

Jane Doe v. Kik Interactive Inc. et al

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.: 0:20cv60702**

JANE DOE, a minor

Plaintiff,

v.

KIK INTERACTIVE INC., a Canadian Corporation,  
MediaLab.Ai Inc., a Delaware Corporation

Defendants.

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**COMPLAINT**

COMES NOW, PLAINTIFF, Jane Doe, a minor by and through her undersigned counsel, files this Complaint and sues KIK INTERACTIVE INC. (KIK INTERACTIVE) and MediaLab.Ai Inc. (MediaLab) and states:

**JURISDICTION AND VENUE**

1. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§1331,1338(b), in that this action arises under: Allow States and Victims to Fight Online Sex Trafficking Act of 2017 (“FOSTA”), 47 USC § 230(5); Communications Decency Act of 1996, 47 U.S.C. § 230, et seq.; 18 U.S.C. §1595 and 18 U.S.C. §1591.
2. This Court has personal jurisdiction over Defendants since Defendants have engaged in most if not all of the complained of acts in this judicial district.
3. Venue is proper in the Southern District of Florida pursuant to 28 U.S.C. §§1391(b) and (c) because the effects of Defendants' actions have caused and will cause damage to the Plaintiff occurred in this judicial district.

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4. All conditions precedent to bringing the instant action have occurred, been performed and/or have otherwise been excused, satisfied, or waived.

### **PARTIES**

5. At all relevant times Plaintiff, Jane Doe was a minor with a date of birth of August 20, 2005 and a resident of Broward County, Florida. Jane Doe is a victim of sexual trafficking.

6. Kik Interactive Inc. (“Kik Interactive”) is a Canadian corporation having a principal place of business at 420 Weber Street North, Suite I, Waterloo, Ontario N2L 4E7, Canada with offices in New York City and Tel Aviv. At all relevant times Kik Interactive was Kik Messenger’s owner and operator.

7. MediaLab.Ai Inc. (“MediaLab”) is a Delaware Corporation with the principal place of business at 1240 Morningside Way Venice CA 90291. On or about October 21, 2019 MediaLab acquired Kik Messenger from Kik Interactive and is Kik Interactive’s successor in interest who, for the purposes of this action, either stands in the same shoes as Kik Interactive or partakes in Kik Interactive’s liability<sup>1 2</sup>. MediaLab is Kik Messenger’s current owner and operator.

(<https://www.media-lab.ai>):

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<sup>1</sup> Crawford Harbor Assocs. v. Blake Const. Co., 661 F. Supp. 880, 883 (E.D. Va. 1987) (“[T]he practical feature of any theory of corporate successor liability . . . is that the consequences of the predecessor's acts are visited upon the successor.”)

<sup>2</sup> Noel v. Terrace of St. Cloud, LLC, 212 F. Supp. 3d 1193, 1204 (M.D. Fla. 2016) (“... [Defendant] states that it was unfair to allow Plaintiff to try its case under the theory that Terrace could be held liable for the conduct of [predecessor in interest]. [Defendant argued that it lacked notice that the plaintiff will be proceeding on the successorship theory of liability.] [Defendant’s] argument is unfounded [...] as Plaintiff’s Amended Complaint clearly premised liability against Terrace as Southern Oaks’ successor-in-interest.”)

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### **KIK MESSENGER**

8. Defendants Kik Interactive and MediaLab as its successor in interest, marketed and currently markets a voice and messaging application (or “app”) under the name “Kik Messenger” known simply as “Kik.” Kik can be downloaded to a mobile device through sites such as Google Play, the Apple App Store, the Microsoft App Store, and Amazon app store.

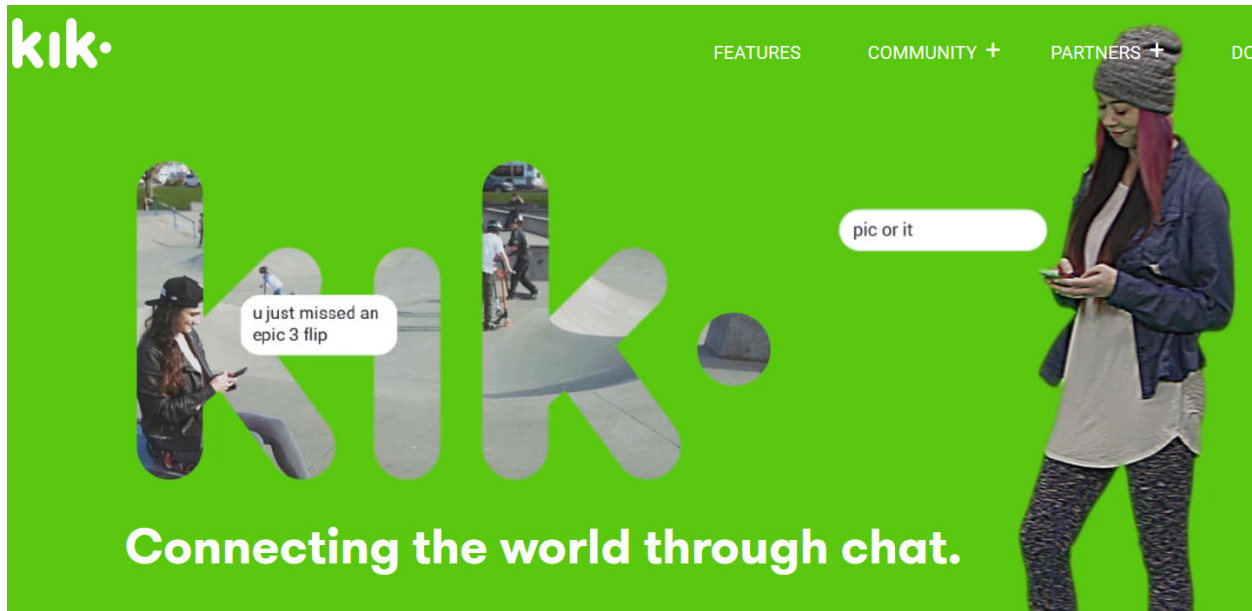
9. Kik uses a smartphone’s data plan or Wi-Fi to transmit and receive messages, photos, videos, sketches, mobile webpages, and other content after users register a username. Kik is known for preserving users’ anonymity since it allows users to register without providing a telephone number. As of May 2016, Kik Messenger had approximately 300 million registered users, and was used by approximately 40% of United States teenagers.<sup>3</sup>

10. Defendants Kik Interactive and MediaLab specifically target children and young adults as the primary Kik users. The slogan prominently displayed across Kik’s homepage stated, at relevant to this action time, “Connecting the world through chat.”

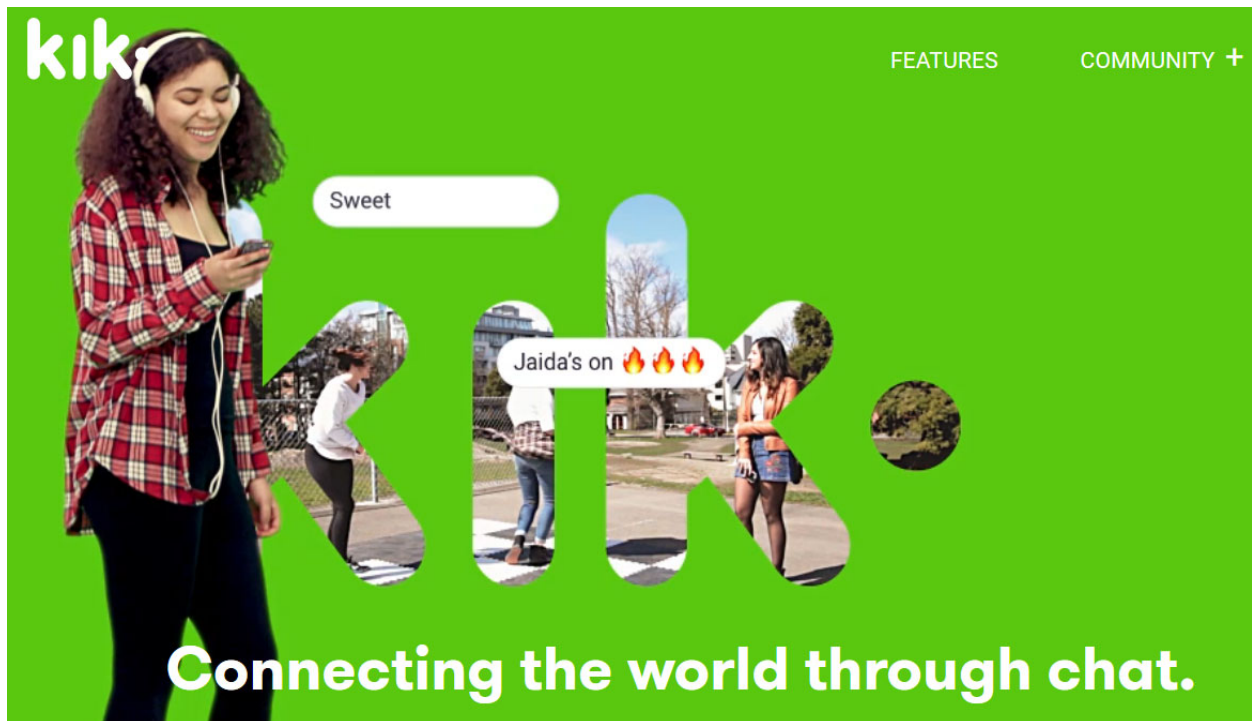
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<sup>3</sup> “Today [May 11, 2016], onstage at TechCrunch Disrupt NY, Kik CEO Ted Livingston divulged some insights on how Kik has been growing over the past year. Namely the platform, which was recently given a \$1 billion valuation, now boasts more than 300 million registered users, growing from 200 million in January of last year. He also revealed that Kik, which reaches 40 percent of U.S. teens, now boasts more than six thousand bots.” <https://techcrunch.com/2016/05/11/kik-already-has-over-6000-bots-reaching-300-million-registered-users/> (As of March 30, 2020).

