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April 26, 2023

Jamie Iannone CEO, eBay 2025 Hamilton Ave San Jose, CA 95125

Re: eBay named to 2023 Dirty Dozen List for selling child sex abuse dolls and spy cams advertised for filming women without their knowledge

Dear Mr. Iannone.

We write to inform you that the National Center on Sexual Exploitation is placing eBay on the 2023 Dirty Dozen List – a campaign that names 12 mainstream contributors to sexual exploitation and abuse. NCOSE —a non-partisan nonprofit in Washington, DC dedicated to addressing the full spectrum of sexual exploitation—recognizes the influence eBay has in the retail market and calls on your company to improve policies and practices. This year's Dirty Dozen List will be revealed on Tuesday, May 2, 2023.

We are deeply concerned that eBay is providing a platform for and profiting from products that normalize child sexual abuse, promote image-based sexual abuse, and grossly objectify women. Furthermore, lack of filters exposes users to pornography and other sexually explicit content (real and depicted). While we commend eBay for having several strong policies on paper against certain forms of exploitation, they are not being enforced.

At a time when we are suffering a worldwide epidemic of child sex abuse¹ and witnessing an increase in violence against women² and girls,³ we call on eBay to prioritize your customers' and the global community's well-being over your bottom line. As the second most visited online marketplace, eBay has a responsibility to stand against sexual exploitation as other companies in your industry have done. Please stop selling sexual exploitation and abuse on your platform for a profit.

We recommend the following changes to eliminate exploitation on eBay:

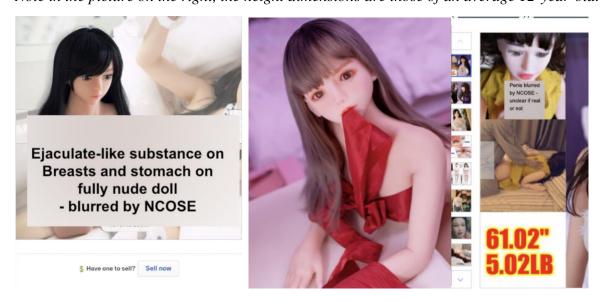
- 1. Remove all products that normalize child sexual abuse and permanently ban sellers
- 2. Ban and remove all sex dolls, since allowing these items promotes the objectification of women and inevitably results in childlike sex abuse dolls being sold
- 3. Prohibit products and advertising that encourage recording women without their knowledge or consent and add explicit policies against promoting image-based sexual abuse
- 4. Enforce existing policies, such as eBay's ban on pornography and listing requirements under your "adult items policy" including blurring nudity (depicted or actual) or sexually explicit images; sellers violating policies should be prohibited from using your platform
- 5. Develop a filtering mechanism to protect users who do not wish to see explicit content and set it as the default

Recommendation 1: Remove all products that normalize child sexual abuse and permanently ban sellers

Because sex dolls are permitted on eBay, many sellers have predictably fashioned dolls which resemble children and teens, thereby catering to and encouraging pedophilic tendencies and normalizing child sex abuse. While searches for "child sex doll" or "teen sex doll" do not yield young-looking sex dolls, a quick scan of search results for "sex doll," "adult doll," etc. yields a number of dolls that look like young girls and preteens. Several of the seller descriptions even indicate they are selling childlike sex abuse dolls by using thinly disguised phrases such as "school girl," advertising dolls wearing school uniforms or surrounded by stuffed animals, and/or selling dolls with dimensions and characteristics of children or preteens.

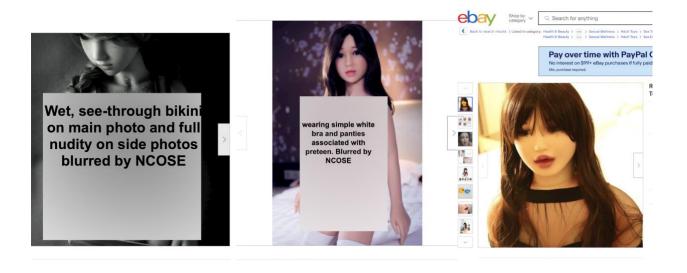
Below is a small sample of the evidence we collected, which we will also be posting along with additional proof to our website, and sharing it on social media. We have blurred the images – a courtesy to you that eBay does not offer its users.

