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**California State Assembly**  
**PRIVACY AND CONSUMER PROTECTION**



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INFORMATIONAL HEARING  
ASSEMBLY PRIVACY AND CONSUMER PROTECTION COMMITTEE

**TECHNOLOGY-FACILITATED MALE VIOLENCE AGAINST WOMEN AND GIRLS**

Tuesday, February 25, 2025  
1:30 p.m.  
State Capitol Room 444

**BACKGROUND PAPER**

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**Caution:** *The subject of this hearing and the contents of the background paper contain discussions of extreme violence, sexual assault, and virulent hatred toward women and girls. In order to illustrate the seriousness and urgency of the situation, some examples included in this background paper contain offensive language and graphic descriptions of harm. This topic is not suitable for everyone and may be upsetting or traumatizing. The Chair asks readers and attendees to take care when engaging with these important but often very disturbing issues.*

**I. INTRODUCTION**

One of the defining aspects of the first quarter of the century is the dramatic shift from physical, analog life to lives that are lived more and more online and in virtual spaces. No longer do people reach for the phone attached to the wall to make a call or walk down the hall when they need to communicate with someone; now the likeliest instinct is to reach for a handheld computer and text someone. Boundaries between private lives and public lives have eroded, people can find answers to questions in a matter of seconds, and those who have often been ignored and silenced can find a global voice, allowing them to band together to move governments and public opinion. The changes have been nothing short of revolutionary.

However, as with most revolutionary advances, great harm can accompany the positive changes. This hearing will examine the way advances in technology and the existence of online spaces have created

new weapons that are being used by men to attack women and girls.<sup>1</sup> Women and girls have always had to find ways to navigate a world where men can prove to be a threat to their safety and wellbeing. Social media, gaming sites, and other virtual spaces often facilitate new forms of misogynistic abuse – cyberstalking, doxing, revenge porn, AI-generated sexual abuse, and virtual sexual assault – enabling men to attack, intimidate, and silence women with greater efficiency. Shielded by the sweeping immunity granted by Section 230 of the federal Communications Decency Act, these platforms have license to ignore harms, frequently leaving victims without recourse against anonymous attackers.

In addition, the hearing will examine the problems facing boys and young men, and how this leads them to problematic online experiences, such as violent pornography, AI girlfriends, and the “manosphere” – a sprawling network of online communities that promote misogyny. This paper describes the subcultures that comprise the manosphere and examines how they draw in disaffected boys and young men with messages of self-improvement that eventually give way to extreme content, channeling personal frustration into vitriolic rage against women.

The paper concludes with a discussion of two paths forward, one cultural and the other legal – the importance of an expanded conception of masculinity and the need for Section 230 reform.

## II. SECTION 230: PROTECTING THE PLATFORMS THAT HOST ONLINE PERPETRATORS

Section 230 of the federal Communications Decency Act of 1996 (CDA), which creates a liability shield for online platforms from harms arising from third-party content, has been hailed as the law that created the modern internet, fostering free expression online and allowing an array of innovative services and spaces to flourish, from search engines to social media.<sup>2</sup> It has also come with a destructive side, absolving platforms of responsibility for virtually all third-party abuse facilitated by their services—“a protection not available to print material or television broadcasts.”<sup>3</sup> As University of Virginia School of Law Professor Danielle Keats Citron writes:

A brick-and-mortar business that makes it easy for third parties to stalk and invade the privacy of victims faces tort liability for enabling the abuse. A hard-copy magazine that published user-submitted nonconsensual porn encounters a blizzard of privacy lawsuits. But when those activities happen online, companies are shielded from liability. We have Section 230 to thank for that.<sup>4</sup>

Such harms, Professor Citron argues, are disproportionately visited upon women, children, and minorities, depriving them of the opportunity to participate fully in online life at the expense of their civil rights and liberties. This section addresses the purpose and text of Section 230 and key judicial precedents that interpreted it broadly.

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<sup>1</sup> Common criticisms of this topic are accusations of portraying all or the majority of men as perpetrators (“not all men”) and ignoring the fact that women commit gender violence as well and that men are victims of these types of abuses, too. Although this is true, the data shows that women are overwhelmingly the victims of sexual violence and men are overwhelmingly the perpetrators of sexual violence. Therefore, throughout this paper, the discussion of gendered violence will be framed as the violence that men perpetrate against women.

<sup>2</sup> See e.g., Kosseff, *The Twenty-Six Words that Created the Internet* (2019); Jeffrey D. Neuburger, “United States: Commerce Dept. Petitions FCC to Issue Rules Clarifying CDA Section 230,” (Aug. 7, 2020) *Mondaq*, <https://www.mondaq.com/unitedstates/social-media/971694/commerce-dept-petitions-fcc-to-issue-rules-clarifying-cda-section-230> [https://perma.cc/JQ85-2FYE]; Danielle Keats Citron, “How to Fix Section 230” (2023) 103 B.U.L. Rev. 713, 717 (hereafter “How to Fix Section 230”).

<sup>3</sup> Quinta Jurecic, “The politics of Section 230 reform: Learning from FOSTA’s mistakes” (Mar. 1, 2022) *Brookings*, <https://www.brookings.edu/articles/the-politics-of-section-230-reform-learning-from-fostas-mistakes/>; Michael Rustad & Thomas Koenig, “The Case for a CDA Section 230 Notice-and-Takedown Duty” (2023) 23 Nev.L.J. 533, 536.

<sup>4</sup> *The Fight for Privacy: Protecting Dignity, Identity, and Love in the Digital Age* (2022), p. 84.

***Congress’s intent: encourage Good Samaritans to self-regulate.*** Section 230’s initial purpose was to encourage online companies to engage in good-faith moderation of offensive content. It was prompted by *Stratton Oakmont v. Prodigy Servs. Co.*,<sup>5</sup> a New York State trial court case in which Stratton Oakmont – of *Wolf of Wall Street* infamy – sued Prodigy, a social network, for allegedly defamatory statements posted on Prodigy’s bulletin board by a user. At issue was the proper analogy to brick-and-mortar counterparts under longstanding defamation law. Publishers, such as book or newspaper publishers, are strictly liable for publishing defamatory content. By contrast, distributors, such as book stores, libraries, or newsstands, do not face such liability unless they know or have reason to know of the defamation.<sup>6</sup> The court concluded that Prodigy was subject to publisher liability because it functioned like a newspaper by advertising and implementing a practice of controlling content posted on its site. The court contrasted Prodigy’s active content moderation with a case that found that CompuServe, which did not screen posts on its site, operated more like a newsstand and thus was subject to the more lenient distributor liability standard.<sup>7</sup>

Recognizing that the logic of this ruling could create a perverse incentive for sites to altogether eschew content moderation,<sup>8</sup> Congress amended section 230 into the CDA, a broader effort to restrict minors’ access to online pornography that, except for Section 230, was ultimately invalidated for violating the First Amendment.<sup>9</sup> The sponsors of Section 230, then-Representatives Ron Wyden (D-Ore) and Chris Cox (R-Calif.), were optimistic that the internet could largely self-regulate without government interference. According to Cox, their aim was to “protect[] speech and privacy on the internet from government regulation, and incentiviz[e] blocking and filtering technologies that individuals could use to become their own censors in their own households.”<sup>10</sup>

The crux of Section 230 is contained in subdivision (c), which is entitled “Protection for ‘Good Samaritan’ blocking and screening of offensive material.” First, subdivision (c)(1) addresses the *Stratton Oakmont* holding by specifically shielding platforms from publisher liability: “No provider or user of an interactive computer service shall be treated as the *publisher* or speaker of any information provided by another information content provider.”<sup>11</sup> Second, to encourage content moderation, subdivision (c)(2) provides a safe harbor for “any action voluntarily taken in good faith to restrict access to or availability of material that the provider or user considers to be obscene, lewd, lascivious, filthy, excessively violent, harassing, or otherwise objectionable, whether or not such material is constitutionally protected.” Section 230 also preempts enforcement of contrary state laws<sup>12</sup> and enumerates exemptions for enforcement of federal criminal statutes, intellectual property laws,<sup>13</sup> communications privacy laws, and knowing facilitation of sex trafficking.<sup>14</sup>

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<sup>5</sup> (Sup.Ct. May 24, 1995, INDEX No. 31063/94) 1995 N.Y. Misc. LEXIS 229 (unpublished).

<sup>6</sup> *Cubby, Inc. v. CompuServe, Inc.* (S.D.N.Y. 1991) 776 F.Supp. 135, 139; *Cianci v. New Times Publishing Co.* (2d Cir. 1980) 639 F.2d 54, 61 (Friendly, J.) (quoting Restatement (Second) of Torts § 578 (1977)).

<sup>7</sup> *Stratton Oakmont v. Prodigy Servs. Co.*, *supra*, 1995 N.Y. Misc. LEXIS 229, at \*10, discussing *Cubby, Inc. v. CompuServe, Inc.*, *supra*, 776 F.Supp. at p. 140.

<sup>8</sup> *Fair Hous. Council v. Roommates.com, LLC* (9th Cir. 2008) 521 F.3d 1157, 1163, discussing *Stratton Oakmont*, *supra*, 1995 N.Y. Misc. LEXIS 229.

<sup>9</sup> *Reno v. ACLU* (1997) 521 U.S. 844, 874.

<sup>10</sup> *Richmond Journal of Law and Technology* (2020) <https://jolt.richmond.edu/2020/08/27/the-origins-and-original-intent-of-section-230-of-the-communications-decency-act/>.

<sup>11</sup> Emphasis added. The term “interactive computer service” means 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. (42 U.S.C. § 230(f)(3).)

<sup>12</sup> § 230(e)(3).

<sup>13</sup> The Ninth Circuit has construed this exception as applying only to federal intellectual property laws.

<sup>14</sup> § 230(e).

**Courts' interpretation: blanket protections for Bad Samaritans.** A key early ruling, *Zeran v. Am. Online, Inc.*,<sup>15</sup> held that AOL was not liable for failing to remove anonymous posts claiming that Oklahoma businessman Kenneth Zeran was selling merchandise with offensive slogans celebrating the 1995 Oklahoma City bombing. Inundated with threatening calls and unable to identify the anonymous poster, Zeran sued AOL, claiming that it was liable as a distributor for failing to timely remove the posts after he had repeatedly reported them. The court rejected this argument. Because removing content was a “traditional editorial function” – such as deciding whether to publish, withdraw, postpone or alter content – the court concluded that distributor liability in this context was a “species of publisher liability” that “could produce an impossible burden for service providers, who would be faced with ceaseless choices of suppressing controversial speech or sustaining prohibitive liability.”<sup>16</sup> Thus, the court collapsed the common law distinction between publishers and distributors, even though Section 230(c)(1) expressly applies only to the former. As a result, Zeran, like many victims of online harassment, was left without recourse for activities that, in the offline world, would result in a distributor’s liability.