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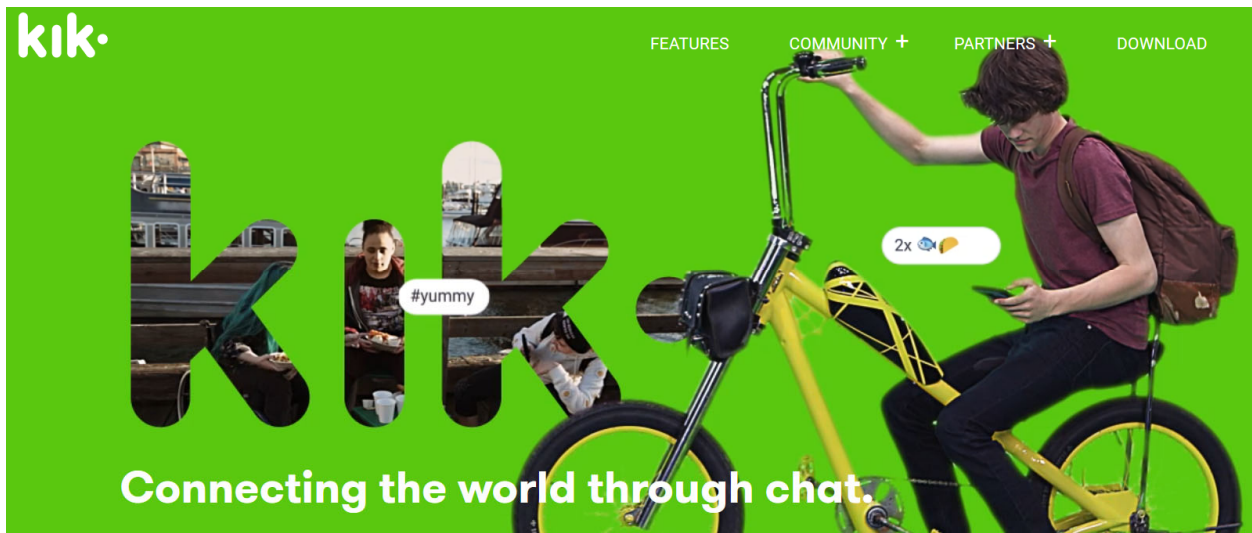
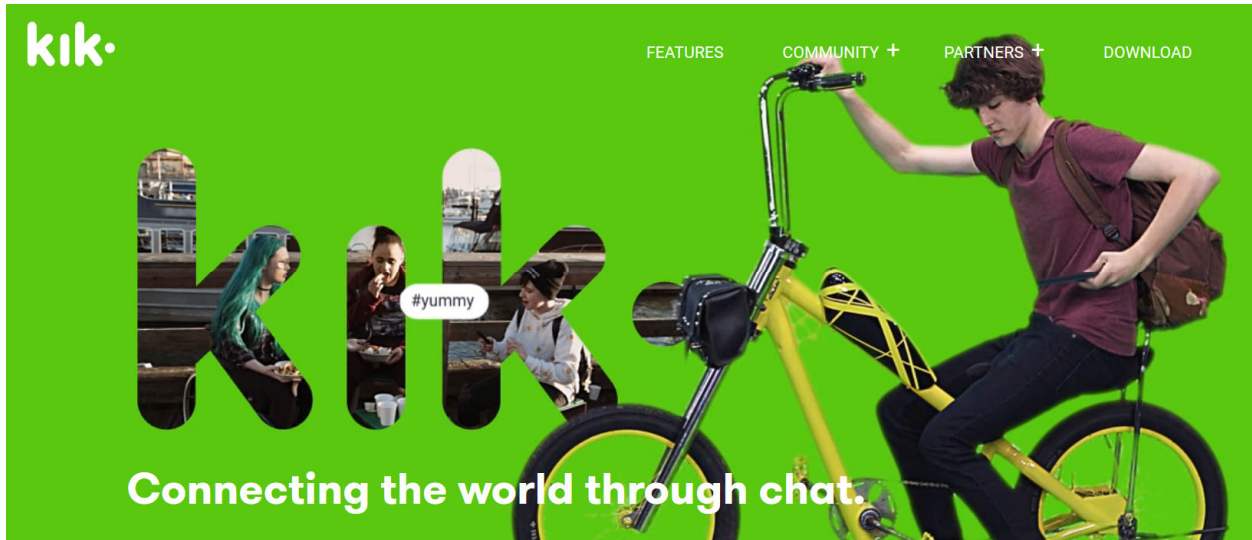


The images or video-footages on Kik’s homepage, depict middle or high school looking children engaged in very “teenage” activities such as: dancing hip-hop type dances



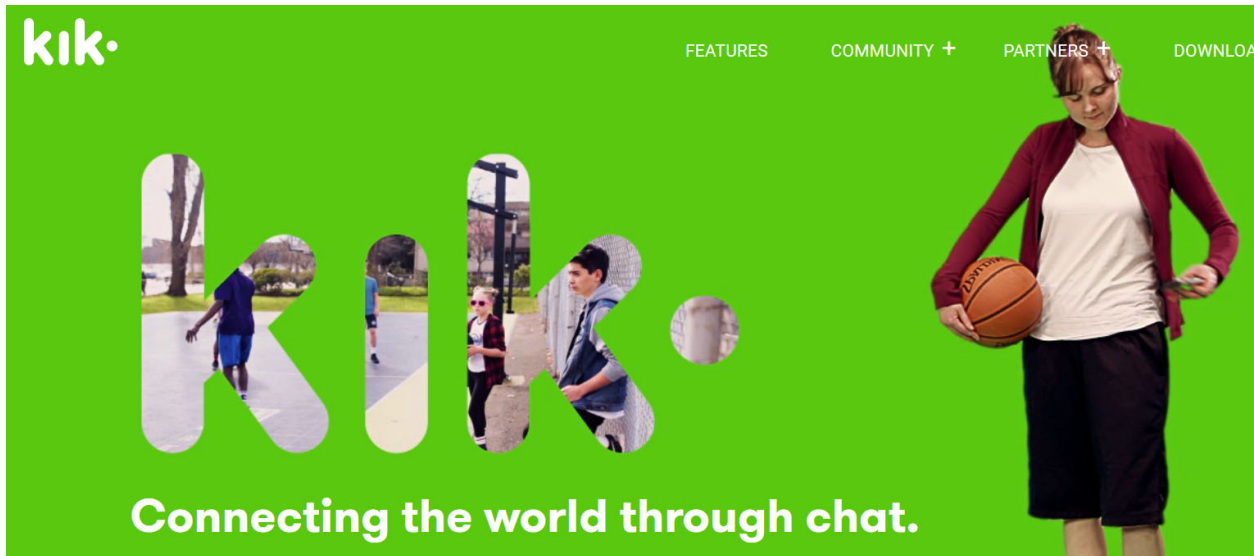
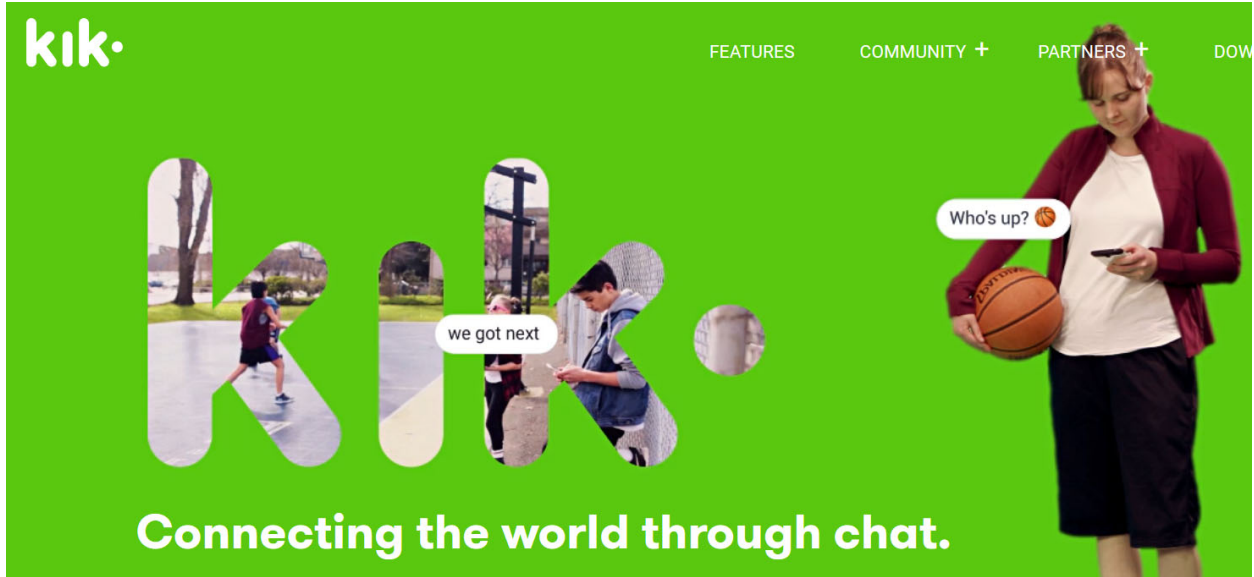
eating fast-food, riding mountain bikes