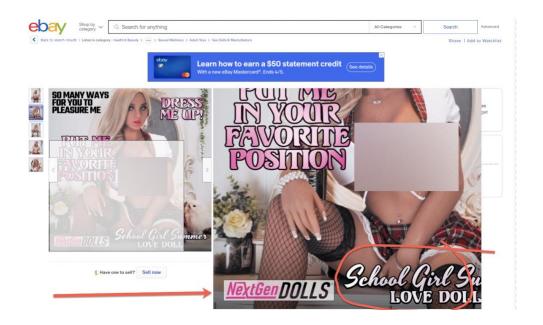
Note in the picture on the right, the height dimensions are those of an average 12-year-old.

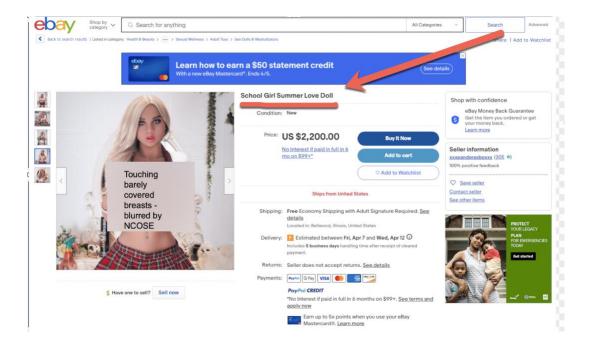


Childlike sex abuse dolls are an extension of child sexual abuse. In fact, researchers <u>Brown and Shelling</u> note that **childlike sex abuse dolls may actually increase the likelihood that a pedophile will act out on a**

real child.⁴ Childlike sex abuse dolls may bridge the gap between viewing child sexual abuse materials and sexually assaulting a real child. Because dolls provide no emotional feedback, the use of child sex dolls may desensitize the user to the horrific harms of child sexual assault. Research into sex addiction has demonstrated that compulsive sexual behavior in males is characterized by novelty-seeking and desensitization; more extreme acts are necessary to maintain the same level of arousal.⁵ A pedophile may start using childlike sex abuse dolls after becoming desensitized to watching child sexual abuse materials online. When he inevitably becomes desensitized to dolls, he may begin victimizing real children.







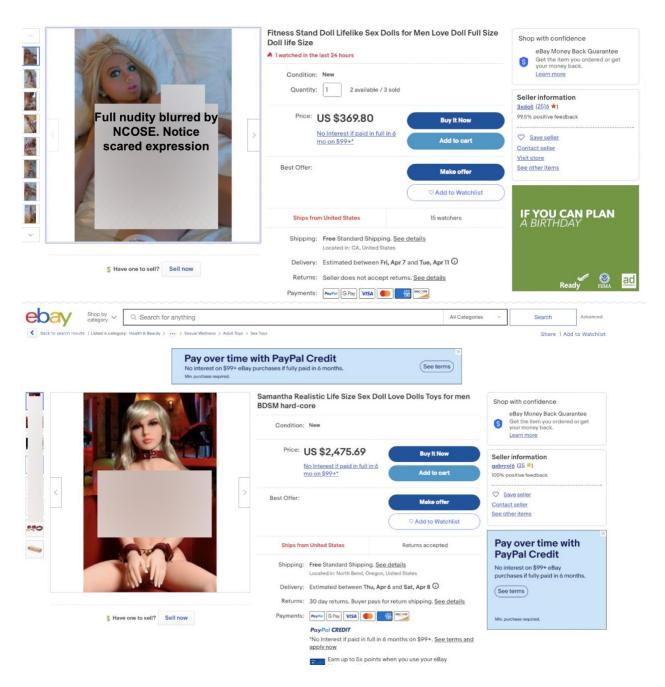
Ultimately, child sex abuse dolls normalize and commodify child sexual assault. They should not be sold at all, and certainly not on mainstream sites like eBay. In fact, a growing number of countries and states are rightly making buying and selling of child sex abuse dolls illegal: Florida, Kentucky, and Tennessee all passed laws banning childlike sex abuse dolls in 2019, and Hawaii and South Dakota followed in 2021. Most recently, Utah passed HB 108, which would ban the possession, distribution, or purchase of child sex abuse dolls. The bill sailed through both chambers of the legislature without a single lawmaker opposing it, and is now awaiting the governor's signature.