This seminal ruling “set[] the template for all future courts.”<sup>17</sup> Following its logic, courts have extended Section 230 immunity well beyond the defamation context, consistently concluding that online intermediaries are not liable for harms – including egregious abuses of children, women, and people in historically excluded and underrepresented communities – originating from third-party content. “The common thread weaving through these cases is that the courts have sapped §230’s Good Samaritan concept of its meaning.”<sup>18</sup> For example, Section 230 has been held to bar claims against a website’s knowing use of nonconsensual images in advertisements for adult services,<sup>19</sup> a website administrator’s decision to add derogatory commentary to a post claiming a woman slept with an entire football team,<sup>20</sup> and an internet service provider’s hosting of “revenge porn” websites.<sup>21</sup>

Section 230 has also been held to bar claims for negligence – the most common type of tort lawsuit in the brick-and-mortar world – against platforms for failing to take minimal precautions to protect their users against foreseeable harms by third parties. This has been especially consequential for large social media companies, which did not exist when Section 230 was enacted but today have billions of users and are among the most profitable companies in the world. For example, Section 230 protected a social media platform that made it easy for children to create adult profiles, leading to the sexual assault of a 13-year-old girl by an adult male.<sup>22</sup> Similarly, a dating website had no obligation to even attempt to prevent users from being exposed to serial predators who repeatedly used the site as a hunting ground.<sup>23</sup> Another dating website had no duty to respond to repeated pleas from a victim depicted in a fictitious account with revenge porn, causing the victim to receive over 1,400 unwanted solicitations over 10 months, including at his home and workplace.<sup>24</sup> The victim’s lawyer, Carrie Goldberg, later stated that Section 230 is “the single greatest enabler of every asshole, troll, psycho, and perv on the internet.”<sup>25</sup>

### III. ONLINE SEXUAL ABUSE

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<sup>15</sup> (4th Cir. 1997) 129 F.3d 327.

<sup>16</sup> *Id.* at p. 333.

<sup>17</sup> Eric Goldman, “The Ten Most Important Section 230 Rulings” (2017) 20 Tul. J. Tech. & Intell. Prop. 1, 3

<sup>18</sup> “How to Fix Section 230,” p. 727.

<sup>19</sup> *Ramey v. Darkside Prods.* (D.D.C. May 17, 2004, Civil Action No. 02-730 (GK)) 2004 U.S. Dist. LEXIS 10107, at \*1.

<sup>20</sup> *Jones v. Dirty World Entertainment Recordings LLC* (6th Cir. 2014) 755 F.3d 398, 401, 403.

<sup>21</sup> *GoDaddy.com, LLC v. Troups* (Tex. Ct. App. 2014) 429 S.W.3d 752.

<sup>22</sup> *Doe v. MySpace Inc.* (5th Cir. 2008) 528 F.3d 413.

<sup>23</sup> *Beckman v. Match.com* (May 29, 2013) D.Nev., No. 2:13-CV-97 JCM (NJK) 2013 U.S. Dist. LEXIS 78339, at \*13.

<sup>24</sup> *Herrick v. Grindr* (S.D.N.Y. 2018) 306 F. Supp. 3d 579; “How to Fix Section 230” at p. 725.

<sup>25</sup> Jessica Testa, “Revenge Porn Lawyer Carrie Goldberg Has Taken On Psychos, Stalkers, and Trolls. Now She Confronts Her Own Worst Demons” (Jul. 17, 2019) *Elle*, <https://www.elle.com/culture/books/a28401678/carrie-goldberg-nobodys-victim-interview/>.

Just as women and girls have long had to deal with unwanted attention from men out in public as part of their everyday lives, including whistling, cat calls, unwelcome comments, groping, and aggressive sexual advances, now they must deal with the fact that they will be attacked online as well. Such attacks include cyberstalking; doxing; death and rape threats; and the non-consensual sharing or threatened distribution of intimate images, including deepfake ‘pornography’ created or altered by generative AI.<sup>26</sup>

In 2023, Open University surveyed 7,500 adults across the UK in the largest study to date on the experience of women online when it comes to cyber-violence. In the survey, over one in 10 women reported that they had experienced online violence and three in 10 had witnessed it. Even more significantly, those figures amongst young women age 16 to 25 increase to 25%, and for LGBTQ women, to 35%. Over one in eight women who experienced online violence said it had progressed to offline violence.<sup>27</sup>

In a global survey in 2020, with a smaller sample size, The Economist Intelligence Unit reported that more than half of the survey respondents who had experienced online violence knew the perpetrator. In addition, 74% expressed concern about online abuse escalating to offline violence. Online violence against women discourages their online engagement. Nearly nine out of 10 women report restricting their online activity, which limits the access to employment, education, healthcare, and community.<sup>28</sup>

***Rape and sexual violence focused chat rooms.*** One of the earliest ways that men have used the internet to perpetrate sexual assault on women and girls is through online message boards and chatrooms. Beginning in the 1990s, as the internet became more widely accessible, online message boards, chatrooms, and forums provided new ways for people to communicate. Platforms such as AOL chat rooms, IRC (Internet Relay Chat), and early forums like 4chan and Reddit’s predecessors allowed anonymous or pseudonymous interaction. While these spaces fostered community-building, they also became breeding grounds for predatory behavior. Men could manipulate young women and girls under the guise of anonymity, engaging in grooming, harassment, and exploitation.

During the first decade of the 21st century came the growth of imageboards (such as 4chan, 8chan, and later Kiwi Farms) that allow users to post images along with text and chat, online spaces became more unregulated, allowing misogynistic subcultures to thrive. Some of these communities engaged in targeted harassment campaigns against women, often doxing victims (publishing their private information) and encouraging sexual violence. The rise of social media also enabled coordinated abuse, with platforms like Reddit, Twitter, and Discord hosting private groups dedicated to sharing non-consensual images and organizing sexual exploitation.

Over the last 15 years, encrypted messaging services such as Telegram, Signal, and WhatsApp, as well as dark web forums, provided predators with even greater anonymity. These platforms have been used for human trafficking, revenge pornography, and other forms of sexual exploitation. Law enforcement agencies have struggled to monitor and regulate these spaces due to the privacy protections built into these services. The experience of Giselle Pelicot<sup>29</sup> serves as an example of a disturbing culmination of these trends.

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<sup>26</sup> Kate Gibbons, “Women now ‘expect to be abused online,’” *The Times of London* (Feb. 28, 2024) accessed at <https://www.thetimes.com/uk/article/women-now-expect-to-be-abused-online-76ggg6wht?region=global>

<sup>27</sup> Katy Shelton, *OU research reveals shocking level of online violence experienced by women and girls across the UK*, The Open University, accessed at <https://research.open.ac.uk/news/ou-research-reveals-shocking-level-online-violence-experienced-women-and-girls-across-uk>.

<sup>28</sup> “Measuring the prevalence of online violence against women,” *The Economist* (Mar. 1, 2021) accessed at <https://onlineviolencewomen.eiu.com/>

<sup>29</sup> Giselle Pelicot, upon discovering what her husband had done to her for a decade, waived her right to anonymity in order for the trial to be held in public. *The Guardian* has covered Giselle Pelicot and the trial of her husband and his fellow rapists in detail. More information about Giselle, the trial, and her global impact can be found on its website.

*The website Coco.fr and Dominique Pelicot, one of history's worst sexual predators.* For a decade, Dominique Pelicot (71) drugged his wife of 50 years, Giselle Pelicot (72), with sleeping pills and anti-anxiety medication and then invited men into their home to rape her while he filmed them. The Pelicots lived in a small village in Provence, France with a population of approximately 1,200 people. During the investigation, local police found hundreds of videos of Giselle being raped by different men. In the videos Pelicot would tell men “to help themselves” and he would make obscene comments about his wife “the slut” off camera, while the men raping her occasionally did a thumbs up or victory sign to the camera. The videos also showed that he often “propped notes beside her that read: ‘Service slut’ and ‘Whore,’ or wrote on her body: ‘I’m a submissive slut.’”<sup>30</sup> In addition the local police found semi-nude pictures of his sleeping adult daughter wearing underwear she did not recognize, and he also hid cameras in the bathrooms and bedrooms of his sons’ homes so he could videotape and photograph their wives and share nude pictures of them online.<sup>31</sup> All told, the police found over 20,000 images and videos of Giselle Pelicot being raped over 100 times on her husband’s computer.<sup>32</sup>

According to reports, Dominique Pelicot solicited men on a forum called “à son insu” (without her knowledge) on the French website Coco.fr. The videos found by the police showed approximately 70 different men raping Giselle, 50 of whom they were able to identify using facial recognition technology. Most of the men came from within 40 miles of the village. The 50 men, who have since been convicted, ranged in ages from 26 to 74 and included a nurse, soldier, electrician, journalist, prison warden, butcher, farm workers, and delivery drivers.<sup>33</sup>

In January 2025, the French police arrested Isaac Steidl, the founder of the website Coco.fr, which was shut down in June 2024. French prosecutors have connected Coco.fr to more than 23,000 criminal cases including rape, murder and pedophilia. The owner of the website “faces up to 10 years in prison and a fine of 500,000 euros if found guilty of providing ‘an online platform to enable illicit transactions.’”<sup>34</sup>

As the owner Coco.fr, Steidl had been protected from liability for the damage caused by the anonymous online platform. Similar to Section 230 in the United States, for years European Union regulations had broad provisions that prevented a website owner from being held legally liable for the content posted on their site. Fortunately, a 2023 change in French law provided an opening to hold the website owner responsible.<sup>35</sup>

Giselle Pelicot’s decade-long sexual abuse and the role that Coco.fr played in her husband’s ability to carry out those crimes underscore how digital spaces have enabled and escalated sexual violence, raising urgent concerns about online accountability, law enforcement intervention, and the need for policy reforms to combat technology facilitated abuse.