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playing basketball, leaning up against a chain-link fence usually installed around schools

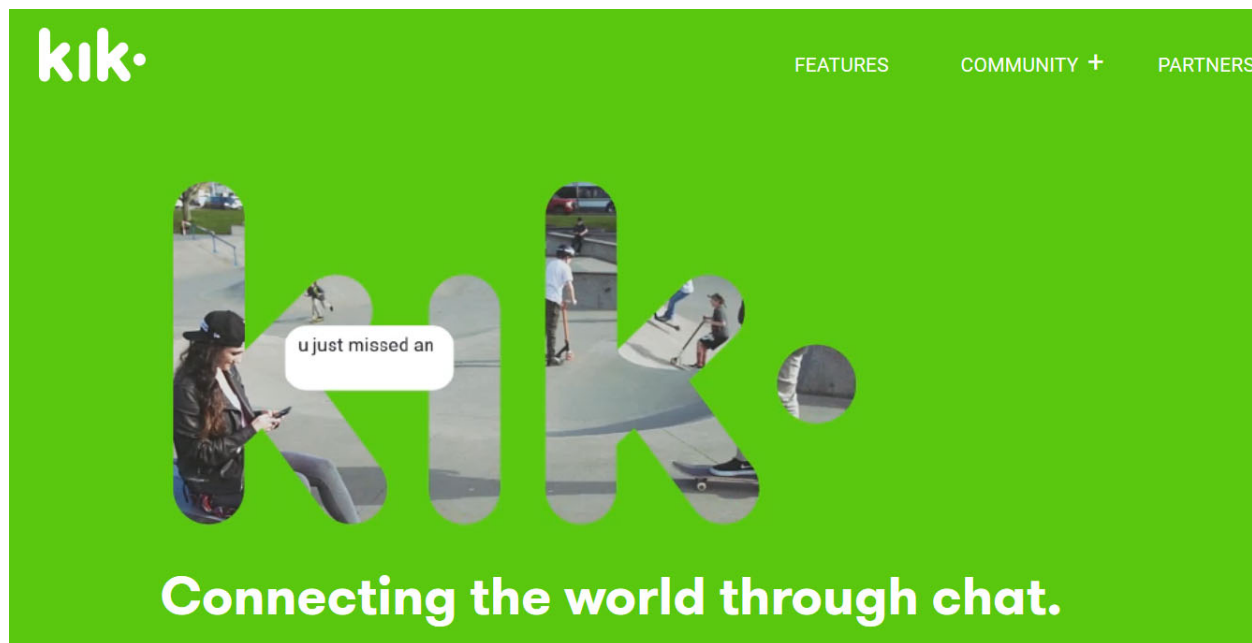
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riding skateboards, riding scooters



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to name a few.

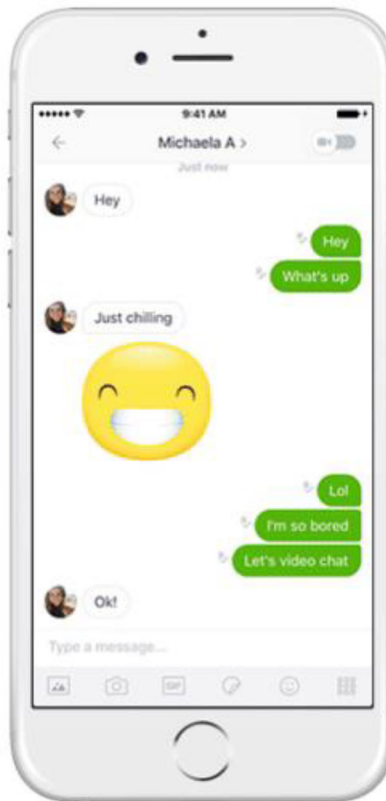
**Source:** <https://www.kik.com/>.

All these activities are taking place in conjunction or against the background of middle or high school looking children using Kik text messaging to interact with each other utilizing emojis and predominantly teenage-based texting lexicology. It is foreseeable and logical that children of Jane Doe’s age, attracted to the images and footages of teenagers looking “cool” and “hip” using Kik to interact with each other while engaging in the above-named activities, would and did become a substantial segment of Kik users.

11. Consequently, Kik Interactive and MediaLab as its successor in interest, through their own specifically designed marketing strategy, knew or should have known that a substantial segment of Kik users are children of Jane Doe’s age. In fact, as early 2016, Kik Interactive knew that Kik reaches 40 percent of U.S. teens.

12. The following illustration shows a typical text messages exchange session between two Kik users.

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**Source:** <https://blog.kik.com/2016/12/19/video-chat-with-your-friends/>

13. A child as young as 13 can open a Kik account without a parent's or a guardian's approval or supervision.

14. Kik Interactive's article titled *How old does my teen need to be to use Kik?* states the following:

Your teen will be asked to enter their birthday when they create their account. If the birthday entered is for someone younger than 13, the account won't be registered.

Children under the age of 13 are prohibited from having a Kik account, by the Kik [Terms of Service](#). If your child is under 13 and has created a Kik account, please submit a deactivation request to Kik by emailing [safety@kik.com](mailto:safety@kik.com). Please use the subject line 'Parent Inquiry' and include your child's Kik username and age in your message.



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If Kik obtains knowledge that a user is under the age of 13, it's our policy to permanently deactivate their account and delete their personal information.

If you're the parent or legal guardian of a teen that's using Kik without your permission, and you want to have your teen's account deactivated, please check out the "[How can I deactivate my teen's account](#)" FAQ.

For more details on eligibility and age, you can check out our [Terms of Service](#) and [Community Guidelines](#).

**Source:** <https://help.kik.com/hc/en-us/articles/217681788-How-old-does-my-teen-need-to-be-to-use-Kik->

Although this article pretends to address a parent or a guardian and purports to play a lip service to concerns for the user-child's safety, given a complete freedom a child as young as 13 has in opening a Kik account without an adult's approval or supervision, such a concern is disingenuous at best.

### **DEFENDANTS' WRONGFUL ACTS**

#### **KIK INTERACTIVE'S AND MediaLab's KNOWLEDGE THAT KIK IS WIDELY USED BY SEX OFFENDERS TO COMMIT ACTS OF VIOLENCE AGAINST CHILDREN, DISTRIBUTE CHILD PORNOGRAPHY AND COMMIT CHILD ABUSE AND THEIR FAILURE TO PROVIDE ADEQUATE WARNING AND INSTITUTE ADEQUATE MEASURES TO PROTECT THE UNDERAGE USERS OF KIK MESSENGER SUCH AS JANE DOE**

15. The article by Thomas Brewster titled *This \$1 Billion App Can't 'Kik' Its Huge Child Exploitation Problem*, published by the Forbes Magazine on Aug 3, 2017, talks about an avid Kik user and a registered sex offender, Thomas Paul Keeler II<sup>4</sup> who was "a member of more *than 200 Kik groups* with names like "kidsnbabies," all dedicated to trading child abuse material, including

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<sup>4</sup> On October 10, 2017 Thomas Paul Keeler, II was sentenced to 240 months in prison, lifetime of supervision upon release and a \$5,000.00 fine for the Receipt of Child Pornography. United States v. Keeler (5:16-cr-00307-H) District Court, E.D. North Carolina.