We call on eBay to remove all products that normalize child sexual abuse and permanently ban sellers of these products.

Recommendation 2: Ban and remove all sex dolls, since allowing these items promotes the objectification of women and inevitably results in childlike sex abuse dolls being sold

<u>Caitlin Roper</u>, a globally recognized authority and author on the topics of sex dolls and sex robots, has examined why some men purchase sex dolls. According to her findings, men like that the dolls "are always sexually available, that they allow men to have sex whenever and however they want, that they [the men] are calling all the shots, they don't have to…consider anyone else's feelings or needs or humiliation or pain…."

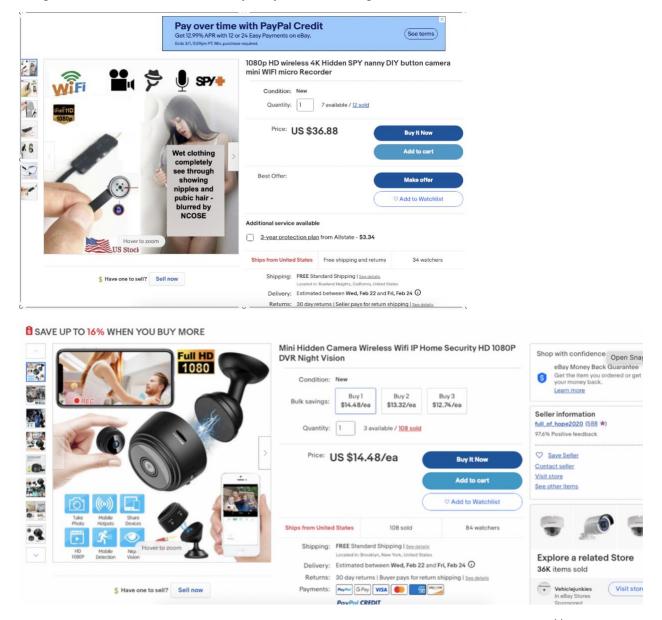
The sex dolls being sold on eBay literally turn women and children into sex objects. As <u>Dr. Maras and Dr. Shapiro</u> note in the *Journal of Internet Law*, sex dolls "have the potential of altering individuals' views and perceptions of relationships, ultimately, having them interact with humans as they would with the dolls and robots."



Furthermore, pedophiles are known to use adult sex dolls and child sexual abuse materials to groom children they intend to assault. eBay may very well be assisting pedophiles in the abuse of children – as other top online retailers no longer sell sex dolls. Amazon has scrubbed their marketplace of all sex dolls. Wish no longer sells sex dolls in its online marketplace. Etsy has created an explicit policy against products that promote the sexual exploitation of children and has largely removed sex dolls from its site. It's time for eBay to follow suit in prohibiting the objectification of women and children through the sale of sex dolls.

Recommendation 3: Prohibit products and advertising that encourage recording women without their knowledge or consent and add explicit policies against promoting image-based sexual abuse

NCOSE researchers found multiple spy cameras (also called spycams or hidden cameras) on eBay that are advertised with images of women showering or engaging in sexual activity. It is abundantly clear that these tools are being promoted specifically to film women without their knowledge by the very names and descriptions of the products: "spy," "hidden," "nanny cam," "night vision." eBay allowing marketing that encourages criminal behavior is highly disturbing — especially given that the posting of nonconsensually filmed sexual content on the internet is rapidly escalating and causing untold trauma. This is a form of image-based sexual abuse that eBay may be facilitating.



