

AMENDED Exhibit 1167

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

8/14/2018, 10:36 PM UTC

Labels

type: document

Quip

Grooming on Snapchat

Questions

- How do offenders find individuals to groom?
- Repeat offenders? (We can re-vamp device blocking measures)
- Any links to tickets for grooming? (as examples/case studies)
 - search in ZD (Trust and Safety): tags:ts-all-abuse-1 tags:ts-impersonation-1b tags:ts-reported-content-2 tags:ts-rso order_by:created sort:desc groom
- search in ZD (Law Enforcement): tags:leo-abuse-reviewed leo-abuse order_by:created sort:desc groom
- <https://snapchat.zendesk.com/agent/tickets/28035635>
- <https://snapchat.zendesk.com/agent/tickets/23499795>
 - How can we compute stats for grooming tickets?
 - How long is our retention on these things?
 - Tools for banning
 - Device ID targeting

Why 30 day retention for in-app-reporting? Why not longer?

Caveats: limited infrastructure to ascertain grooming activity; numerous sources of grooming reports (ZD + in-app), as well as numerous terminologies for it

How they find:

- (Potential) Quick Add
- (Potential) Reddit or other forums - gamifying snap score
- (Potential) Instagram or other social media where they reveal handle

Potential Mitigations

Ordered by either high impact or low FPs.

- Better job blocking devices
- Scanning Chat Media text before delivering and inserting a warning message on certain texts
- Blocking certain "Add Friend" events
 - Maybe computing something like "add-back" ratio (assuming groomers have a low add-back ratio) for each user
- Possibly also checking if a user is trying to break into a lot of disparate social networks
- It might be slightly tricky differentiating between a groomer and a new Snapchat user in high school
 - On-device detection

Additional potential proactive measures flagging grooming behavior (this was done at FB)

- Victim's age x 2 - 7 = Suspect's age (the objective was to have sufficient buffer between victim/suspect age)
 - If 1:1 message between a 15yo and 23yo or over, combined with flagged chat messages or media, flag for review.
 - If victim is 14yo, and suspect age is 21 or over, flag
- If victim is 13yo, and suspect age is 19 or over, flag
 - Use of 3rd party app (Snaplion: locked for 3rd party) can be another potential marker for grooming behavior

Shadowing [REDACTED]

How would you protect against this?

How often do unsolicited genitals photos occur?:

<https://snapchat.zendesk.com/agent/tickets/28550835>

Occurs frequently, stated in various ways. 'keeps sending me sexual pictures' 'naked images' 'nude photos,' etc

In some cases the parent will write in indicating that the victim is a minor

Inappropriate stories?

Master policy

doc: https://docs.google.com/document/d/1JpY7oYSsv0cAawUzDAflx6B1IB7VYkfz_gGn43TB7FY/edit?usp=sharing

Tier 2 Snap Deletions: <https://lk.sc-corp.net/> [REDACTED]

NCMEC: <https://lk.sc-corp.net/> [REDACTED]

Metadata of Grooming on Snapchat

Thread class

document

Created

2018-08-14T22:36:13+00:00

Updated

2021-06-25T11:38:49+00:00

Link

<https://snapchat.quip.com/fDTCAP7KECHr>

Expanded users

Agatha Baldwin, [REDACTED], Juliet Shen [REDACTED]

Users

Agatha Baldwin, [REDACTED] Juliet Shen [REDACTED]

Urls

- <https://snapchat.zendesk.com/agent/tickets/28035635>
- <https://snapchat.zendesk.com/agent/tickets/23499795>
- <https://snapchat.zendesk.com/agent/tickets/28550835>
- https://docs.google.com/document/d/1JpY7oYSsv0cAawUzDAflx6B1IB7VYkfz_gGn43TB7FY/edit?usp=sharing
- https://lk.sc-corp.net/explore/customer_operation/customer_ops_iaa?qid=2pgejdC4RGmr08LwASeCda&toggle=fil
- https://lk.sc-corp.net/explore/customer_operation/customer_ops_iaa?qid=3rHRQYi9dSJUSGNNGLaYSH&toggle=fil

Chat

Edits

[REDACTED] edited at 2018-08-22T19:01:41.709Z

- Occurs frequently, stated in various ways. 'keeps sending me sexual pictures' 'naked images' 'nude photos,' etc
- In some cases the parent will write in indicating that the victim is a minor
- Master policy doc:
https://docs.google.com/document/d/1JpY7oYSsv0cAawUzDAflx6B1IB7VYkfz_gGn43TB7FY/edit?usp=sharing

• Tier 2 Snap Deletions: <https://lk.sc-corp.net/explore/> [REDACTED]

• NCMEC: <https://lk.sc-corp.net/explore/> [REDACTED]

[REDACTED] edited at 2018-08-22T16:29:01.155Z

- Shadowing [REDACTED]
- How would you protect against this?
- How often do unsolicited genitals photos occur?:
<https://snapchat.zendesk.com/agent/tickets/28550835>
- Inappropriate stories?

edited at 2018-08-21T20:25:23.959Z

- Why 30 day retention for in-app-reporting? Why not longer?

edited at 2018-08-20T17:56:08.356Z

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- Additional potential proactive measures flagging grooming behavior (this was done at FB)
- Victim's age x 2 - 7 = Suspect's age (the objective was to have sufficient buffer between victim/suspect age)
 - If 1:1 message between a 15yo and 23yo or over, combined with flagged chat messages or media, flag for review.
 - If victim is 14yo, and suspect age is 21 or over, flag
 - If victim is 13yo, and suspect age is 19 or over, flag
 - Use of 3rd party app (Snaplion: locked for 3rd party) can be another potential marker for grooming behavior

edited at 2018-08-15T23:40:50.700Z

- (Potential) Quick Add
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- (Potential) Reddit or other forums - gamifying snap score
- (Potential) Instagram or other social media where they reveal handle

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- Potential Mitigations
- Ordered by either high impact or low FPs.
- Better job blocking devices
- Scanning Chat Media text before delivering and inserting a warning message on certain texts
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- Maybe computing something like "add-back" ratio (assuming groomers have a low add-back ratio) for each user
- Possibly also checking if a user is trying to break into a lot of disparate social networks
- It might be slightly tricky differentiating between a groomer and a new Snapchat user in high school
- On-device detection

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edited at 2018-08-15T23:25:11.431Z

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- Caveats: limited infrastructure to ascertain grooming activity; numerous sources of grooming reports

edited at 2018-08-15T23:12:39.782Z

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- Why 30 day retention for in-app-reporting

Juliet Shen edited at 2018-08-15T23:05:44.656Z

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- How they find:
- (Potential) Quick Add
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edited at 2018-08-15T23:05:24.782Z

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- How they find:
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edited at 2018-08-15T22:17:40.423Z

- Any links to tickets for grooming? (as examples/case studies)
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edited at 2018-08-15T19:26:40.751Z

- Repeat offenders? (We can re-vamp device blocking measures)
- Any links to tickets for grooming? (as examples) examples/case studies)
- How can we compute stats for grooming tickets?
- How long is our retention on these things?
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edited at 2018-08-15T00:44:10.856Z

- Grooming on Snapchat
- TODO - Questions
- How do offenders find individuals to groom?

- Repeat offenders?
- Any links to tickets for grooming? (as examples)
- How can we compute stats for grooming tickets?
- Tools for banning
- Device ID targeting
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██████████ edited at 2018-08-14T22:36:18.336Z

- Grooming
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- TODO -
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