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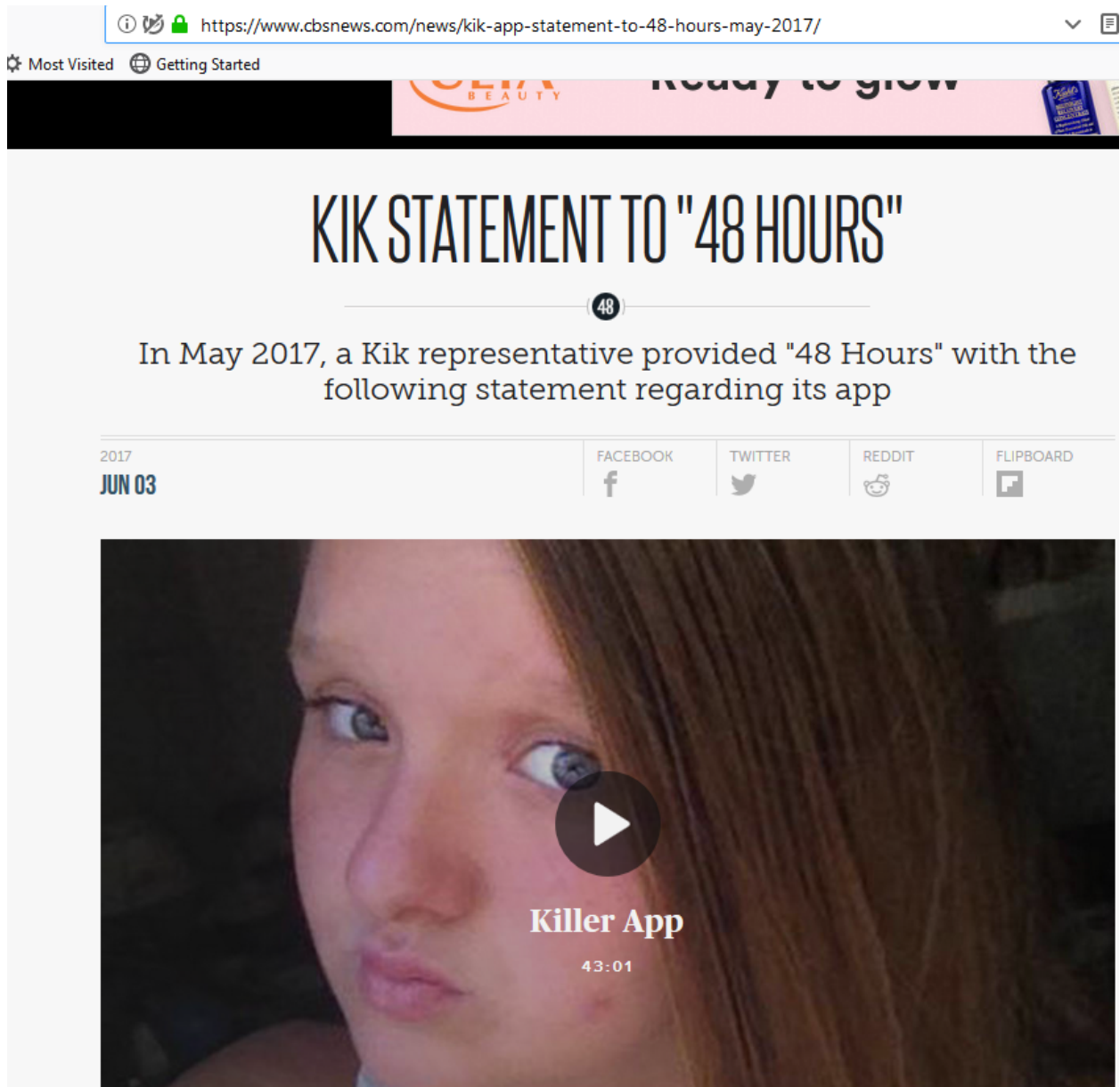
images and videos of minors aged between three and 12 engaged in sexual acts with adults.” The Forbes pointed out that, although “the astonishing level of illegal content might appear unique [...] in recent years this kind of activity has become rampant across Kik.” Thomas Brewster, in his article, quotes a convicted child molester telling CBS News' 48 Hours that Kik is a “predator's paradise.”

**Source:** <https://www.forbes.com/sites/thomasbrewster/2017/08/03/kik-has-a-massive-child-abuse-problem/#217a24991a14>

16. The same article mentions the case of Nicole Lovell, a 13-year-old girl killed in January 2016 who communicated with her killers over Kik. 13 year-old Nicole Lovell disappeared from her family's home in Blacksburg, Virginia after climbing out of her bedroom window during the early morning hours of January 27th, 2016. Prior to that morning, Nicole told her friends that she was planning to sneak out to meet up with her new 18 year-old boyfriend named David whom she met on Kik. This David was later identified as David Eisenhauer, an 18 year-old freshman at Virginia Tech. Hours after Nicole climbed out of her bedroom window, her parents found her bedroom empty, her window open, and a drawer pushed up to her windowsill to help her climb outside. They immediately reported her missing. Investigators immediately began interviewing Nicole's friends and neighbors. A few of those friends mentioned Nicole's plan to meet up with an older boy named David. Three days later, David Eisenhauer was arrested. David admitted to meeting Nicole using Kik and to driving to her home during the early morning hours of January 27th to meet up. He said that he believed Nicole was 16 or 17 years old, but when he saw her that morning, he realized she was much younger and decided to leave. Investigators did not buy this story, and charged David with Nicole's abduction. Shortly thereafter, Nicole's body was found on the side of the road near the Virginia/North Carolina border. She had been stabbed to death. David was then charged with murder in addition to abduction.

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17. The use of Kik as a platform to hurt and exploit children reached such a level of notoriety that in June 2017 CBS News' 48 Hours made an episode titled *Killer App* examining utilization of Kik by sex offenders to commit despicable crimes against children, against the backdrop of Nicole Lovell's murder.<sup>5</sup>



<sup>5</sup> "'48 Hours' investigates the murder of 13-year-old Nicole Lovell and the hidden dangers of meeting strangers online in 'Killer App'"

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**Source:** <https://www.cbsnews.com/news/kik-app-statement-to-48-hours-may-2017/>

18. In May 2017, in response to 48 Hours' episode, Kik Interactive issued a written statement stating:

*We take online safety very seriously, and we're constantly assessing and improving our trust and safety measures.* Nicole Lovell suffered a terrible tragedy and our sincere condolences continue to go out to her family. Since the time of the incident, Kik has taken a variety of proactive measures to help increase safety on our platform.

There are two ways we do this. One is through technology and constant improvements to the product itself. *We encourage users to report content that they believe violates the Kik Terms of Service and Community Standards.*

*Users are also able to Block other users they no longer wish to chat with, or ignore chats from people that they don't know.* Actions are taken against users found to have violated Kik's Community Standards and TOS, including removal from the Kik platform where circumstances warrant.

*The other is through education and partnerships with organizations that help adults and teens understand the challenges of today's online landscape and how to avoid bad situations.* For years, we've had teams dedicated to this, and we will continue to invest in those types of tools, provide resources to parents, and strengthen relationships with law enforcement and safety-focused organizations. This is a priority for us. We want all users to be safe on Kik and will continue to make Kik a safe, positive and productive place for our users to interact.

**Source:** <https://www.cbsnews.com/news/kik-app-statement-to-48-hours-may-2017/> (Emphasis added).

19. Kik Interactive's statement not only lacks any concrete details regarding the "safety measures" supposedly taken by the Defendant to make Kik "a safe, positive and productive place", but also shows blatant, irresponsible and fundamental disregard for the problem of criminally minded adults preying on vulnerable and, often times, deeply hurt children using Kik. This blatant, irresponsible and fundamental disregard is apparent in Kik Interactive's claim that Kik is somehow safer now since the Kik's users are able to "block other users they no longer wish to chat with, or

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ignore chats from people that they don't know” where these “users” are the children whose emotional vulnerability, family background, fear, shame, age and inexperience prevents them from blocking, reporting or in any way disassociating themselves from these predators. In other words, Kik Interactive expects the victims and the potential victims to take initiative in “blocking” and “reporting.”

20. Sadly and disturbingly the cases of the sex offender Keeler and a child murder victim, Nicole Lovell are just a mere few in a super-long line of cases involving the use of Kik as a tool to hurt and exploit children not just in the United States but in other countries around the globe:

On May 1, [2013] the ICE [The Saskatchewan Internet Child Exploitation] unit executed a search warrant resulting from a complaint about a young girl being exploited via her cellphone on an app called KIK Messenger. Jason McLean, 18, of Saskatoon is charged with three counts of possession of child pornography, three counts of accessing child pornography, three counts of creating child pornography, invitation to sexual touching, criminal harassment and extortion.”

Four men face child porn charges, Saskatoon Star Phoenix (Canada), 2013 WLNR 11486975

POLICE in Plymouth [UK] have issued a warning about pedophiles abusing a social networking website to contact children. Detectives have seen a worrying rise in people allegedly using the phone messaging app 'Kik' to contact youngsters with the aim of committing sexual offences. Devon and Cornwall Police have recorded 18 cases in the force area involving grooming or arranging to meet with a child - four recent reports came from Plymouth. Investigators say the majority of the unsolicited approaches have been made by a complete stranger to the child. Det Con Neil Albrechtsen, from Plymouth's Child Abuse Investigation Team, said the first reported case involving Kik in the force area was in November 2011. In 2012 that figure had risen to four but in the first five months of 2013 there have been 13 cases - four of which involve Plymouth children. Police and parents warning about new smartphone app being used by pedophiles [sic] to groom children[.]

Police and parents warning about new smartphone app being used by pedophiles to groom children. Plymouth Evening Herald (UK) May 25, 2013, 2013 WLNR 12914217

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In another interview with [Plymouth, PA] police, Stout admitted to sharing images of child pornography with a group he met through the KIK application and said he had about 200 images and between five and 10 videos on his phone, according to the affidavit.

Friend turns in man after seeing child porn on phone, 12/21/13 Citizens' Voice, The (Wilkes-Barre, PA), 2013 WLNR 31901090

The Pasco County Sheriff's Office called a news conference Wednesday to detail two arrests in recent child pornography cases. The 13-year-old girl sent the photos using an iPhone app called Kik, said sheriff's Detective William Lindsey. The app is popular among young teens - since not all parents trust them with fully equipped smartphones - because it works through Internet connections. That means a child with only an iPod or a computer can send texts or pictures using the app.