<u>Image-based sexual abuse is a growing global crime with lasting, traumatic impact</u>. ¹⁴ Once uploaded to the internet, the nonconsensual footage can never be fully erased, as it is downloaded, duplicated, and shared over again. <u>Survivors of IBSA</u> describe their experiences as "life-ruining," "hell on earth," and "a

nightmare...which destroyed everything."¹⁵ An informal survey by the Cyber Civil Rights Initiative found that 51% of responding IBSA victims reported having contemplated suicide as a result of their experience.¹⁶

The NCOSE Law Center is currently co-counsel <u>representing nine women who were filmed in a locker room without their knowledge or consent</u>. ¹⁷ The man who filmed them changing and showering used a spy cam similar to those being sold on eBay. The footage was then uploaded to XHamster and Pornhub. This is just one example of spy cameras being used as a tool for image-based sexual abuse—and as "Spy cam," "Hidden camera," and "Voyeur" are popular genres of pornography, we know that countless others have been victimized by the use of spy cams to film them without their consent.



By selling spy cams that advertise nonconsensually filmed images, eBay may be complicit in image-based sexual abuse. When notified of this problem on their own platform in 2021, Wish took action by creating and enforcing an <u>explicit ban</u> against "spy cams advertised for unlawful activities" like IBSA. ¹⁸ We urge eBay to follow suit.

Recommendation 4: Enforce existing policies, such as eBay's ban on pornography and listing requirements under your "adult items policy" – including blurring nudity (depicted or actual) or sexually explicit images; sellers violating policies should be prohibited from using your platform

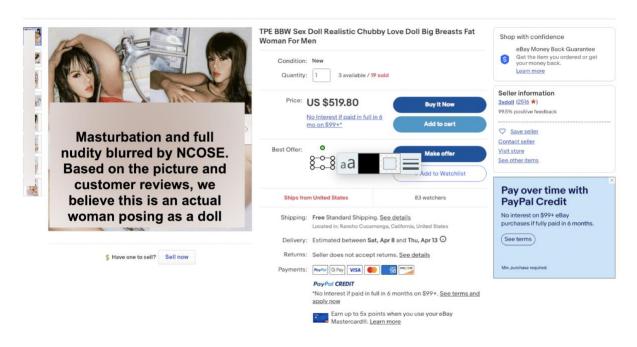
Despite pornography being prohibited in eBay's policies, pornography and other sexually explicit content is easily found on eBay.

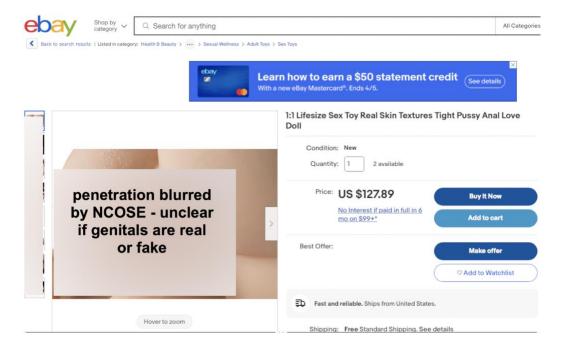
According to <u>eBay's Adult Items Policy</u>, "listings [of sex toys and sexual accessories] must not include images of nudity or sexual content." This policy is clearly not being enforced. In addition to *countless* explicit nude images being sold on eBay that do not classify as art (despite sellers throwing "art" into the title), but are meant to sexually arouse (i.e., pornography), NCOSE's researchers found that eBay's listings for sex dolls include graphic images of sex acts such as oral sex and masturbation. These images are so lifelike and meant to stimulate that we would argue they qualify as pornography. Countless products include sexually explicit imagery in the main thumbnail image – including genitalia and sex acts – and include pornographic text in the listing.

In addition to several of the images above that included graphic images of sex acts, here are some other samples. Again, this does not even include the multitudes of additional sex dolls and nude photos sold on eBay that are indisputably pornography.