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<sup>30</sup>Angelique Chrisafis, “Woman tells trial of husband who invited men to rape her: ‘I was sacrificed on altar of vice’” *The Guardian* (Sep. 5, 2024) accessed at <https://www.theguardian.com/world/article/2024/sep/05/french-woman-world-fell-apart-alleged-rapes-men-invited-by-husband-gisele-pelicot>

<sup>31</sup> Angelique Chrisafis, “‘A rapist can be in the family’: how Dominique Pelicot became one of the worst sexual predators in history,” *The Guardian* (Dec. 11, 2024) accessed at <https://www.theguardian.com/world/2024/dec/11/a-rapist-can-be-in-the-family-how-dominique-pelicot-became-one-of-the-worst-sexual-predators-in-history>

<sup>32</sup> Angelique Chrisafis, “Woman tells trial of husband who invited men to rape her: ‘I was sacrificed on altar of vice’” *The Guardian* (Sep. 5, 2024) accessed at <https://www.theguardian.com/world/article/2024/sep/05/french-woman-world-fell-apart-alleged-rapes-men-invited-by-husband-gisele-pelicot>

<sup>33</sup> Angelique Chrisafis, “Gisèle Pelicot rape trial: ex-husband jailed for 20 years as all 51 men found guilty,” *The Guardian* (Dec. 19, 2024) accessed at <https://www.theguardian.com/world/2024/dec/19/gisele-pelicot-trial-husband-jailed-for-20-years-as-all-51-men-found-guilty>

<sup>34</sup> Anthony Cuthbertson, “Founder of website used by Gisèle Pelicot’s ex-husband charged.” *Independent* (Jan. 9, 2025) accessed at <https://www.the-independent.com/tech/gisele-pelicot-website-coco-dominique-b2676445.html>

<sup>35</sup> Nick Robins-Early, “The anonymous, anything-goes forum at the heart of the Pelicot rape case,” *The Guardian* (Oct. 12, 2024) accessed at <https://www.theguardian.com/world/2024/oct/12/coco-website-pelicot-rape-trial>

**Nonconsensual pornography.** Before the internet, the unauthorized distribution of intimate images and videos was limited to physical media, such as printed photographs, home videos, and VHS tapes. While explicit content was occasionally leaked or stolen, the lack of a widespread digital infrastructure meant that distribution was relatively slow and contained.

One of the earliest high-profile cases of nonconsensual pornography involved Pamela Anderson and Tommy Lee who had a private sex tape stolen from their home in 1995 by a disgruntled contractor who was renovating their home. The VHS tape was copied and sold through underground channels before being widely distributed online. This marked a shift in how private videos could be exploited for profit on a large scale, foreshadowing the digital age of non-consensual intimate images and videos.<sup>36</sup> The trauma this inflicts is profound: Anderson, a rape survivor, later equated the theft of the tape and its release to being raped again.<sup>37</sup>

With the mainstream adoption of the internet, the circulation of stolen and leaked intimate content became easier. Peer-to-peer (P2P) networks like Napster, Limewire, and Kazaa enabled mass file-sharing, making it almost impossible for victims to regain control over their private images once they were online. During this period, websites dedicated to leaked celebrity content began appearing, often profiting off stolen or hacked material.

As video-sharing sites like YouTube (2005) and later Pornhub became dominant, uploading and accessing explicit content became more accessible than ever. This era also saw the rise of revenge pornography, where individuals, often ex-partners, uploaded intimate images and videos without consent to humiliate, blackmail, or harass their victims.

One of the most infamous examples of websites facilitating the posting and sharing of revenge pornography was the website “Is Anyone Up?” (2010-2012), which specialized in revenge pornography. The website encouraged users to submit explicit photos of their ex-partners, often including their full names, social media handles, and locations. The owner of the site, Hunter Moore, became known as one of the first internet trolls, with his website that was developed explicitly to humiliate people. This led to severe harassment and real-world consequences for victims. Similar to Coco.fr in France, Hunter Moore, as the owner of isanyoneup.com, was protected by Section 230.<sup>38</sup> Moore was later convicted of hacking because he had solicited someone to hack into private email accounts to obtain more nonconsensual sexual images for his website. In 2015, he was sentenced to 30 months in federal prison and required to pay a \$2,000 fine.<sup>39</sup>

The 2014 iCloud hack, known as “The Fappening,” saw hundreds of private nude photos of female celebrities—such as Jennifer Lawrence, Kate Upton, and Rihanna—leaked online after hackers accessed their cloud storage accounts. This brought the nonconsensual distribution of private images into the evening news headlines. Almost 500 photos were published, showing mostly women, mostly naked, none of which were intended for the public’s eyes. Three years later, in 2017, it happened again. Images of Amanda Seyfried, Rosario Dawson and Miley Cyrus were posted on a number of websites, including 4chan and Reddit.

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<sup>36</sup> Lucy Cocoran, “The True Story Behind Pamela And Tommy’s Leaked Sex Tape Is Almost Too Crazy To Believe,” *Elle* magazine (May 17, 2021) accessed at <https://www.elle.com.au/culture/news/true-story-behind-pamela-anderson-and-tommy-lee-leaked-sex-tape-25256/>

<sup>37</sup> *PAMELA a love story*, 2023, available on Netflix.

<sup>38</sup> Dave Lee, “IsAnyoneUp’s Hunter Moore: ‘The net’s most hated man,’” *BBC News* (April 20, 2012) accessed at <https://www.bbc.com/news/technology-17784232>.

<sup>39</sup> “Operator of ‘Revenge Porn’ Website Sentenced to 2½ Years in Federal Prison in Email Hacking Scheme to Obtain Nude Photos,” United States Attorney’s Office, Central District of California (Dec. 2, 2015) accessed at <https://www.justice.gov/usao-cdca/pr/operator-revenge-porn-website-sentenced-2-years-federal-prison-email-hacking-scheme>.

By the late 2010s, deepfake pornography emerged as a new threat impacting women with public profiles and middle school girls alike. Using generative artificial intelligence (GenAI), deepfake creators can superimpose a woman's face onto an explicit video, making it appear as though they were engaged in sexual acts.

**Deepfake pornography.** The creation of text, imagery, video, and audio by GenAI has the potential to change the world by automating repetitive tasks and fostering creativity. When employed by bad actors, however, these capabilities have the potential to invade privacy and disrupt the lives of Californians. Since its inception, GenAI has been used to create nonconsensual pornography, more accurately referred to by sexual assault experts as image-based sexual abuse—almost entirely against women and girls.

While high-profile celebrities were most often targeted when this technology was first developed,<sup>40</sup> open-source GenAI models have been exploited to make this technology more accessible and affordable. This has led to a proliferation of websites and phone-based apps that offer user-friendly interfaces for uploading clothed images of real people to generate photorealistic nude images of not only adults, but also children. According to a recent *New York Times* article:

Boys in several states have used widely available “nudification” apps to pervert real, identifiable photos of their clothed female classmates, shown attending events like school proms, into graphic, convincing-looking images of the girls with exposed A.I.-generated breasts and genitalia. In some cases, boys shared the faked images in the school lunchroom, on the school bus or through group chats on platforms like Snapchat and Instagram, according to school and police reports.<sup>41</sup>

In February 2024, deepfake nude images of 16 eighth-grade students were circulated among students at a California middle school.<sup>42</sup> Similar reports of abuses, almost always against girls, have been reported across the country and show no sign of abating.<sup>43</sup> In the first six months of 2024, these sites had been visited over 200 million times.<sup>44</sup> Meanwhile, a 2024 study from Center on Democracy and Technology reports that 40% of students were aware of deepfakes being shared at school, 15% of which depicted an individual in a sexually explicit or intimate manner. In over 60% of these cases, the images were distributed via social media.<sup>45</sup> This provides a potent means of amplifying deepfake nonconsensual

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<sup>40</sup> Brian Contreras, “*Tougher AI Policies Could Protect Taylor Swift—And Everyone Else—From Deepfakes*,” *Scientific American* (Feb. 8, 2024) accessed at [www.scientificamerican.com/article/tougher-ai-policies-could-protect-taylor-swift-and-everyone-else-from-deepfakes/](https://www.scientificamerican.com/article/tougher-ai-policies-could-protect-taylor-swift-and-everyone-else-from-deepfakes/).

<sup>41</sup> Natasha Singer, “*Teen Girls Confront an Epidemic of Deepfake Nudes in Schools*,” *New York Times* (Apr. 8, 2024) accessed at <https://www.nytimes.com/2024/04/08/technology/deepfake-ai-nudes-westfield-high-school.html>.

<sup>42</sup> Mackenzie Tatananni, “*‘Inappropriate images’ circulate at yet another California high school, as officials grapple with how to protect teens from AI porn created by classmates*,” *Daily Mail* (Apr. 11, 2024) accessed at <https://www.dailymail.co.uk/news/article-13295475/Inappropriate-images-California-Fairfax-High-School-AI-deepfake.html>.

<sup>43</sup> Tim McNicholas, “*New Jersey high school students accused of making AI-generated pornographic images of classmates*,” CBS News (Nov. 2,

2023) accessed at <https://www.cbsnews.com/newyork/news/westfield-high-school-ai-pornographic-images-students/>; Lauraine Langreo, “*Students Are Sharing Sexually Explicit ‘Deepfakes.’ Are Schools Prepared?*” *Ed Week* (Sept. 26, 2024) accessed at <https://www.edweek.org/leadership/students-are-sharing-sexually-explicit-deepfakes-are-schools-prepared/2024/09>;

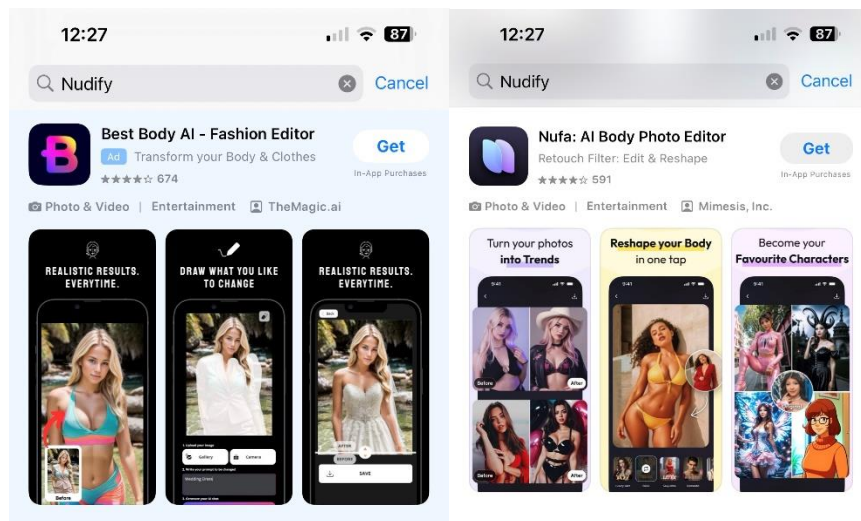
Gabrielle Hunt and Daryl Higgins “*AI nudes of Victorian students were allegedly shared online. How can schools and parents respond to deepfake porn?*,” *The Guardian* (June, 12, 2024) accessed at <https://www.theguardian.com/australia-news/article/2024/jun/12/ai-nudes-of-victorian-students-were-allegedly-shared-online-how-canschools-and-parents-respond-to-deepfake-porn>.

