from the ads and made “an estimated \$36 million in revenue” from trafficking on its site.

When J.B. brought her claims to court, the court ruled that Craigslist had immunity under Section 230 of the Communications Decency Act.

This is why Section 230 MUST be repealed.



# Advocacy

## **Doe v. Grindr Inc., 128 F.4th 1148 (9th Cir. 2025)**

When he was 15, John Doe downloaded and created an account on Grindr. Despite being younger than the platform's professed age limit of 18, there was little verification process. All he had to do was check a box to claim he was over 18. Grindr did not verify John's age when he signed up for an account. Instead, it welcomed the child onto the app and geolocated him; upon downloading the app, Grindr matched John with four unknown adult males. When he met up with the men in person, they raped him several times.

When John Doe and his family filed a lawsuit against Grindr for facilitating this child sexual abuse, the court dismissed the case under Section 230 of the Communications Decency Act.

This is why Section 230 MUST be repealed.

### ***Doe v. Snap, Inc., No. H-22-00590, 2022 WL 2528615, at \*1 (S.D. Tex. July 7, 2022)***

*John had a turbulent childhood; his father left him, and his mother was tragically murdered. At age 15, a female teacher sensed that John was vulnerable. After getting John alone in a room after class, she was able to get his Snapchat account username. She began messaging him on the app, sending sexual pictures of herself. Their interactions escalated to the teacher sexually abusing John in person. She gave John money to buy certain prescription drugs, which she used before molesting him. Until one day, he overdosed.*

*During John's recovery in the hospital, his legal guardian sued multiple defendants, including Snap, Inc., alleging that Snap failed to prevent the teacher's abusive behavior and designed an application that allowed sexual predators to thrive.*

*However, the court ruled that Snap could not be held liable because of Section 230 of the Communications Decency Act.*

*This is why Section 230 MUST be repealed.*

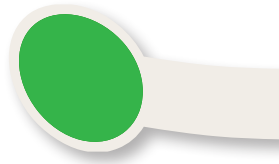
### ***In re Facebook, Inc., 625 S.W. 3d 80 (Tex. 2021)***

*At the age of 15, Jane met a stranger on Facebook. She and this man had a lot of mutual Facebook friends; however, his profile featured many pictures of young women in sexual positions. The man messaged Jane on Facebook frequently, always complimented her, and urged her to pursue a career in modeling.*

*Taking advantage of Jane's vulnerability after a family argument, the man offered her a position as a model and said they should meet in person. When they met, he took photos of her in sexual positions, like the ones of the girls on his Facebook profile. The stranger then uploaded the photos to Backpage and advertised her for prostitution, which for a minor is always sex trafficking, and Jane Doe was "raped, beaten, and forced into further sex trafficking."*

*Despite Facebook's dangerous features that allow adult predators to easily connect with minors, when Jane Doe filed a lawsuit against the company for facilitating sex trafficking, the case was dismissed under Section 230 of the Communications Decency Act.*

*This is why Section 230 MUST be repealed.*



## NCOSE 2024 Victories

In 2024, because of the response to actions included in the Dirty Dozen list, readers have initiated enormous victories in the fight against corporate-facilitated sexual exploitation. Some of these [victories are listed below](#).

The day after Meta was placed on the 2024 Dirty Dozen list, they announced the automatic blurring of nude images in Instagram direct messages for minors under 18, a measure that NCOSE is urging them to extend to all minors on Facebook and WhatsApp. This proactive step is a testament to Meta's commitment to child safety.

In October, Instagram, a leading platform for sextortion, took proactive steps to protect teens. It began blocking potential scammers' accounts from following teens, denying them access to sections of a person's profile which are often used for blackmail in sextortion schemes.

Finally, Meta introduced Instagram Teen Accounts, which include default safety settings for teens. Teen accounts are automatically set to private, and they cannot interact with users with whom they are not connected.

Google, the world's most popular search engine, has implemented measures to protect victims of sexual exploitation. It filters 'deepfake' explicit images when reported, automatically scans for and removes duplicate sexually explicit images, and demotes the search rankings of websites with a high volume of removal requests.

Google also strengthened its online child safety measures by adopting Safety by Design Generative AI principles and enhancing AI safety protocols to stem the creation and dissemination of AI-generated child sexual abuse material (CSAM) and announced partnerships to support the U.S. Department of Homeland Security's Know2Protect campaign and the National Center for Missing and Exploited Children (NCMEC)'s No Escape Room Safety to combat sexual extortion (sextortion).

Last May, just a month after the Dirty Dozen List was released, Microsoft's GitHub initiated a policy prohibiting projects that are "designed for, encourage, promote, support, or suggest in any way" the creation of Image-Based Sexual Abuse (IBSA) including DeepFaceLab, which hosted the code used to create 95% of deepfakes and sent users directly to the most prolific sexual deepfake website, MrDeepfakes.

Since being named to the 2024 Dirty Dozen List, Apple has removed four "nudifying" apps from the App Store, and LinkedIn removed "nudifying" bot ads and articles from their platform.

To reduce the risk of sextortion, Snapchat will issue a pop-up warning if someone who has been blocked or reported by others or is from a region outside of a teen's typical network is trying to friend them.

Cash App was named to the 2024 Dirty Dozen List for being the top financial service used for sextortion, buying, and selling of CSAM, and other forms of sexual exploitation. They have since hired an Anti-Human Exploitation Program Manager. This role has been filled by a former employee of the International Justice Mission and the National Center for Missing and Exploited Children (NCMEC). Based on recommendations from NCOSE, Cash App also requires birthdays, uses machine learning to estimate age, makes teen accounts "unfindable" without knowing their exact "cashtag," and has expanded parental controls, including the options of blocking certain accounts and preventing teens from making peer-to-peer payments. The company has also updated its user policy to ban Image-Based Sexual Abuse and is expanding partnerships with law enforcement and the National Center for Missing and Exploited Children.

Urge Congress to  
Remove Section  
230 Immunity to  
Stop Online Sexual  
Exploitation!



Please click [here](#) to contact your legislator  
and ask them to repeal Section 230!



### The National Center for Missing & Exploited Children

is a private,  
nonprofit organization  
established in 1984 by the  
United States Congress.

NCMEC is the nation's  
largest and most influential child protection  
organization.



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