In the image below, the woman's fingers are clearly inserted into her vagina. As noted in the picture, based on details in the image (such as cellulite, stretch marks, indicators of body hair, inconsistent wrinkles, etc.) and the customer reviews, we highly suspect this is a photo of a real woman being advertised as a doll.





The text that accompanied the "Summer School Girl Love" child sex abuse doll masturbating (pictured earlier in this letter)

Item description from the seller

School is out for Summer, but she still has lots to learn! Take her home and teach her all the things they won't teach her in class! A true Exclusive, she's designed for those who want to bring their fantasies to life! She's beer the object of desire and envy for so many boys and girls, but for you she can be your prized student! Her well developed, large breasts and pink nippies are longing to be touched, squeezed and pinched. Her buxom booty is perky and sits high up so it's ready to be slapped and grabbed. Her meaty vulva and pink lips provide that extra cushion as you penetrate her tight buthole and her vaginal love canals. Her mouth is open, waiting to be kissed or to give you oral pleasure. When you look into her wide-eyed, light blue eyes you can see she's eager to learn and pleasure you! She's built with a realistic body of TPE and stainless steel armature that allows you to touch her and feel her soft skin while posing her in countiess positions! From her head to her toes, she's designed to be beautiful and seductive. Dress her up in your favorite outfits to customize her look. She comes with a babydoil lingerie and G-string set, a comb, a mani-pedik lif or her nails, and the long, blonded wig you see her pictured with. To further enjoy her, she also comes with a warming stick and a vibrating bullet.

She sits on the desk, her legs slightly parted. Her outfit reveals luscious thighs, large breasts and curves that she doesn't realize are driving you wild. She's got a look of innocence that makes you want to take it gentle but also ravish her. "Teach me," she says as you take her hand and lead her to bed. She wants to learn everything about pleasuring you and you have to control your excitement so you don't rip off her clothes. You lay her on her back and enjoy taking her clothes off slowly, then revealing her large, swollen uvlave that is just begging to be filled and stretched. Her heavy breasts weigh her down so you lift them up and play with them. Holding her waist, you lift her up so she can wrap her lips around you. Then, you flip her over, supporting her body with a pillow, and give it to her in Doggy Style. Flipping her over, you wrap her arms and legs around you as you get deep inside her from the front, your face buried in her large breasts, until you collapse beside her, gasping and panting, all your tension released. You relax and smile knowing that this is just the beginning of her lessons with you.

When you're not filling her holes, enjoy her as a companion! Dress her up, brush her hair, do her nails by giving her mani-pedi, or sit her next to you on the couch or bed as you watch your favorite shows together! Hold her close as the perfect cuddle partner or left her in on your most intimate thoughts in conversation. When you want to put her away, wrap her up gently in the fleece blanket to protect her delicate skin and handle her using the allowes provided. Use the douche builb to rinse out and clean her love tunnels after thet've been played with.

eBay's <u>Adult Items Policy</u> states that all sellers of sex toys and accessories must be pre-approved and that "seller accounts are automatically reviewed for pre-approval at the time of attempting to list in these categories." If this is true, we are confused at how childlike sex dolls and pornographic content is still surfacing on eBay in clear violation of your policies. We urge you to enforce your own policies by banning listings and sellers that include sexually explicit content. We also ask that you require sellers to blur nude images in the main listing thumbnail so users – especially children – are not exposed to sexually explicit content upon deliberate or accidental searches.

Recommendation 5: Develop a filtering mechanism to protect users who do not wish to see explicit content – and set the filter as the default

eBay currently has no filter for sexually explicit content. Considering that sexually explicit imagery is used in the main thumbnails of many products, eBay needs to create a reliable and effective filtering mechanism to obscure nude/sexually explicit search results – as well as other content meant for adults (e.g., sex toys). While we understand (and commend) that eBay has set an 18+ policy, the reality is that children are still

accessing your site – especially given that Apple App Store and Google Play have set the eBay age rating as 12+ and Teen, respectively. We ask you to blur sexualized nudity and pornography of all kinds. We also ask you to set this filter option as the default, so that users are automatically protected from this content unless they choose to see it.