Pasco Detectives Arrest 2 In Child Pornography Cases, 2/20/14 Tampa Bay Times (Fla.) 1B2014 WLNR 4710967

[A 35-year-old Hoquiam, WA man] was arrested at his home Jan. 28. [The man] told detectives his Tumblr account had recently been deactivated, and he had used five other accounts on the site to search for girls. He said he used a phone app called Kik to trade child pornography.

Hoquiam man charged with child porn, 3/4/14 Daily World (Aberdeen, Wash.), 2014 WLNR 5934047

Glen Ardell Douglas, Jr., 36, was arrested Wednesday on suspicion of sexual exploitation of a child and booked into the El Paso County jail, records show. The tip stated that someone using the screen name "skyeeye719" had been chatting about molesting children in a smartphone app called "the lobby," and used the app "KiK" to send child pornography images to a person in Missouri, police said. Detectives traced the IP address to a residence on the 1900 block of Hallam Avenue in Security, east of U.S. 85/87. Douglas



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allegedly admitted to using the screen name and email address after a search warrant was executed at his home and police found digital images of child pornography, police said.

Security man accused of possession, distribution of child porn, 5/15/14 The Gazette (Colorado Springs, CO), 2014 WLNR 13141616

On May 12, [2014] authorities say, Michael Edward Thomas, [26] sent an image of two children between the ages of 1 and 10 through an account on Kik Messenger to a Polk County resident. The incident was reported to the local Sheriff's Office, which obtained a subpoena for the chat information and IP address. They traced it back to a residence at 12029 Timber Lane. Deputies say Thomas' image was included in the chat conversation.

Man Jailed on Child Porn Charges, 6/20/14 Tampa Bay Times (Fla.) 3B, 2014 WLNR 16788949

Austen M. Mayfield, [19] pleaded guilty in Stark County Common Pleas Court and was sentenced June 30, [2014] by Judge Frank Forchione to 12 months in the Lorain Correctional Institution for gross sexual imposition and importuning, which are both third-degree felonies, along with a misdemeanor charge of disseminating matter harmful to juveniles. The man sent [nude photos of himself to a 13-year-old girl] through a free social networking application called Kik Messenger, according to Bobby Grizzard, detective with Massillon's Child Abuse Investigations Unit.

Massillon man sentenced for sending nude photos to teen, 7/9/14 Independent (Massillon, Ohio) A2, 2014 WLNR 18628255

In March, a 14-year-old Tampa girl got on a bus headed to Mexico with a 25-year-old sex offender she'd met through Kik, a smartphone messaging app. [...] Around the same time as the Tampa teen was heading to Mexico, a 15-year-old Hillsborough County girl was talking to a 23-year-old Tampa man using Kik, and sent him risque pictures. When she didn't want to send more explicit pictures, he threatened to show her parents the images she'd already given him, investigators say. In December, the friend of a 13-year-old Lake County high school student approached a school resource officer. She was concerned for her friend, who was communicating with a Ruskin man via Kik, authorities say. When investigators searched the man's home, they found a collection of child pornography. [...]

Right now, the Kik app is at the center of a lot of investigations. "The Kik app is one of the worst ones we've seen," Heaverin said. "It's a good app.

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... It was designed for a good reason. Predators have just figured out how to use it to their advantage." [...]

Christina Shatzen, a spokeswoman for Kik, said the safety and security of users are "extremely important" to the company, which "put a major emphasis on building features and resources for users and parents." <sup>6</sup>

Predators Target Kids Via Apps, Police Say, 8/17/14 Tampa Tribune. (Fla.), 2014 WLNR 22581252

During trial, prosecutors introduced several images of child pornography, including those depicting infants, which were obtained from Attaway's phone. The jury also heard and viewed evidence that Attaway was sexting with minor females through the phone application KIK. Attaway was also sending and receiving images of child pornography. An FBI agent informed the jury that child predators are known to frequent the KIK application to gain access to children.

Child molester sentenced to life, 4/27/15 Waxahachie Daily Light (Waxahachie, Tex.), 2015 WLNR 12322295

A Canton man has pleaded guilty to federal child pornography charges. Bradley D. Dawson, 27, [...] is set to be sentenced on Jan. 28 in U.S. District Court, according to a spokesman for the U.S. Attorney's office in Cleveland. Dawson pleaded guilty to charges of sexual exploitation of a minor, possession of child pornography and receipt or distribution of visual depictions of minors engaged in sexually explicit conduct. He told investigators that he portrayed himself as a female on a Kik Interactive social messaging website "because he found it easier to obtain child pornography while posing as a female," according court records filed in the case.

Canton man guilty of child porn charges, 10/22/15 Repository (Canton, Ohio) B4, 2015 WLNR 31520697

Charging documents say the defendant, Christopher David Schroeder, 41, met the girl, 15, online via the Kik messaging app in October or early November. The girl told him that she was unhappy, and Schroeder said he

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<sup>6</sup> In 2014, two years before Nicole Lovell's murder and five years before Jane Doe's abuse, Kik's spokeswoman, Christina Shatzen claimed that the safety and security of users are "extremely important" to the company, which "put a major emphasis on building features and resources for users and parents." Clearly, Kik either played lip service to public opinion or took abysmal steps to address the "safety and security of users."

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would help her, according to an affidavit filed in court by FBI Special Agent John Mark Burbridge. Schroeder picked her up in Ohio on Nov. 8 and drove her back to his lakefront home in the gated Lake Sherwood Estates community, Burbridge wrote. But first, he made her remove her phone's SIM card and battery, and destroyed the card, the agent wrote. When the two arrived at Schroeder's home, he had sex with her and told her she had to clean his house, the affidavit says. He also told her not to give her real name to anyone, and to change her appearance by cutting or coloring her hair, or both, Burbridge wrote. He had sex with her on multiple occasions, the affidavit says, even though he knew she was 15. She said that she wanted to go home, but Schroeder wouldn't allow it, and she was afraid to leave because Schroeder had "numerous" guns in his home, the agent wrote.

Warren County man accused of holding, raping 15-year-old girl he met online, 12/3/15 St. Louis Post-Dispatch A5 (MO), 2015 WLNR 35841874

Cases involving Kik in just the past couple of weeks include:

- A St. Louis man charged with using Kik to exchange child pornography.
- A western New York man charged with finding a 14-year-old girl through Kik and, posing as a teenager, sending her sexually explicit messages and trying to get her to meet him.
- An Alabama man charged with statutory rape and the attempted kidnapping of a 14-year-old girl he contacted on Kik.
- A Colorado man charged with taking a 13-year-old Connecticut girl to a hotel and sexually assaulting her, after chatting and arranging the meeting on Kik.

"The Kik app has become so popular. It's probably the one where law enforcement has seen the most activity," said Leslie Rutledge, the Arkansas attorney general, who issued a public plea last year to parents in her state to educate themselves about their children's online habits after two Arkansas men used Kik to solicit nude photos from under-age girls — and an undercover investigator.

Messaging app offers teenagers, and predators, anonymity, 2/8/16 International New York Times, 2016 WLNR 3821399

When a 15-year-old girl was caught sneaking back into her house around 6 a.m. Sunday, her parents called Murfreesboro police to investigate. According to the report filed by Detective Tommy Roberts, evidence indicated she had been at a South Church Street hotel.

Roberts then made contact with Bradley Difrischia, 29, of Jefferson Avenue in Sharon, Penn.

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Difrischia told officers he had met the girl through an online game called “Summons War” and began communicating through the Kik app, an online application that allows anonymous communication, the report stated.

The suspect made arrangements to come to Murfreesboro, Roberts said. The suspect picked up the teen and took her to the hotel, where they engaged in multiple sex acts, he added.

Difrischia was charged with four counts of statutory rape, but Roberts said the investigation is still underway and more charges may be forthcoming. Bond was set at \$400,000.

Kik and anonymous apps like it have been linked to a growing number of child sexual-abuse cases worked by the Rutherford County and Cannon County Child Protective Investigative Teams, according to a recent news release from the local Child Advocacy Center.

Police: Girl raped by PA man, 2/17/16 The Tennessean (Nashville, Tenn.) A12, 2016 WLNR 4935186

21. The above list is by no means exhaustive or complete record of all instances reported by the United States and foreign media over the last six years related to victimization of children using Kik, but it clearly shows that Kik Interactive knew or should have known that Kik is being used by the sex offenders all over the planet to victimize children going back as early as 2012. The list also shows Kik International’s failure not only to do anything about it, but also its failure to provide the most basic warning on its website to the parents or children. The level of Kik International’s disregard for consequences of creating predators’ paradise is simply astonishing.

22. It would be incredible to think that at the time of the Kik Messenger’s acquisition MediaLab did not know about Kik Messenger reputation as the sex offenders’ paradise. Yet, just like Kik Interactive, MediaLab did absolutely nothing about warning the parents or the underage users about dangers associated with children using Kik Messenger or instituting sufficient measures to fight this problem.

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23. Below are just a few press releases occurring after MediaLab's Kik Messenger acquisition proving that MediaLab was aware, should have been aware or willfully turned a blind eye to the sexual abuse of children issue:

Gary Edward Davis, 47, was identified as the owner of a username "Taboo\_Tendency," an account that was involved in Kik messenger chatrooms in January where images and videos depicting child pornography were being freely distributed between members, according to the documents. Davis' account distributed several video files that were seen by a sheriff's deputy posing as a group member while monitoring the group as part of an investigation in Winnebago County in Wisconsin, the court documents state.