<sup>44</sup> *People of the State of California v. Sol Ecom, Inc, et al.* (2024) Case No. CGC-24-617237, p. 2, [https://www.sfcityattorney.org/wp-content/uploads/2024/08/2024-08-16-First-Amended-Complaint\\_Redacted.pdf](https://www.sfcityattorney.org/wp-content/uploads/2024/08/2024-08-16-First-Amended-Complaint_Redacted.pdf)

<sup>45</sup> Elizabeth Laird, Maddy Dwyer and Kristin Woelfel, “*In Deep Trouble: Surfacing Tech-Powered Sexual Harassment in K-12 Schools*,” Center for Democracy & Technology (Sept. 26, 2024) accessed at <https://cdt.org/wp-content/uploads/2024/09/FINAL-UPDATED-CDT-2024-NCII-Polling-Slide-Deck.Pdf>.



pornography, extending the content's reach by, in effect, crowdsourcing abuse, potentially reaching thousands or even millions of viewers.



The problem has become so pervasive that the United States Department of Justice recently launched the first the first national 24/7 helpline for survivors of image-based sexual abuse.<sup>46</sup> According to RAINN, a non-profit anti-sexual assault organization, more than 100,000 deepfake images and videos are posted on the internet every day.<sup>47</sup> The *2023 State of Deepfakes* report found in its survey of American men that 74 percent of deepfake pornography users did not feel guilty about their consumption. According to the report's authors, this finding suggests that deepfake pornographic content is becoming normalized and accepted. Further, of those surveyed almost one-third of those surveyed stated that they did not think that deepfake pornography hurt anyone as long as it was only used for their personal interest.<sup>48</sup>

In August of 2024, San Francisco City Attorney David Chiu filed a groundbreaking lawsuit against 16 nudification websites.<sup>49</sup> As of the writing of this paper, the lawsuit was still pending.

#### IV. MULTI-PLAYER ON-LINE GAMES AND MISOGYNY

The history of video games, while often celebrated for its innovation and cultural impact, is also deeply intertwined with the pervasive influence of misogyny, a dynamic that has shaped both the industry and the experiences of its players. Both cultural and economic factors have contributed to the exclusion, harassment, isolation, and toxicity that surround women in gaming.

***The Rise of Computer Gaming (1990s-2000s).*** The early 1990s were characterized by an influx of challengers to Nintendo's dominance, which included Sony's PlayStation and Sega's Saturn. As the market became more competitive game developers turned to an untapped part of the market: girls. At this time, it was known that girls were playing some computer games such as the *Oregon Trail* but games were still not made for women and girls. Mattel was able to open up this market with the success of their *Barbie Fashion Designer*, a game where the player could design outfits and print them out for their own dolls. This game was the 9<sup>th</sup> bestselling computer game of 1996, sparking what became

<sup>46</sup> Travers, Karen and Emmanuelle Saliba. "Fake explicit Taylor Swift images: White House is 'alarmed'," *ABC News* (Jan. 26, 2024) accessed at <https://abcnews.go.com/US/white-house-calls-legislation-regulate-ai-amid-explicit/story?id=106718520>.

<sup>47</sup> *Ibid.*

<sup>48</sup> *2023 State of Deepfakes: Realities, Threats, and Impact.* Home Security Heroes, accessed at <https://www.homesecurityheroes.com/state-of-deepfakes/#deepfake-porn-survey>.

<sup>49</sup> Chase DiFelicianantonio, "S.F. sues websites over explicit, nonconsensual AI-generated nude images," *San Francisco Chronicle* (Aug. 16, 2024) accessed at <https://www.sfchronicle.com/sf/article/s-f-lawsuit-deepfake-ai-19657265.php>.

known as the “girls gaming movement”.<sup>50</sup> Many of these games gave women and girls the opportunity to have autonomy in their games, but they also reinforced stereotypes and begged the question whether there was a place for women and girls in mainstream gaming.

At the same time as the girl’s gaming movement, multiplayer online gaming was on the rise, allowing players to connect and compete across the world. The growth of the internet meant that one no longer needed to be in the same room as another person to play together. Massively multiplayer online role-playing game (MMORPG), for example, are games in which players can create characters, explore virtual worlds, and interact with others in real time to accomplish tasks. MMORPGs such as *EverQuest* give players the autonomy to define their identity and form social relationships beyond the constraints of the real world.

Many women who played MMORPGs in the 1990s and early 2000s enjoyed being able to embody roles that differed from their everyday life and enjoyed building relationships with other gamers who share their interests.<sup>51</sup> However, they were limited by the designs provided as shown below, which at the time reinforced stereotypes and played to the target demographic of 18-34 year old men. This often led women who wanted to use a female avatar to take on characters with hyper-sexualized designs. In MMORPG chat rooms, some female players described being objectified by male gamers. One player shared her experience that “You’re sitting there minding your own business and somebody says ‘Hey, nice boobs’. That’s not what my character is. There’s more to my character than her chest – much more than her rack.”<sup>52</sup> Although these early MMORPGs did empower women to take on new roles and develop online relationships, they fell short in allowing women to fully take power of their characters and left them to be objectified by the men who developed and played these games.

Another early online multiplayer game of the era was *Quake*, a first-person shooter with an online “deathmatch” mode, where players hunted each other down in combat. One of the earliest titans of this game was Stevie Case, a woman known as “KillCreek”. Case rose to prominence when she asked to play against the creator of the game, John Romero. In their first match, Romero was victorious. After his victory he took to his website where he wrote, “Don’t ever let a little girl beat you in Deathmatch. Deathmatch is a man’s game and women will never fully understand it. Not with a million rockets up their \*&@#’s.”<sup>53</sup> Although Case later defeated Romero in a rematch, his remarks reinforced a message that women were neither welcome nor taken seriously in these gaming spaces, an attitude that extended beyond individual players and into the culture of online gaming itself.

At the time, game developers did not practice content moderation and the expectation was that players would moderate themselves. In both MMORPGs and games such as *Quake*, women gamers spoke of only wanting to play with people they trusted because of fear that a person may recognize them as a woman and exclude or harass them.<sup>54</sup> Other players described concealing their gender through either their avatar or their name because they did not want to be harassed or targeted for being a woman. These fears reflect real-world concerns that many women are taught while growing up, such as the idea that a woman or girl should always travel in a group or that her choice of clothing makes her a bigger

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<sup>50</sup> Drew Dakessian. “The ‘Girl Games’ of the ‘90s Were Fun and Feminist”. *WIRED* (Mar. 2, 2021) accessed at <https://www.wired.com/story/girl-games-90s-fun-feminist/#:~:text=In%20the%20mid%2D1990s%2C%20she,prospect%20of%20games%20for%20girls.>

<sup>51</sup> T.L. Taylor. “Multiple Pleasures: Women and Online Gaming”. *Convergence: The International Journal of Research into New Media Technologies* (March 2003) accessed at <https://doi.org/10.1177/135485650300900103>.

<sup>52</sup> Alexis Ong. “Inside the groundbreaking 1997 all-women Quake tournament” *PC Gamer* (June 22, 2021) accessed at <https://www.pcgamer.com/inside-the-groundbreaking-1997-all-women-quake-tournament/>.

<sup>53</sup> T.L. Taylor. “Multiple Pleasures: Women and Online Gaming”. *Convergence: The International Journal of Research into New Media Technologies* (March 2003) accessed at <https://doi.org/10.1177/135485650300900103>.

<sup>54</sup> Alexis Ong. “Inside the groundbreaking 1997 all-women Quake tournament” *PC Gamer* (June 22, 2021) accessed at <https://www.pcgamer.com/inside-the-groundbreaking-1997-all-women-quake-tournament/>.

target for predators. The internet may have democratized access to gaming platforms, but the challenges that women have faced in real life have followed them online.

***The Internet and Console Games (2000s-2013)***. As online gaming became more popular, the traditional console games expanded onto the internet. Sony's Playstation 2 began having online connection in 2001, Microsoft's Xbox in 2002, and Nintendo launched their online WiFi connectivity service in 2005. Leading the charge into this landscape was the release of *Halo 2*, the incredibly popular first person shooter game on Xbox. *Halo 2* enabled players on different copies of the game and on different networks to game simultaneously. This success of *Halo 2* led to the development of more games that focus on the online multiplayer experience such as *Call of Duty: Modern Warfare* and sports games such as *Madden* and *FIFA*, which incorporated online play.

These advancements brought console gamers closer to the online experience that PC players had long enjoyed. With the addition of text and voice chat, players could now communicate instantly, strategizing in real time. However, not all gamers benefited equally from these technological advances. Cliff Bleszinski, one of designers for the game *Gears of War*, posited in his memoir that "Online gaming has the power to really unite people in certain instances. The flip side of that coin, as you obviously know, is that you put a microphone and anonymity and a monitor in front of somebody, and suddenly the worst of them can often come out."<sup>55</sup> There was an understanding even among the game developers that there could be harm from their new technology, though they did little to stop it.

The introduction of anonymous messaging and voice-to-chat contact in gaming led to an explosion of verbal abuse. One commenter described the experience: "As soon as [I] plugged my mic in the whole lobby would turn into the KKK."<sup>56</sup> Many gaming lobbies (the term used for the waiting room before a game began) became inundated with racist, sexist, and homophobic slurs, with players facing no real consequences for their actions. YouTube compilations showcase countless instances of players being harassed for simply existing in these spaces.<sup>57</sup> If other players identify that another player is not a young white man, the abuse escalates. For women, online gaming became an especially hostile environment. A 2012 study found that female players received three times as many negative comments as their male counterparts and were significantly more likely to be targeted with messages of harassment.<sup>58</sup> Jenny Haniver, an online gamer in the early 2010s, documented many of the abuses she faced once other gamers recognized her as female. These included, "Get back in the kitchen and take your goddamn hands off a video game controller," "Stupid bitch," "Fat whore," and "I hope your boyfriend beats you. Nah, you can't get a boyfriend."<sup>59</sup> To avoid such comments, many women, similar to their predecessors in computer gaming, chose to remain silent or disguise their gender through neutral usernames and avatars.