We hope that eBay will join its industry peers in making the principled choice to stop profiting from products that normalize and even facilitate sexual exploitation and abuse. We urge you to make the changes outlined above, which would improve the safety of your platform and disassociate your brand from violence against women and children.

Respectfully,

Patrick Trueman, Esq.

Dawn Hawkins

Mur Haukum

President CEO

Cc:

Eddie Garcia, SVP, Chief Product Officer

Marie Oh Huber, SVP, Chief Legal Officer, General Counsel & Secretary

Stefanie Jay, SVP, Chief Business & Strategy Officer

Julie Loeger, SVP, Chief Growth Officer

Antoine Jouteau, CEO, Adevinta

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¹ Paige Sutherland, Meghna Chakrabarti, and Tim Skoog, "Child Sexual Abuse Material is on the Rise Online. Will Lawmakers and Big Tech Finally Act?" *WBUR On Point*, February 16, 2023, https://www.wbur.org/onpoint/2023/02/16/the-rise-of-child-sex-abuse-material-and-what-lawmakers-and-the-tech-industry-can-do-to-stop-it.

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³ Centers for Disease Control and Prevention (CDC), "U.S. Teen Girls Experiencing Increased Sadness and Violence," news release, February 13, 2023, https://www.cdc.gov/media/releases/2023/p0213-yrbs.html.

⁴ Rick Brown and Jane Shelling, *Exploring the Implications of Child Sex Dolls*, Australian Institute of Criminology (Canberra, Australia: Trends & Issues in Crime and Criminal Justice, 2019), https://www.aic.gov.au/sites/default/files/2020-05/ti570 exploring the implications of child sex dolls.pdf.

⁵ Ian P. Albery et al., "Exploring the Relationship between Sexual Compulsivity and Attentional Bias to Sex-Related Words in a Cohort of Sexually Active Individuals," *European Addiction Research* 23, no. 1 (2017), doi:10.1159/000448732.

⁶ Prohibited Acts in Connection with Obscene or Lewd Materials, Florida Senate 2019, CS/SB 160, https://www.flsenate.gov/Session/Bill/2019/00160.

⁷ An Act Relating to Crimes and Punishments, Kentucky General Assembly 2019 Regular Session, SB 102, https://apps.legislature.ky.gov/record/19rs/sb102.html.

 $\frac{https://wapp.capitol.tn.gov/apps/Billinfo/default.aspx?BillNumber=SB0659\&ga=111\#:\sim:text=(3)\%20Knowing\%20transport\%20of\%20a,fine\%20of\%20\%2410\%2C000\%20to\%20\%2450\%2C000.$

https://www.researchgate.net/publication/321137227 Child Sex Dolls and Robots More Than Just an Uncanny Valley.

²⁰ Ibid.

⁸ Tennessee General Assembly 2019, SB0659/HB1168,

⁹ A *Bill for an Act Relating to Childlike Sex Dolls*, Hawaii Senate Thirty-First Legislature 2021, SB 834, https://www.capitol.hawaii.gov/sessions/session2021/bills/SB834 CD1 .HTM.

¹⁰ Establish the Crime of Possession, Manufacturing, or Distribution of Obscene Dolls, South Dakota Legislature 2021, SB 126, https://sdlegislature.gov/Session/Bill/22193.

¹¹ *Child Sex Doll Prohibition*, Utah State Legislature 2023 General Session, HB 108, https://le.utah.gov/~2023/bills/static/HB0108.html,

¹² NCOSE, "Sex Dolls: Objectifying Women and Fueling Child Sexual Abuse," The 2022 Dirty Dozen List: Etsy, accessed April 21, 2023, https://endsexualexploitation.org/etsy.

¹³ Marie-Helen Maras and Lauren Shapiro, "Child Sex Dolls and Robots: More Than Just an Uncanny Valley," *Journal of Internet Law* (2017),

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¹⁵ Clare McGlynn et al., "'It's Torture for the Soul': The Harms of Image-Based Sexual Abuse," *Social & Legal Studies* 30, no. 4 (2021), doi:10.1177/0964663920947791.

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