Navy veteran, cybersecurity expert faces child porn charges in Monrovia, 3/17/20 The Frederick News-Post, 2020 WLNR 7812210.

John Angwin, [30] was sentenced to 132 months in prison, with 25 years post-release supervision, and payment to \$12,000 in restitution. He also will be required to register as a sex offender upon his release from prison, according to the DOJ. Angwin admitted in his guilty plea that he used his phone and the Kik Messenger app to possess and distribute child pornography, according to the DOJ.

Holland Patent man sentenced for child pornography, 2/11/20 Observer-Dispatch (Utica, N.Y.) A3, 2020 WLNR 4230943

Assistant U.S. Attorney John J. Field, who is handling the case, stated that on May 20, 2018, Clarke distributed child pornography using the KIK Messenger application on his smartphone. The defendant's phone was later seized and found to contain approximately 1580 images and 51 videos of child pornography, including images depicting sadistic conduct and the sexual abuse of infants and toddlers.

Fairport Man Pleads Guilty to Distributing Child Pornography, 2/10/20 U.S. Dep't Just. (DOJ) News, 2020 WLNR 4187639

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The cyber tip from the National Center for Missing and Exploited Children indicated that someone "uploaded a video of suspect child pornography utilizing a Gmail account" on Aug. 8, 2019, the affidavit stated.

The video depicted a pre-pubescent girl involved in a sex act, according to the court record. The Gmail account was registered to a "Steve Jobs" but after serving a subpoena to Verizon Wireless, a detective traced the account to DeBiase, the affidavit stated. Homeland Security investigators provided several more cyber tips about DeBiase's alleged child-pornography activity on the Kik messenger app, according to the record.

East Greenwich man, 31, charged in child porn case, 2/5/20 Courier-Post (Cherry Hill, N.J.) A2, 2020 WLNR 3542801

According to prosecutors, Williams admitted that he used the Kik Messenger application to distribute and receive child pornography from other Kik users from January 2016 through June 2016. Williams used his iPhone to trade images of child pornography via the internet. Execution of search warrants on Williams' desktop and laptop computers revealed that he possessed 4,875 images and 2,052 video files depicting minors engaged in sexually explicit conduct. The images and videos included depictions of the rape and sodomy of prepubescent children and toddlers.

City man admits to federal child porn charges, 9/25/19 Watertown Daily Times (N.Y.) A3, 2019 WLNR 29050291

24. MediaLab's acquisition of Kik Messenger happened barely 3 months after Jane Doe's sexual trafficking. It is very likely that negotiations between MediaLab and KIK INTERACTIVE and MediaLab's due diligence coincided with Jane Doe's abuse. MediaLab could not have not known about the notoriety of the very product it was acquiring. MediaLab has done nothing to implement policies sufficient to combat a known problem.

25. As of the date of filing of this Complaint, MediaLab, just like KIK INTERACTIVE in not so distant past, keeps marketing Kik Messenger to teenagers, stating that:

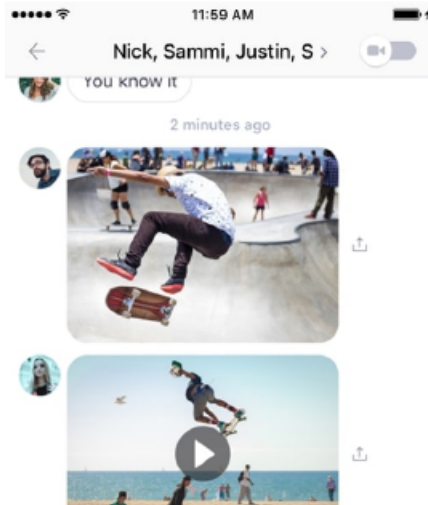


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## Connecting the world through chat.

Kik is one of the largest messaging apps in the world. Each day, Kik enables millions of people to chat with their friends and family, share photos, videos, gifs and more, and connect with new friends based on similar interests.

- ✓ 5th Most Engaging Social App In the United States
- ✓ 300,000,000 million registered users
- ✓ Used by 40% of US Teenagers



Source: <https://www.media-lab.ai/> (as of March 31, 2020)

26. MediaLab, just like KIK INTERACTIVE in not so distant past, keeps marketing Kik Messenger to teenagers that comprise 120,000,000 registered Kik Messenger users. That is tens of millions of sex trafficking and potential sex trafficking victims whom KIK INTERACTIVE and MediaLab failed and continue failing to warn and protect.

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**FACTUAL ALLEGATIONS**

Sometime in end of July 2019 Jane Doe's father's upon inspecting Jane's electronic devices, the father discovered that Jane downloaded Kik Messenger onto her tablet and cellphone. Further examination of Jane's tablet and cellphone revealed that from the beginning of July 2019 Jane became an active Kik Messenger user communicating with many grown man. Some of these men furnished the child with sexually explicit material, as well as asked her to send them, utilizing Kik Messenger, sexually explicit pictures and videos of herself. Upon reviewing the tablet the father identified at least 13 individuals (Identified Kik Users) who sexually exploited Jane Doe. The summary of what each of these Identified Kik User had done to Jane Doe is contained in the table below:

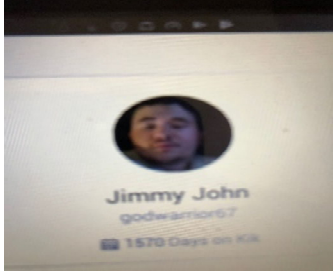
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Num	KIK Profile Name	Date of First Txt	Comments	Profile Picture
1	Bewidu	7/10/2019	<p>This individual directed the victim to send him pictures of the victim posing nude in various positions, made various lewd comments and suggestions to the victim and sent the victim numerous pictures depicting a nude adult black male or an adult black male's genitalia. The victim acting on his direction send him numerous pictures depicting her nude in sexually explicit poses including acts of masturbation. This individual provided the victim with his telephone number as an alternative method of communication</p>	 <p>This is not his profile picture. It is one of the selfies he sent to the victim.</p>

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			. The number is 864-504-4514.	
2	Robe Rodriguez	7/10/2019	25 years old male from Texas. This individual sent the victim numerous pictures depicting an adult white male's genitalia.	none

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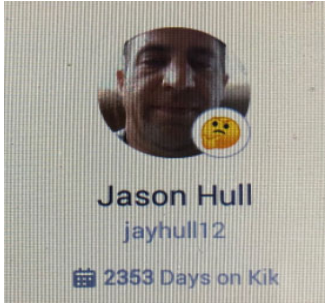
3	Jimmy John	7/9/2019	<p>20 years old male. This individual directed the victim to send him pictures of the victim posing nude in various positions, made various lewd comments and suggestions to the victim.</p>	
4	Sufian Ali	7/21/2019	<p>19 years old male. This individual directed the victim to send him pictures of the victim posing nude in various positions, made various lewd comments and suggestions to the victim. This individual sent the victim numerous pictures depicting an adult white male's genitalia.</p>	none

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5	s T	7/16/2019	<p>This individual directed the victim to send him pictures of the victim posing nude in various positions, made various lewd comments and suggestions to the victim and sent the victim numerous pictures depicting an adult white male's genitalia. The victim acting on his direction send him numerous pictures depicting her nude in sexually explicit poses including acts of masturbation.</p>	none
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6	Jason Hull	7/11/2019	<p>This individual made various lewd comments and suggestions to the victim and sent the victim a picture depicting, what appears to be, sperm. His age is not readily available, but judging from his profile picture, he is an adult white male.</p> <p>Furthermore, Hull told the victim that "I could eat you out in the movies." The act of offering the victim to take her to the movies constitutes federal sex trafficking under 18 U.S.C. §§1591, 1595 since Hull offers something of value for a sex act. Hull also mentioned communicating with a 12 years old girls and that his 14 years old cousin is sending nudes</p>	 A screenshot of a Kik profile for Jason Hull. The profile picture shows a man's face with a yellow smiley face sticker. Below the picture, the name "Jason Hull" is displayed in blue, followed by the username "jayhull12" in a smaller blue font. At the bottom, there is a blue icon of a calendar and the text "2353 Days on Kik".
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			<p>to a 34 years old and that she "likes it". It looks like that the beginning of Hull's conversation with the victim is missing. judging from the context of his exchanges with the victim, the victim sent him nude pictures and gave him her true age.</p>	
7	Vyn Greaves	7/12/2019	<p>This individual claims to be a 15 years old male from the Carrabin. He sounds significantly older. He directed the victim to send him pictures of the victim posing nude in various positions, made various lewd comments and suggestions to the victim and</p>	none

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			<p>sent the victim numerous pictures an adult black male's genitalia. The victim acting on his direction send him numerous pictures depicting her nude in sexually explicit poses. This individual suggested that the victim follows him on "ig" on "@kyng_vyn"</p>	
8	..zarurihaikya	7/12/2019	<p>This individual a 28 years old male. He directed the victim to send him pictures of the victim posing nude in various positions, made various lewd comments and suggestions to the victim and sent the victim numerous pictures an adult white male's genitalia. He got very angry with the victim when she refused to send</p>	none