Some women tried to reclaim space in gaming communities by exposing the toxicity they faced. The now-defunct website *FatUglyOrSlutty.com*, named after the three most common insults hurled at female gamers, allowed women to share screenshots of the messages they received, as shown

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<sup>55</sup> Justin Charity "The Golden Age of Multiplayer: How Online Gaming Conquered Video Games". *The Ringer* (Jan. 26, 2023) accessed at <https://www.theringer.com/2023/01/26/video-games/online-multiplayer-gaming-video-game-culture-single-player>

<sup>56</sup> *Ibid.*

<sup>57</sup> One such example can be found <https://www.youtube.com/watch?app=desktop&v=D4B51YCXds0>.

<sup>58</sup> Jeffrey H Kuznekoff & Lindsey M. Rose. "Communication in multiplayer gaming: Examining player responses to gender cues". *New Media and Society* (Sept. 13, 2012) accessed at <https://doi.org/10.1177/1461444812458271>.

<sup>59</sup> James Fletcher. "Sexual harassment in the world of video gaming". *BBC World News* (June 4, 2012) accessed at <https://www.bbc.com/news/magazine-18280000>.

below.<sup>60,61</sup> Though this forum served as an outlet for women and brought these challenges that women face to the forefront, this did little to curb the problem of abuse that women face when playing multiplayer games.

Beyond verbal and textual harassment, exclusion was also common. Many women reported being kicked out from servers or matches simply for being female. Others found themselves deliberately targeted by teammates and opponents alike.<sup>62</sup> What had once been a way to find community and connection had, for many women, turned into yet another space where they had to fight for legitimacy. The rise of online gaming revolutionized how people connected and competed, but it also magnified existing social biases. While technology enabled greater access, it did not ensure a welcoming space for all players. Women were forced to either tolerate harassment, hide their identities, or risk exclusion altogether.

***Gamergate and the Current State of Women in Gaming (2014-Now)***. In 2014, the collision of anonymous abuse, underlying gaming culture, and real-world misogyny resulted in the targeted attacks of various prominent women in gaming. Zoe Quinn, an independent game developer, released their game *Depression Quest*, which received positive reviews from gaming outlets and mental health professionals for its depiction of depression. However, Quinn's aggrieved ex-boyfriend, Eron Gjoni, released a blog post that said Quinn's game was only successful because she had sexual relationships with the gaming journalists who reviewed the game. Gjoni included Quinn's email, phone number, address, and other personal information in his post, showcasing one of the first mainstream cases of doxing.<sup>63</sup> The allegations quickly spread across 4chan, a hub for misogyny and radicalization, where enraged users, with the help of Quinn's leaked information, unleashed a torrent of death and rape threats against Quinn.

This marked the beginning of Gamergate, a coordinated online harassment campaign that also targeted women like Anita Sarkeesian and Brianna Wu, who had publicly criticized gaming's male-dominated culture. These women were met with similar abuses, including death and rape threats against themselves and their families. While Gamergate not only exposed the deep-seated misogyny within gaming culture, but also emboldened and legitimized the online harassment tactics discussed in the previous section.

Many game developers offered milquetoast responses to Gamergate, and hardly any mentioned the organized movement by name.<sup>64</sup> This left women gamers stranded as the industry seemed to be saying that they would not work to protect nor defend women, which appeared to some gamers to be a tacit endorsement of Gamergate's rejection of diversity in gaming. As a result, many women sought out safer, more inclusive gaming experiences. In the past decade, there has been an explosion of so called cozy games, in which cute avatars engage in farming, building, gardening, and other activities that are meant to be creative and nurture in-game socialization. These games reached a fever pitch with *Animal Crossing: New Horizon* becoming a cultural phenomenon during the early days of the COVID-19 pandemic.<sup>65</sup> Steam, the online game distributor, now has almost 1,000 games that are tagged cozy.

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<sup>60</sup> Paul Tassi. "Fighting Misogyny in Gaming Begins At Home". *Forbes* (Nov. 12, 2012). Accessed at <https://www.forbes.com/sites/insertcoin/2012/11/30/fighting-misogyny-in-gaming-begins-at-home/>

<sup>61</sup> Donna Dickens. "Fat, Ugly, or Slutty". *Buzzfeed* (Mar. 17, 2011) accessed at <https://www.buzzfeed.com/donnad/fat-ugly-or-slutty>.

<sup>62</sup> Kayleigh Connor. "The Male Domain: Exclusion of Women in Video Games" *Digital America*(Oct. 21, 2013) accessed at <https://www.digitalamerica.org/the-male-domain-exclusion-of-women-in-video-games-kayleigh-connor/>.

<sup>63</sup> Zachary Johnson. "Game of Fear: The Rise of #Gamergate" *Boston Magazine* (Apr. 4, 2015) accessed at <https://www.bostonmagazine.com/news/2015/04/28/gamergate/>.

<sup>64</sup> Brendan Sinclair. "Gamergate was a test and the industry failed" *Games Industry* (Nov. 1, 2022) accessed at <https://www.gamesindustry.biz/gamergate-was-a-test-and-the-industry-failed-opinion>.

<sup>65</sup> Colin Cambell. "What are cozy games, and what makes them cozy?" *Games Industry* (Nov. 28, 2022) accessed at <https://www.gamesindustry.biz/what-makes-a-cozy-game-cozy>.

However, these games are often dismissed by the broader gaming community, which associates them with women and generally refuses to recognize them as “real” gaming experiences.<sup>66</sup>

Despite making up nearly half of all gamers worldwide, women still face disproportionate levels of harassment in multiplayer online games.<sup>67</sup> Between 50-66% of women gamers report being harassed while playing a multiplayer online game in 2023.<sup>68, 69</sup> The abuse against women in these settings begins almost the instant that a gamer is identified as a woman. Many women gamers consider this to be the status quo, with one woman interviewed for the report stating:

“[O]f course this is [when] they would hear that I'm a female. You know all the slurs, all of the lines that they go back to the kitchen . . . you know, all of that happens. Umm, I guess you could just say a lot of the negative experiences cause I'm a girl, you know, and I guess a lot of guy players don't like the [sic] girls are good at games, so they just get real hostile.”<sup>70</sup>

Due to the abuse women face, only 29% of women gamers play multiplayer online games compared to 47% of male gamers.<sup>71</sup> Specifically gendered based toxicity in games causes women to feel symptoms similar to post traumatic stress disorder and can lead to long term withdrawal from gaming.<sup>72</sup> Moreover, over a quarter of women gamers worried that they would be attacked in real life following in-game abuse and threats.<sup>73</sup> Women gamers’ mental health and physical safety are damaged by what they encounter while gaming.

The experiences of women gamers was explored in 2022 by a “Women in Games” study in Argentina. This study used voice modulators to allow for three male professional gamers to inhabit the space that women typically do when they play the first person shooter game *Valorant*.<sup>74</sup> These men, when perceived as women, were completely excluded from the team aspects of the game, being told by their male teammate that they “should be dead instead of playing” and to “get off the game and suck [their] dick”. One of the professional players stated that if they experienced this everyday they “would never want to play this game again.” Many of the women who continue to play these games avoid harassment by muting their systems completely, using gender-neutral usernames, or relying on male partners to

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<sup>66</sup> Sarah Leberknight. “Playing cozy games doesn’t make you less of a gamer” *Collegiate Times* (Mar. 31, 2024) accessed at [https://www.collegiatetimes.com/opinion/playing-cozy-games-doesn-t-make-you-less-of-a-gamer/article\\_dd5798ea-ef71-11ee-8db3-b734f3d7be97.html](https://www.collegiatetimes.com/opinion/playing-cozy-games-doesn-t-make-you-less-of-a-gamer/article_dd5798ea-ef71-11ee-8db3-b734f3d7be97.html).

<sup>67</sup> Center for Technology and Society. “Hate is No Game: Hate and Harassment in Online Games 2023”. *Anti-Defamation League* (Feb. 6, 2024) accessed at <https://www.adl.org/resources/report/hate-no-game-hate-and-harassment-online-games-2023>.

<sup>68</sup> *Ibid.*

<sup>69</sup> Jana Arbanas, Kevin Westcott, Chris Arkenberg, & Jeff Loucks. “For women playing video games, it’s (still) a man’s world” *Deloitte* (Mar. 20, 2024) accessed at <https://www2.deloitte.com/us/en/insights/industry/technology/digital-media-trends-consumption-habits-survey.html#introduction>.

<sup>70</sup> Center for Technology and Society. “Hate is No Game: Hate and Harassment in Online Games 2023”. *Anti-Defamation League* (Feb. 6, 2024) accessed at <https://www.adl.org/resources/report/hate-no-game-hate-and-harassment-online-games-2023>

<sup>71</sup> Jana Arbanas, Kevin Westcott, Chris Arkenberg, & Jeff Loucks. “For women playing video games, it’s (still) a man’s world” *Deloitte* (Mar. 20, 2024) accessed at <https://www2.deloitte.com/us/en/insights/industry/technology/digital-media-trends-consumption-habits-survey.html#introduction>.

<sup>72</sup> Leah Ariela Fredman. “Not Just a Game: Sexual Toxicity in Online Gaming Hurts Women”. *University of Texas* (Dec. 2018) accessed at <https://repositories.lib.utexas.edu/items/3bf1d7f4-7da0-4cff-ac5e-9570fcd71f31>.

<sup>73</sup> Rhiannon Bevan. “75 Percent Of Young Women Report Abuse In Online Games”. *The Gamer* (May 27, 2023) accessed at <https://www.thegamer.com/women-abuse-sexism-in-online-games-depression/>.

<sup>74</sup> Sean Murray. “Male Gamers Face Abuse When Posing As Women In New Study”. *The Gamer* (Dec. 6, 2022) accessed at <https://www.thegamer.com/male-gamers-pose-as-women-study/>.

play alongside them.<sup>75</sup> These coping mechanisms diminish female gamers' ability to engage in the ways the game was meant to be played.

