

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

WOODHULL FREEDOM FOUNDATION,)
HUMAN RIGHTS WATCH, ERIC KOSZYK,)
JESSE MALEY, a/k/a ALEX ANDREWS, and)
THE INTERNET ARCHIVE,)

Plaintiffs,)

v.)

THE UNITED STATES OF AMERICA)
and JEFFERSON B. SESSIONS, in his)
official capacity as ATTORNEY GENERAL)
OF THE UNITED STATES,)

Defendants.)

Case No. 1:18-cv-1552

**DECLARATION OF DR. JESSICA P. ASHOOH IN SUPPORT OF
PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, Dr. Jessica P. Ashooh, hereby declare as follows:

1. I am the Director of Policy at Reddit, a position that I have held since June 2017. I am responsible for overseeing Reddit’s public policy and government relations work. In 2018, my role also entailed primary responsibility for the development of Reddit’s Content Policy, as well as providing operational guidance on the Policy’s day-to-day enforcement.

2. Reddit is a user-generated content platform that allows users to create communities of shared interest, known as “subreddits,” through which they can share content with other members of the community. There are more than 130,000 communities on Reddit.

3. These communities are created and moderated by the users themselves on a volunteer basis, not by Reddit employees. The users choose the subject matter of each subreddit and write their own often highly detailed rules tailored to the unique needs of their members and

interests. For example, the r/movies subreddit has rules in place detailing the method by which users must warn others if their post contains a plot spoiler. Moderators are empowered to remove any post that does not follow their rules. As a result of this system, more than 99.7% of all non-spam content removals on Reddit are undertaken by users themselves, rather than by employees of Reddit.

4. Overarching these individual subreddit rules is the Reddit Content Policy—the sitewide rules by which all communities and users on Reddit must abide. It is developed and enforced by Reddit employees. In the case of subreddits, if the community itself inherently violates the Policy, it may be banned from the platform. Reddit is constantly evaluating its Content Policy, updating it from time to time to account for new trends in user behavior or in response to legislation. We have made seven updates to the Policy since October 2017.

5. One of the updates we made, on 21 March 2018, involved the creation of a new policy forbidding the use of Reddit to solicit or facilitate any transaction involving certain goods and services. Specifically included in the policy were “paid services involving physical sexual contact.” The impending enactment of the Allow States and Victims to Fight Online Sex Trafficking Act, which passed the Senate on the same day, was a factor in this update.

6. Overall, this law has led us to be much stricter in the banning of subreddits created by our users that might be misconstrued as promoting or facilitating prostitution. In general, our usual practice for subreddits that may be borderline with regard to our Content Policy is to first warn the moderators of a problem and try to work with them to bring the community more clearly into compliance. However, the vagueness and scope of liability of the new law gave us little opportunity to engage in this process with certain types of subreddits, lest our actions be

interpreted as knowingly assisting, supporting, or facilitating the activity. We have banned a number of subreddits as a result, reluctantly shutting down what we believe were valuable harm reduction resources for vulnerable communities.

7. An example of this is the r/escorts community, which we banned on 22 March 2018 as a result of the new policy. At the time of the ban, it was a well-moderated community of approximately 8,000 subscribers, “with a focus on education, safety, and health for clients and providers alike,” as set out by the community’s moderators. The moderators also had specific rules forbidding providers from advertising their services, including a ban on posting links to external provider websites, profiles, and reviews. The moderators’ rules also forbade requests from potential clients to help find providers. Despite these precautions by the moderators, we felt obligated to ban it due to the potential risk of liability it presented under the new law. Its loss removed an important discussion space for voluntary sex workers trying to stay safe.

8. I declare under penalty of perjury of the laws of the State of California and the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on this 27th day of August 2020 at San Francisco, California.

A handwritten signature in dark ink, appearing to read "Jessica P. Ashooh", with a long, sweeping horizontal line extending to the right from the end of the signature.

Dr. Jessica P. Ashooh