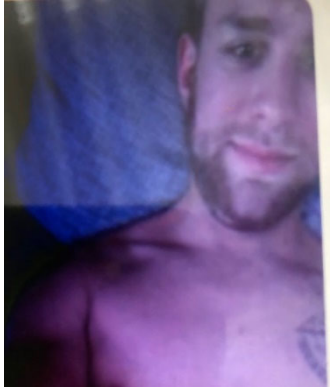
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			him nude pictures of herself.	
9	ares big	7/12/2019	This individual claims to be an 18 years old male from France. (I doubt he is French since he communicates in American English.) This individual sent the victim to numerous sexually explicit pictures of an adult white male genitalia. Some of the pictures depict anal sex involving foreign objects. He directed the victim to send him pictures of the victim posing nude in various positions, made various lewd comments and suggestions.	The victim none

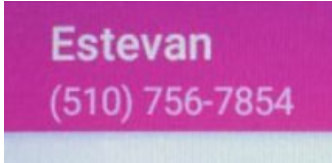
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			<p>acting on his direction send him numerous pictures depicting her nude in sexually explicit poses including acts of masturbation.</p>	
10	Nandan Sharma	7/12/2019	<p>This individual is a 24 years old male This individual sent the victim a picture of an adult black male genitalia. He directed the victim to send him pictures of the victim posing nude in various positions, made various lewd comments and suggestions. The victim acting on his direction send him numerous pictures depicting her nude in sexually explicit poses.</p>	none

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11	Niki Tor	7/11/2019	<p>This individual is a 20 years old male who claims to be from Austria. This individual sent the victim numerous pictures of an adult white male genitalia. He directed the victim to send him pictures of the victim posing nude in various positions, made various lewd comments and suggestions. The victim acting on his direction send him numerous pictures depicting her nude in sexually explicit poses including masturbation.</p>	 <p>This is not his profile picture. It is one of the selfies he sent to the victim.</p>
12	Connor B	7/11/2019	<p>This individual is a 23 years old male who claims to be from Ireland. This individual sent the victim a picture of an adult white male genitalia. He directed the victim to send him pictures of</p>	

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			the victim posing nude in various positions, made various lewd comments and suggestions.	
13	Estevan JKL	First or second week of July 2019	<p>This individual is a 21 years old male who may reside in San Francisco, CA. This individual sent the victim numerous pictures of an adult white male genitalia. He directed the victim to send him pictures of the victim posing nude in various positions, made various lewd comments and suggestions. The victim acting on his direction send him numerous pictures depicting her nude in sexually explicit poses including acts of masturbation. Moreover, there is credible</p>	 <p>None. Above is a screenshot of a text message from the victim's phone</p>

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			information that Estevan is maintaining similar Kik relationship with other underage girls from the victim's middle school and that the victim received Estevan's number from another underage girl in her school.	
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This table is just a tip of the iceberg and in no way fully describes the explicitness and the horror Jane Doe was subjected to while using Kik Messenger.

The sex trafficking and sexual abuse materials are presently stored on Jane Doe's tablet and a cellphone. On August 16, 2019, Jane Doe's father surrendered the tablet and the cellphone to the Florida Department of Law Enforcement's (FLDE) agent, Donald Cannon. There are also videos Jane sent to her abusers. At the time of filing of this action, the undersigned attorney does not have sufficient information regarding which of the IDENTIFIED KIK USERS received Jane's footage or which of the two electronic devices contain the videos.



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At the time of surrender, Agent Cannon provided the father with the FLDE receipt form for case number MT-75-0049. (Exhibit A). Since this material is highly illegal to possess and distribute, the examination of it, for the purposes of discovery, may be conducted on FLDE's premises and pursuant to Court's order.

**ALLOW STATES AND VICTIMS TO FIGHT ONLINE SEX TRAFFICKING ACT OF 2017 (FOSTA)**

27. On April 11, 2018 the Congress enacted ALLOW STATES AND VICTIMS TO FIGHT ONLINE SEX TRAFFICKING ACT OF 2017 “[t]o amend the Communications Act of 1934 to clarify that *section 230 of such Act does not prohibit the enforcement against providers and users of interactive computer services of Federal and State criminal and civil law relating to sexual exploitation of children or sex trafficking, and for other purposes.*” PL 115-164.

28. In the Section 2 of PL, the Congress stated that

It is the sense of Congress that—

(1) section 230 of the Communications Act of 1934 (47 U.S.C. 230; commonly known as the “Communications Decency Act of 1996”) was never intended to provide legal protection to websites that unlawfully promote and facilitate prostitution and websites that facilitate traffickers in advertising the sale of unlawful sex acts with sex trafficking victims;

(2) websites that promote and facilitate prostitution have been reckless in allowing the sale of sex trafficking victims and have done nothing to prevent the trafficking of children and victims of force, fraud, and coercion; and

(3) clarification of such section is warranted to ensure that such section does not provide such protection to such websites.

29. Pursuant to PL 115-164 section 5 was added to 47 U.S.C. §230 which states the following:

No effect on sex trafficking law

Nothing in this section (other than subsection (c)(2)(A)) shall be construed to impair or limit--

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(A) any claim in a civil action brought under section 1595 of Title 18, if the conduct underlying the claim constitutes a violation of section 1591 of that title;

(B) any charge in a criminal prosecution brought under State law if the conduct underlying the charge would constitute a violation of section 1591 of Title 18; or

(C) any charge in a criminal prosecution brought under State law if the conduct underlying the charge would constitute a violation of section 2421A of Title 18, and promotion or facilitation of prostitution is illegal in the jurisdiction where the defendant's promotion or facilitation of prostitution was targeted.

30. By enacting section 5 of 47 U.S.C. §230, the Congress has rescinded the near-categorical immunity interactive computer service providers and access software providers enjoyed against civil claims from sex trafficking victims.

31. 47 U.S.C. §230(f)(2) defines “interactive computer service” as “any information service, system, or access software provider that provides or enables computer access by multiple users to a computer server, including specifically a service or system that provides access to the Internet and such systems operated or services offered by libraries or educational institutions.” 47 U.S.C. §230(f)(4) defines “access software provider” as “a provider of software (including client or server software), or enabling tools that do any one or more of the following: (A) filter, screen, allow, or disallow content; (B) pick, choose, analyze, or digest content; or (C) transmit, receive, display, forward, cache, search, subset, organize, reorganize, or translate content.

32. KIK INTERACTIVE and MediaLab meet both the definition of an interactive computer service and an access software provider as they are “an information service . . . that provides or enables access to the internet . . .” and they are entities responsible for developing and/or providing the software that does any one or more of the following: “(A) filter, screen, allow, or disallow

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content; (B) pick, choose, analyze, or digest content; or (C) transmit, receive, display, forward, cache, search, subset, organize, reorganize, or translate content.”

**THE CONDUCT UNDERLYING THE CIVIL CLAIM UNDER FOSTA, 47 U.S.C. §230(5) AGAINST KIK INTERNATIONAL and MediaLab CONSTITUTES A VIOLATION OF SECTION 18 U.S.C. 1591(a)(1)**

**“Knowingly – in or affecting interstate or foreign commerce...”**

33. Some of IDENTIFIED KIK USERS, as fully described above, using channels of interstate commerce such as internet and Kik Messenger

**“recruits, entices...or solicits by any means a person...”**

34. recruited, enticed or solicited Jane Doe, by falsely promising her friendship, love, care, affection and benefits such as movie tickets

**“knowing...that means of force, threats of force, fraud, coercion...or any combination of such means will be used to cause the person to engage in a commercial sex act” (commercial sex act is defined as any sex act, on account of which anything of value is given to or received by any person)**

35. knowing that those fraudulent promises would cause Jane Doe to engage in a commercial sex acts.

36. Specifically, some of IDENTIFIED KIK USERS, using Kik, gained Jane Doe’s trust by representing themselves as her friends and people that care about her, enticed her by fraudulent promises of love and affection into performing commercial sex acts including, but not limited to, masturbation <sup>7</sup> as documented in Kik videos and pictures that Jane Doe sent to some of

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<sup>7</sup> United States v. Tollefson, 367 F. Supp. 3d 865, 878–80 (E.D. Wis. 2019) (The Court found that Minor victim's act of masturbation, as documented in online video and photos that victim sent to defendant, qualified as “commercial sex act,” within the meaning of statute criminalizing the sex trafficking of children by force, fraud, or coercion. 18 U.S.C. § 1591(e)(3) and “The Court [found] that the ordinary meaning of sex act does not require physical contact; it includes masturbation.”)

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IDENTIFIED KIK USERS or made plans for Jane Doe to engage in future commercial sex acts.<sup>8</sup>

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37. In the course of causing Jane Doe participation in commercial sex acts, IDENTIFIED KIK USERS received things of value, such as sexual acts performed by Jane Doe at their direction, videos, and photographs.<sup>10</sup>

38. Instead, IDENTIFIED KIK USERS used this ploy as fraudulent means of obtaining sexual gratification and to sexually traffic Jane Doe.

39. In sum, IDENTIFIED KIK USERS utilizing channels of interstate commerce and a fraudulent ploy, knowingly recruited or enticed Jane Doe into performing commercial sexual acts or made plans for Jane Doe to engage in future commercial sex acts.