In response to mounting pressure, game developers have introduced new tools to combat toxicity in online gaming spaces. For example, Activision, the developer of *Call of Duty*, worked with Modulate, an AI company that develops tools for voice chat moderation, to incorporate its real-time voice chat moderation into the game. This system does not simply pick up on specific words, but analyzes the context in which they are spoken and flags conversations for human moderators to then review. A study of this system found that 90% of the abuses flagged by their system were gender-based or sexual harassment.<sup>76</sup> The use of AI voice chat moderation enabled Activision to identify and punish five times the amount of harmful content compared to what was found through player reports alone. This showcases how normalized these verbal attacks are in the game, as only 20% of detected cases were reported by players.

Many game developers have rolled out similar types of moderation to combat toxicity on their platforms over the past couple of years, serving as a crucial stepping stone for creating healthier, safer, and more enjoyable gaming environments for all players.

Despite efforts to curb abuse within games, harassment has migrated to third-party platforms, where moderation is more difficult. For example, many gamer communities have moved to Discord, a social platform that enables users to create private servers for text, voice, and video communication. Mickey Carrol, a Sky News reporter, recently went into one of the Discord servers for *Call of Duty*, and within seconds was asked "who is this dirty bitch?" Another player added, "I hate you. You're a filthy female. We don't like females, we like men in here."<sup>77</sup> Unlike Activision, Discord only moderates chat content if a server moderator is present in the chat. Moreover, even if an abuse is reported in a voice-chat, the moderators cannot review the conversation, which results in little to no oversight of these communities, leaving female gamers unprotected.<sup>78</sup>

Similarly, Twitch, Amazon's live-streaming platform, has struggled to address toxicity. Although Twitch uses AI chat moderation, streamers must also provide their own moderators, placing the burden of protection on the individual rather than the platform. One article described a woman gamer's experience on Twitch as follows:

After creating her Twitch account, she was forced to ensure she had active moderators due to misogynistic comments, which often accused her of only having a following due to being a woman. "I found I would receive a lot of emails through my business email that were of a similar nature, and sometimes some very disturbing content, both sexually and borderline abuse from anonymous email accounts," she said.<sup>79</sup>

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<sup>75</sup> Jana Arbanas, Kevin Westcott, Chris Arkenberg, & Jeff Loucks. "For women playing video games, it's (still) a man's world" *Deloitte* (Mar. 20, 2024) accessed at <https://www2.deloitte.com/us/en/insights/industry/technology/digital-media-trends-consumption-habits-survey.html#introduction>.

<sup>76</sup> Dean Takahashi. "How ToxMod's AI impacted toxicity in Call of Duty voice chat | case study". *Venture Beat* (July 18, 2024) accessed at <https://venturebeat.com/games/how-toxmods-ai-impacted-toxicity-in-call-of-duty-voice-chat-case-study/>.

<sup>77</sup> Mickey Carroll. "Why Gaming Still Has A Women Problem". *Sky News* (Sept. 6, 2024) accessed at <https://news.sky.com/story/why-gaming-still-has-a-women-problem-13210551>.

<sup>78</sup> "How To Moderate Voice Channels". *Discord* accessed at <https://discord.com/community-moderation-safety>.

<sup>79</sup> Holly Evans. "'It's dehumanising': Female gamers facing sexual harassment, rape threats and misogyny online". *The Independent* (April 28, 2024) accessed at <https://www.the-independent.com/news/uk/home-news/twitch-female-gamers-sexual-abuse-misogyny-b2535280.html>.

Women streamers remain a small minority on Twitch, accounting for just 8% of gaming content creators. The lack of consistent moderation likely dissuades women from joining.<sup>80</sup> Even Pokimane, the platform's most-watched female gaming streamer, declined to renew her exclusivity contract with Twitch in 2023, citing its culture of toxic masculinity and encouragement of harmful "manosphere" content.<sup>81</sup>

Although the gaming industry has developed tools to combat misogyny in their own games, the abuse has moved into spaces outside of their control. As a result, women and advocates for inclusivity continue to face coordinated harassment campaigns. This past year, a Gamergate 2.0 campaign was coordinated to attack and harass a gaming consultancy firm called Sweet Baby, which specializes in character development and storytelling. Although many gaming companies have made a concerted effort to increase diversity in their games, Sweet Baby became a scapegoat for reactionary gamers, leading to harassment campaigns coordinated through 4chan and Discord.<sup>82</sup> The moderation tools the gaming industry has developed to combat the toxicity on their own services is not enough to change the underlying culture of gaming as it moves around and manifests on various platforms. The prerogative of gamers is to have fun, but for women and girls this goal can come at the cost of their safety.

## V. VIRTUAL RAPE AND SEXUAL ASSAULT

In addition to isolation, exclusion, and harassment, women and girls also experience unwanted sexual interactions on these platforms. One of the earliest documented cases of virtual rape happened in the early 1990s on the text-based virtual platform Lambda Moo, where a man used a program to control two women's avatars to force them into a nonconsensual sexual interaction.<sup>83</sup> Similar events became more frequent on the open-ended virtual world, Second Life, where sexual activity was commonplace and there exists a myriad of claims of rape on the platform, one of which was investigated by the Belgian police.<sup>84</sup> These experiences happened to avatars on the screen; however, as technology becomes more immersive, the experiences that take place in these virtual worlds become realer.

The current frontier of gaming and online communities is virtual reality (VR). These online spaces are generally termed "the metaverse," where users can access a virtual world through the use of specialized headsets and glasses. As these games strive for realism, they often become reflections of the real world dangers that women have to endure. One woman, Jordan Belamire, was playing the VR game *QuiVr*, an archery based game. Belamire began by playing the solo mode of the game and was amazed by the realistic graphics and landscapes. However, once she began to play multiplayer, her experience took a disturbing turn:

So, there I was shooting down zombies alongside another real-time player named BigBro442. The other players could hear me when I spoke, my voice the only indication of my femaleness. Otherwise, my avatar looked identical to them.

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<sup>80</sup> Kristel Anciones-Anguila & Mirian Checa-Romero. "Sexualized culture on livestreaming platforms: a content analysis of Twitch.tv". *Nature* (Feb 12, 2024) accessed at <https://doi.org/10.1057/s41599-024-02841-9>.

<sup>81</sup> Tanya Savkoor. "'Manosphere, Red Pill' Streamer Pokimane Reveals Why She Left Twitch". *She The People* (Feb. 10, 2024) accessed at <https://www.shethepeople.tv/us/streamer-pokimane-leaves-twitch-manosphere-red-pill-3680875>.

<sup>82</sup> Cody Mello-Klein. "The games industry is in the middle of Gamergate 2.0. Experts explain why harassment and vitriol hurt everyone who loves games". *Northeastern Global News* (Nov. 25, 2024) accessed at <https://news.northeastern.edu/2024/11/25/gamergate-backlash-diverse-industry/>.

<sup>83</sup> Julian Dibbell. "A Rape in Cyberspace". *The Village Voice* (Dec. 23, 1993) accessed at [http://www.juliandibbell.com/texts/bungle\\_vv.html](http://www.juliandibbell.com/texts/bungle_vv.html).

<sup>84</sup> Regina Lynn. "Virtual Rape Is Traumatic, but Is It a Crime?" *WIRED* (May 4, 2007) accessed at <https://www.wired.com/2007/05/sexdrive-0504/>.

In between a wave of zombies and demons to shoot down, I was hanging out next to BigBro442, waiting for our next attack. Suddenly, BigBro442's disembodied helmet faced me dead-on. His floating hand approached my body, and he started to virtually rub my chest.

"Stop!" I cried. I must have laughed from the embarrassment and the ridiculousness of the situation. Women, after all, are supposed to be cool, and take any form of sexual harassment with a laugh. But I still told him to stop.

This goaded him on, and even when I turned away from him, he chased me around, making grabbing and pinching motions near my chest. Emboldened, he even shoved his hand toward my virtual crotch and began rubbing. There I was, being virtually groped in a snowy fortress with my brother-in-law and husband watching.

As it progressed, my joking comments toward BigBro442 turned angrier, and were peppered with frustrated obscenities. At first, my brother-in-law and husband laughed along with me — all they could see was the flat computer screen version of the groping. Outside the total immersion of the QuiVr world, this must have looked pretty funny, and definitely not real.

Remember that little digression I told you about how the hundred-foot drop looked so convincing? Yeah. Guess what. The virtual groping feels just as real. Of course, you're not physically being touched, just like you're not actually one hundred feet off the ground, but it's still scary as hell.<sup>85</sup>

Although initially dismissed by many technology reporters, Belamire's assault did not take place in isolation. In 2021, a beta tester for Meta's Horizon Worlds was also groped; however, Meta's internal review suggested that the women should have used their safety features, effectively shifting the responsibility of preventing such attacks onto the users themselves.<sup>86</sup> Despite this, Meta released *Horizon Worlds* to the public in December 2021.

Just after the public release of Horizon Worlds, Nina Jane Patel, using a female presenting avatar, was immediately assaulted upon entering the space:

'I entered the Horizon Venues metaverse as an avatar who looked just like me – middle-aged, blonde and dressed in jeans and a long-sleeved top. The space you enter is a lobby, like a theatre foyer. Within 60 seconds, three male avatars – who all had male voices – came towards me and touched me inappropriately. Before I knew what was happening, they were taking screen shots of them touching my avatar, both my upper and lower body. While doing that, they said things like, "Don't pretend you don't love it." I tried to move away but they followed me. I didn't know who these people were or have the time to stay and investigate.'<sup>87</sup>

In response to these attacks, Ekō, a nonprofit that advocates for social issues, organized a study to better understand the environment of Horizon Worlds. Within an hour of being in the virtual world, one of their researchers was coerced into a room where "she was raped by a user who kept telling her to turn around so he could do it from behind while users outside the window could see – all while another user in the room watched and passed around a vodka bottle." In retrospect, the researcher said "It

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<sup>85</sup> Jordan Belamire. "My First Virtual Reality Groping". *Medium* (Oct. 20, 2016) accessed at <https://medium.com/athena-talks/my-first-virtual-reality-sexual-assault-2330410b62ee>

<sup>86</sup> Tanya Basu. "The metaverse has a groping problem already". *MIT Technology Review* (Dec. 16, 2021) accessed at <https://www.technologyreview.com/2021/12/16/1042516/the-metaverse-has-a-groping-problem/>

<sup>87</sup> Nina Jane Patel. "Reality or Fiction". *Medium* (Dec. 21, 2021) accessed at <https://medium.com/kabuni/fiction-vs-non-fiction-98aa0098f3b0>.



happened so fast I kind of disassociated.”<sup>88</sup> This type of dissociation is common among victims of physical rape and sexual assault and underscores the clear and present dangers in virtual realities.<sup>89</sup> As technology advances, players in the metaverse can now feel the sensations that their avatars would experience through the use of haptic vests and other accessories, these attacks can become more vivid and physical.<sup>90</sup>

Recently, law enforcement in the UK has begun to take virtual rape and sexual assault more seriously. Early in 2024, British authorities launched an investigation into the virtual rape of a 16-year-old girl.<sup>91</sup> Although she did not sustain physical harm, she exhibited psychological trauma consistent with real-world rape survivors. This case, still ongoing, has sparked numerous investigations into virtual sexual violence across Britain.<sup>92</sup>

These cases raise critical legal and ethical questions. Current statutes on sexual assault often require a physical element, but as VR technology becomes more immersive, the psychological impact of these attacks may be comparable to physical attacks. Researchers have demonstrated that these highly immersive digital experiences can actually heighten negative emotional responses, meaning that experiences in VR can have profound real life consequences<sup>93</sup> The victim in the World Horizon’s beta test described their experience as follows: “Even though my physical body was far removed from the event, my brain is tricked into thinking it’s real, because.....you know.....Virtual REALITY. We can’t tout VR’s realness and then lay claim that it is not a real assault”.<sup>94</sup>

## VI. THE CHILLING EFFECT OF ONLINE VIOLENCE AGAINST WOMEN AND GIRLS

Certain groups of women are especially prone to tech-facilitated GBV because of their activities, identities, or access to specific information and services. In particular, human rights defenders, journalists, lawmakers, politicians, women activists, feminists, academics, and young people face increased rates of violence. For example, according to the United Nations Regional Information Center for Western Europe, 73% of women journalists experience online violence in the course of their work.<sup>95</sup>

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<sup>88</sup> SomeOfUs. “Metaverse: another cesspool of toxic content”. (May 2022) accessed at [https://www.eko.org/images/Metaverse\\_report\\_May\\_2022.pdf](https://www.eko.org/images/Metaverse_report_May_2022.pdf).

<sup>89</sup> Rainn “What is dissociation” accessed at <https://rainn.org/articles/dissociation>.

<sup>90</sup> Steve Wollaston. “I tried out the Woojer 3 haptic vest and gaming may never be the same for me again”. *MSN* (Aug. 11, 2024) accessed at <https://www.msn.com/en-gb/lifestyle/shopping/i-tried-out-the-woojer-3-haptic-vest-and-gaming-may-never-be-the-same-for-me-again/ar-AA1tMfMW?apiversion=v2&noservercache=1&domshim=1&renderwebcomponents=1&wcseo=1&batchservertelemetry=1&noservertelemetry=1>.

<sup>91</sup> Chris Vallance. “Police investigate virtual sex assault on girl’s avatar”. *BBC News* (Jan. 2, 2024) accessed at <https://www.bbc.com/news/technology-67865327>.

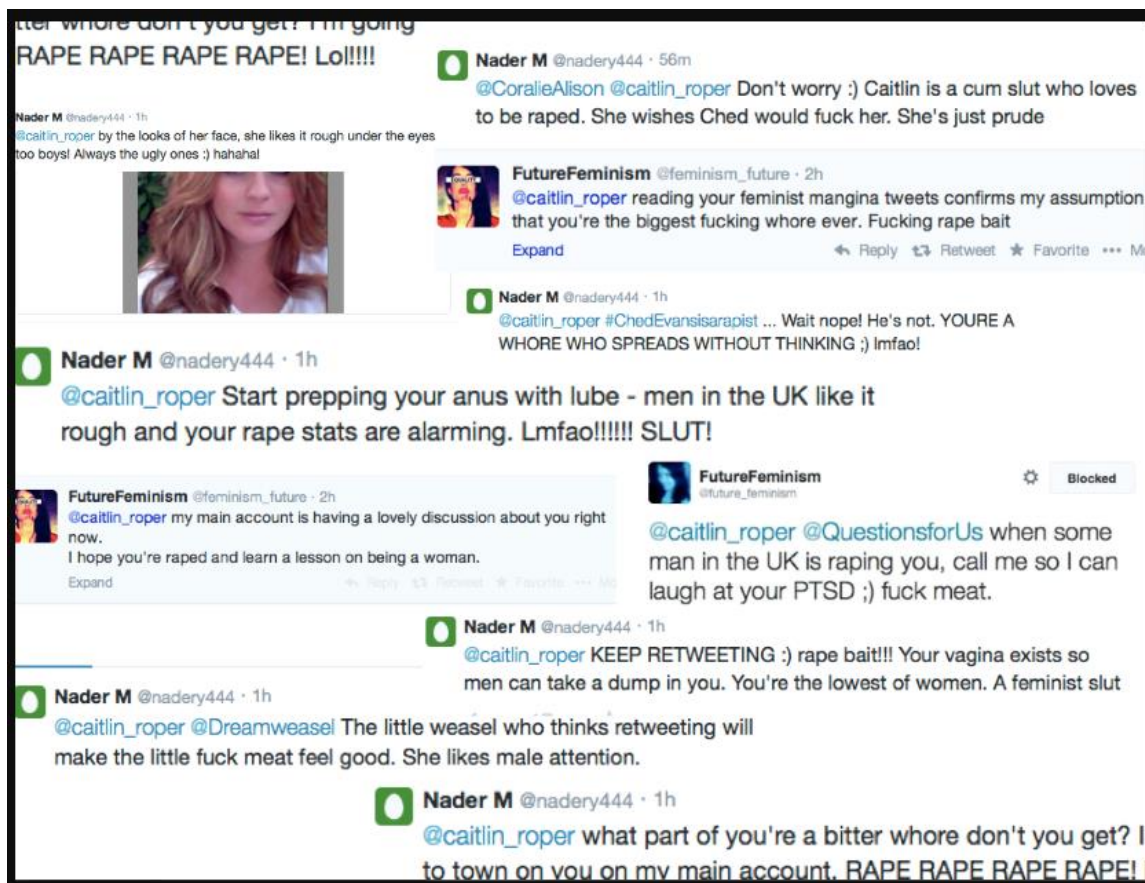
<sup>92</sup> Rebecca Camber “Police investigating dozens of crimes as serious as rape and threats to kill in the metaverse”. *Daily Mail* (Sept. 1, 2024) accessed at <https://www.dailymail.co.uk/news/article-13803125/Police-crimes-rape-kill-metaverse-new-figures-virtual-reality-crimes.html>.

<sup>93</sup> Mel Slater. “Place illusion and plausibility can lead to realistic behaviour in immersive virtual environments”.

<sup>94</sup> Will Duffield. “A Grope in Meta’s Space”. *Cato Institute* (Dec. 28, 2021) accessed at <https://www.cato.org/commentary/grope-metas-space>.

<sup>95</sup> *How Technology-Facilitated Gender-Based Violence Impacts Women and Girls*, United Nations Regional Information Centre of Western Europe (Nov. 11, 2023) accessed at <https://unric.org/en/how-technology-facilitated-gender-based-violence-impacts-women-and-girls/>

## Twitter Rape Threats Received by Journalist Caitlin Roper



Source: Twitter via the Online Hate Prevention Institute accessed at <https://ohpi.org.au/an-experience-of-online-violence-against-women/>

A 2023 study of young women in the UK revealed that their happiness is at the lowest point that it has been since 2009. Approximately 37% of girls and young women aged 11-21 have been sent upsetting photos or content by people they know, up from 17% 10 years ago. For many young women, being attacked online leads to them losing confidence, and withdrawing from posting or getting involved in debates. Instead, they become more passive consumers: 37% of women aged 16 to 24 said online violence had left them feeling less able to express themselves online.<sup>96</sup> Such attacks can impact physical and mental health and impair engagement in public and political life.<sup>97</sup>

## VII. THE RISE AND UBIQUITY OF VIOLENT PORNOGRAPHY

*It makes boys think they can do everything they see in porn in real life. Some things like anal are everywhere in porn but most girls don't want to do that. Boys just think it's normal and expect us all to do it and it puts pressure on us.* – Girl, 16, survey, first saw pornography at age 10<sup>98</sup>

With the advent of high-speed internet, pornography has become more accessible than ever before. Free streaming sites such as Pornhub, Xvideos, and RedTube have placed an endless supply of explicit content at users' fingertips, often without age restrictions. Within this vast library, violent and aggressive forms of pornography, including depictions of choking, slapping, and degradation, have

<sup>96</sup> Hannah Moore. "We get bombarded": study reveals 'shocking' impact of online abuse on girls," *The Guardian*, (Sep. 15, 2023) accessed at <https://www.theguardian.com/society/2023/sep/15/girlguiding-study-reveals-shocking-impact-of-online-abuse-on-girls>

<sup>97</sup> *Online Violence*, Amnesty International accessed at <https://www.amnesty.org/en/what-we-do/technology/online-violence/>

<sup>98</sup> 'A lot of it is actually just abuse' *Young people and pornography*. The UK Children's Commissioner (Jan 2023).

become increasingly mainstream. Young people's exposure to all types of pornography, from a young age, have made them guinea pigs in a vast experiment on the impact of that exposure on children.

Studies indicate that young people are being exposed to pornography at an early age, often before receiving any formal education on healthy sexual relationships. This early and unfiltered exposure can shape their attitudes toward sex, consent, and intimacy in ways that have profound real-world consequences. According to the American College of Pediatricians:

- In 2023, the U.S. generated \$13 billion in revenue from the porn industry.
- The world's largest pornography site, Pornhub, claims 28.5 billion annual visits to its site and averages 800 searches per second.
- The average age of pornography exposure is 12 years old.
- 58% of teens say that they have seen pornography online by accident.
- The majority, 73% of teens, say they have consumed pornography.
- 52% of teens report seeing violent or aggressive behavior in pornography.
- Frequent pornography use may lead to feelings of social isolation and loneliness, lower levels of self-confidence, anxiety, stress, and depression.
- Pornography use is addictive in nature and the neural changes in the brains of users are similar to those seen in individuals addicted to cocaine, alcohol, and methamphetamines.<sup>99</sup>

Peggy Orenstein, the author of *Girls & Sex* and *Boys & Sex*, spent two years interviewing young men across the United States. In those interviews, the men often spoke candidly about their consumption of pornography. She found in her research that the early and constant access to often violent pornography became their primary education about sex and became yoked to “their cycle of desire, arousal, and release.”<sup>100</sup> According to one college sophomore she interviewed:

I started masturbating in sixth grade, about a year after I was first shown porn. I don't think I masturbated without it until at least tenth grade. It was just so easy to get, I didn't consider *not* using it. You go on Pornhub and there's all these categories you can go through. And being able to reach the normal stuff and the weird stuff equally easily is crazy.<sup>101</sup>

As with casual misogyny, violent pornography appears to have found its way into popular culture and impacted the assumptions about what young people expect from their intimate partners, normalizing coercion and sexual violence. A recent study in Australia, for example, surveyed thousands of young people about their experiences of strangulation (or choking) during sex and found more than half (57%) reported being strangled by a partner during sex. About half (51%) said they had strangled their partner during sex. The survey participants commonly reported first becoming aware of strangulation during sex when they were around 16 to 18 years old.<sup>102</sup> Ms. Orenstein also found in her interviews that the young men often were aware of and unhappy with the impact that consuming pornography had on their lives and their need for increasingly aggressive sex. Of one college freshman and his high school girlfriend, Orenstein writes:

Certainly people have predilections, but it is troubling that both instances of aggressive sex Daniel recounted happened when his girlfriend believed their relationship was in jeopardy. Daniel himself considers his behavior to be contrary to the intimacy he claims to crave. He

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<sup>99</sup> *Factsheet: The Impact of Pornography on Children*. American College of Pediatricians – Updated August 2024.