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<sup>8</sup> United States v. Wearing, 865 F.3d 553, 556 (7th Cir.), cert. denied, 138 S. Ct. 522, 199 L. Ed. 2d 400 (2017) (“The more logical reading of [18 U.S.C. §1591’s] phrase “knowing ... the person ... will be caused to engage in a commercial sex act” is that it describes the acts that the defendant intends to take—that is, that he means to “cause” the minor to engage in commercial sex acts. That is the interpretation other circuits have adopted; they have concluded that the statute uses the future tense to describe the defendant’s plan for the victim at the time he recruits her. *See, e.g., United States v. Mozie*, 752 F.3d 1271, 1286 (11th Cir. 2014) (accepting evidence that defendant recruited victims “to engage in commercial sex acts,” even though those acts never materialized, as sufficient to support a section 1591 conviction).”)

<sup>9</sup> “The term “commercial sex act” means any sex act on account of which anything of value is given to or received by any person.” 22 U.S.C. § 7102(4)

<sup>10</sup> United States v. Cook, 782 F.3d 983, 989–90 (8th Cir. 2015) (“A person of ordinary intelligence would reasonably understand that sexual acts, photographs, and videos—which are items that many people spend significant time, money, and effort pursuing and acquiring—could constitute “things of value.” A person of ordinary intelligence would also reasonably understand that acquiring those items through participation in a commercial sex trafficking venture could result in criminal culpability. Section 1591(a)(2) gave Cook fair notice that he could be held liable for receiving “things of value,” i.e., sexual acts, videos, and photographs, through participation in a commercial sex trafficking venture.”)

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**Count I**

**Civil recovery under 18 U.S.C. § 1595(a) against Kik International and MediaLab for participating in a venture<sup>11 12</sup> in violation of 18 U.S.C. §1591(a)(2) by benefiting, financially or by receiving anything of value from acts described in paragraph 18 U.S.C. § 1591(a)(1)**

40. Plaintiff incorporates by reference all other paragraphs of this complaint as if fully set forth herein, and further alleges as follows:

41. 18 U.S.C. § 1595(a) provides the following: An individual who is a victim of a violation of this chapter may bring a civil action against the perpetrator (or whoever knowingly benefits, financially or by receiving anything of value from participation in a venture which that person knew or should have known has engaged in an act in violation of this chapter) in an appropriate district court of the United States and may recover damages and reasonable attorneys fees.

**Conduct in violation of 18 U.S.C. §1591(a)(2)**

42. KIK INTERNATIONAL and MediaLab as its successor in interest, knowingly<sup>13</sup> participated in IDENTIFIED KIK USERS' venture in violation of 18 U.S.C. §1591 by benefiting from, and knowingly facilitating (by not implement policies sufficient to combat a known problem), the venture in which IDENTIFIED KIK USERS used Kik Messenger in the interstate commerce to subject Jane Doe to sex trafficking.

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<sup>11</sup> "The term "participation in a venture" means knowingly assisting, supporting, or facilitating a violation of subsection (a)(1)." 18 U.S.C. § 1591(4)

<sup>12</sup> "The term "venture" means any group of two or more individuals associated in fact, whether or not a legal entity." 18 U.S.C. § 1591(6)

<sup>13</sup> H.H. v. G6 Hosp., LLC, No. 2:19-CV-755, 2019 WL 6682152, at \*2-3 (S.D. Ohio Dec. 6, 2019) "[T]here is no actual knowledge requirement in § 1595 with respect to the sex trafficking venture. [The Court found that]...Plaintiff's allegations are sufficient to allege constructive knowledge [in a civil sex trafficking action] [as] several courts have found failure to implement policies sufficient to combat a known problem in one's operations can rise to the level of willful blindness or negligence."

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43. KIK INTERNATIONAL and MediaLab as its successor in interest knew, or were in reckless disregard of the facts, that it was the practice of IDENTIFIED KIK USERS to utilize Kik Messenger to furnish harmful materials such as pictures of men's genitalia to Jane Doe and subject Jane Doe to sex trafficking.

44. KIK INTERNATIONAL and MediaLab as its successor in interest had knowledge of multiple instances in which such acts were alleged against other adult Kik Messenger users, prior to July 2019.

45. Despite such knowledge, KIK INTERNATIONAL and MediaLab as its successor in interest continued to market Kik Messenger to underage users without a sufficient warning and implementation of sufficient polices to protect the underage users of Kik Messenger.

46. KIK INTERNATIONAL and MediaLab as its successor in interest, benefitted from the venture from such a venture. Due to KIK INTERNATIONAL's and/or MediaLab's failure to adequately warn the parents and institute substantive measure to curtail child abuse and manufacturing and distribution of obscene materials (including child pornography), between 2015 and March 31, 2020, Kik Messenger's subscribers' base reached approximately 300 million users.<sup>14</sup> Upon information and belief, as July 2019 Kik Messenger membership was still hundreds of millions of subscribers. Such an enormous subscribers base translates into benefits for KIK INTERNATIONAL in the form of selling third parties' apps, advertising revenues, selling of emojis, smileys and digital stickers, attracting outside investments and expanding the KIK brand

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<sup>14</sup> Kik, U.S. government both request quick judgment in cryptocurrency case, 3/26/20 Kitchener-Waterloo Record, 2020 WLNR 8850522 ("By September 2017, Kik had more than 300 million registered clients and about 15 million monthly users. It had also garnered significant interest from investors - including a \$50 million investment from Chinese firm Tencent in 2015 that put Kik's valuation at \$1 billion.")

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and Kik Messenger. Moreover, through its membership and anonymity, Kik Messenger became a valuable asset with a great money making potential which was sold by KIK INTERACTIVE to MediaLab to each other's benefit.

47. Furthermore, relying at least partially at Kik Messenger subscribers' base, KIK INTERNATIONAL and/or MediaLab launched a Minimum Viable Product ("MVP") that integrated Kin <sup>15</sup> within Kik Messenger. The MVP allowed users to use Kin to access tiered premium content, such as sticker packs, that were unlocked depending on the amount of Kin owned. Upon information and belief, KIK INTERNATIONAL believes that stickers are quite possibly a billion dollar industry. Upon information and belief, KIK INTERNATIONAL and/or MediaLab amie(s) to achieve financial result similar to a messaging company, Line which earned over \$250 million in a year, solely from digital stickers. Upon information and belief, KIK INTERNATIONAL believes that roughly 20 percent of the thousands of TDE (token distribution event) purchasers linked their wallets to their Kik accounts, and participants applauded KIK INTERNATIONAL for implementing Kin into Kik online.

48. The Plaintiff has suffered injuries, and other damages, as a result of being trafficked by IDENTIFIED KIK USERS utilizing Kik Messenger.

WHEREFORE, Plaintiff requests judgment for compensatory damages, reasonable attorneys' fees and punitive damages against Defendants KIK INTERACTIVE INC and MediaLab

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<sup>15</sup> Kin is [a cryptocurrency] that will be integrated into Kik as the primary transaction currency. By integrating Kin into Kik's chat platform, which has millions of users, to drive mainstream consumer adoption, Kin has the potential to become the most adopted and used cryptocurrency in the world. Eventually, the Kin Rewards Engine, an innovative cryptoeconomic structure intended to promote the use of Kin as a common currency, administered by the Kin Foundation, will foster the creation and development of a worldwide, decentralized ecosystem of digital services. (<https://www.prnewswire.com/news-releases/kik-raises-nearly-us100-million-in-kin-token-distribution-event-300525870.html>)

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as its successor in interest, pursuant to 18 U.S.C. §1595 and applicable law, and such other and further relief as is just and proper.

**PRAYER FOR RELIEF**

WHEREFORE, the putative representative Plaintiff prays for judgment against the Defendants as follows:

- A. For an award of compensatory damages in the amount to be determined for all injuries and damages described herein;
- B. For an award of punitive damages to the extent allowable by law, in an amount to be proven at trial;
- C. Awarding declaratory and injunctive relief as permitted by law or equity, including: enjoining Defendants from continuing the unlawful practices as set forth herein;
- D. Ordering Defendants to engage in a corrective advertising campaign;
- E. Awarding restitution and disgorgement of Defendants' revenues to the Plaintiff;
- F. Awarding attorney fees and costs; and
- G. Providing such other relief as may be just and proper.



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**JURY DEMAND**

Jane Doe hereby requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

Dated: April 5, 2020

Respectfully submitted,

THE LAW OFFICES OF BRUCE PROBER,  
P.A.

Attorney for the Plaintiff, Jane Doe

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By: /s/ Bruce Prober

Bruce Prober, Esq.

FBN: 895881



# RECEIPT FORM

Florida Department of Law Enforcement

CASE NUMBER <b>MT-75-0449</b>	DATE <b>8-19-2019</b>
RELEASED BY (PRINT/TYPE NAME & TITLE)	
RECEIVED BY (PRINT/TYPE NAME & TITLE) <b>D.P. Cannon, SA</b>	
PURPOSE/REMARKS <b>Forensic Review</b>	
I hereby acknowledge receipt of the following described property which was given into my custody by the above named individual for the noted purpose.	
Amount/Quantity	Description
1	RCA Tablet Pink case w/Blk card
1	'AN 5' Phone Silver
RELEASED BY (SIGNATURE) 	RECEIVED BY (SIGNATURE) 
WITNESSED BY (OPTIONAL)	WITNESSED BY (OPTIONAL)

## FLORIDA DEPARTMENT OF LAW ENFORCEMENT



**DONALD CANNON**  
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Cyber/High Tech Crime Squad

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