<sup>100</sup> Peggy Orenstein. *Boys & Sex: Young Men on Hookups, Love, Porn, Consent, and Navigating the New Masculinity*. Harper London, 2021, p. 45.

<sup>101</sup> *Ibid.*

<sup>102</sup> “More than half of Australian young people are using strangulation during sex: new research,” *The Conversation* (Jul. 1, 2024) accessed at <https://theconversation.com/more-than-half-of-australian-young-people-are-using-strangulation-during-sex-new-research-231269>.

doesn't know whether that disconnect is natural, part of his wiring as a sexual person, or shaped by his repeated consumption of prepackaged fantasies.<sup>103</sup>

Another young man who was interviewed expressed it this way: "I think porn affects your ability to be innocent in a sexual relationship. The whole idea of exploring sex without any preconceived ideas of what it is, you know? The natural organic process has just been fucked by porn."<sup>104</sup>

The consumption of pornography has been found in a number of studies to impact boys and young men by rewiring their sexual expectations.<sup>105</sup> Among the impacts are:

- Young men report that in consuming pornography they become desensitized and require more intense material to achieve the same level of arousal. This can result in young men developing unrealistic and aggressive sexual expectations that do not align with mutual respect and consent in real-life relationships.
- A growing body of research suggests that young men who consume excessive amounts of pornography, particularly violent or extreme material, may experience porn-induced erectile dysfunction—an inability to become aroused by real-life sexual encounters due to a reliance on highly stimulating digital content.
- Violent pornography often portrays men as dominant aggressors and women as submissive participants who enjoy acts of humiliation and pain. This can distort young men's understanding of sexual dynamics, making coercion and violence appear normal or even desirable.
- Heavy pornography use has been linked to lower relationship satisfaction and difficulty maintaining emotional connections. Young men who rely on porn for sexual gratification may struggle with real-life intimacy, viewing partners as objects for gratification rather than equals in a mutual experience.<sup>106</sup>

Young women, as well, have been impacted by violent pornography becoming mainstream:

- As violent pornography becomes more mainstream, young women often feel pressured to engage in degrading or painful sexual acts—such as choking, slapping, or rough anal sex—even if they are uncomfortable with them.
- Exposure to violent pornography can distort young women's perceptions of consent, making them believe that discomfort and pain are expected parts of sex. Many report feeling unsure of how to set boundaries, fearing rejection or disappointment from male partners who have been conditioned by pornographic scripts.
- The normalization of aggression in pornography has been linked to higher rates of sexual coercion and violence. Research suggests that young men who frequently watch violent pornography are more likely to dismiss the importance of clear consent and engage in coercive behaviors, putting young women at greater risk of harm.
- Women in pornography are often portrayed as passive objects meant to satisfy male pleasure. This can lead to additional body image issues and lower self-esteem in young women, who may feel additional pressure to conform to unrealistic beauty standards and sexual performance expectations.<sup>107</sup>

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<sup>103</sup> Orenstein, p. 57

<sup>104</sup> *Ibid.*

<sup>105</sup> Bhuptani, P. H., Cashin, D., & Orchowski, L. M. (2024). The Impact of Violent Pornography on Sexual Coercive Behaviors Among College Men: A Prospective Examination. *Journal of Interpersonal Violence, 0(0)*.

<sup>106</sup> *Ibid.*

<sup>107</sup> 'Aggression, strangulation, coercion': The 'concerning' impact of porn on young people. SBS News, Australia, (Nov. 13, 2024) accessed at <https://www.sbs.com.au/news/article/aggression-strangulation-coercion-the-concerning-impact-of-porn-on-young-people/bo3wierrq>.

The widespread availability of violent pornography has reshaped the sexual expectations of young men and women, often in ways that are harmful to intimacy, consent, and mutual pleasure. Excessive consumption can lead to desensitization, unrealistic expectations, and difficulty with real relationships, while young women face increased pressure to perform acts that they may not be comfortable with. Addressing these issues requires better education, open conversations, and greater accountability from the industry that profits from harmful content.

## VIII. AI GIRLFRIENDS

One of the more recent developments in artificial intelligence is the growing popularity of AI girlfriend apps. These platforms provide “digital companionship” through an AI chatbot that can be created by the user to fit specific characteristics that they choose. The chatbots can then hold conversations over texting or voice chat and can even send nude pictures if requested. Developers refer to these chatbots as “relationship-based AI.” They are often marketed as a way to provide someone with emotional support and more control in their relationships. Popular features of these apps include:

- Customization: Users can personalize their AI companion’s appearance, voice, and personality.
- Emotional Interaction: AI can respond with emotions, making interactions more engaging.
- Roleplay & Gamification: Some apps integrate storytelling, romance, and interactive games for entertainment.
- 24/7 Availability: AI companions are always online, providing comfort whenever needed.<sup>108</sup>

The growing popularity of these chatbots has raised significant concerns among researchers. A recent study from the Wheatley Institute found that nearly one in three young men (aged 18 to 30) and one in four young women surveyed responded that they had chatted with an AI girlfriend or boyfriend.<sup>109</sup> According to the authors of the study:

A notable portion of individuals reported that they use AI technologies for sexual purposes, with nearly 1 in 10 reporting that they have masturbated while talking to an AI companion or viewing AI sexualized images. Young adult men are more than twice as likely to view AI pornography than young adult women (27% of young adult men vs. 12% of young adult women) and adult men are three times more likely to view AI pornography than adult women (12% of adult men vs. 4% of adult women). However, it is worth noting that young adult women are as equally likely as adult men to report viewing AI pornography and are three times more likely to view such media than adult women (12% vs. 4%).<sup>110</sup>

Disturbingly, many people using AI relationship technologies report that they prefer AI communication over interacting with a real person in a relationship.<sup>111</sup> In fact, it appears that users are spending more and more time with their AI companions. According to *The Washington Post*, in September 2024, the average user of a Character.ai companion app spent 93 minutes a day talking to a chatbot. “That’s 18 minutes longer than the average user spent on TikTok.”<sup>112</sup> The story raises several recent events that have alarmed experts:

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<sup>108</sup> Lakisha Davis “The Rise of AI Girlfriend Apps: How Artificial Intelligence is Redefining Digital Companionship,” *metapress* (Feb. 13, 2025) accessed at <https://metapress.com/the-rise-of-ai-girlfriend-apps-how-artificial-intelligence-is-redefining-digital-companionship/>.

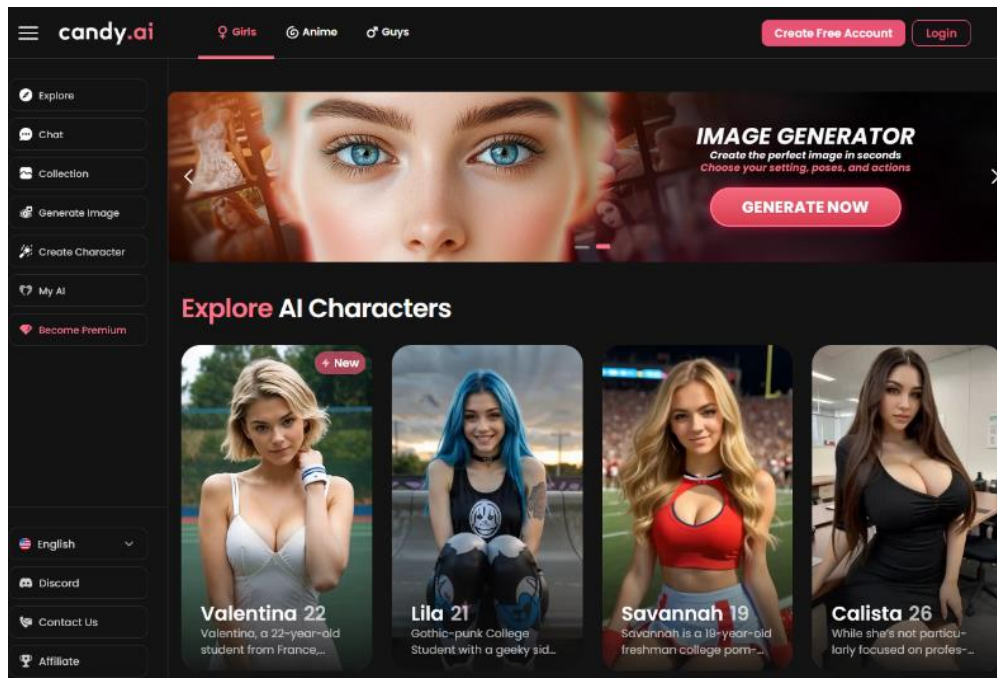
<sup>109</sup> Brian Willoughby, Jason Carroll, Carson Dover, and Rebekah Hakala. *Counterfeit Connections: The Rise of Romantic AI Companions and AI Sexualized Media Among the Rising Generation*, Wheatley Institute (2025) accessed at <https://wheatley.byu.edu/Counterfeit-Connections-AI-Romantic-Companions>.

<sup>110</sup> *Ibid.*

<sup>111</sup> *Ibid.*

<sup>112</sup> Nitisha Tiku. “AI friendships claim to cure loneliness. Some are ending in suicide.” *The Washington Post* (Dec. 6, 2024) accessed at <https://www.washingtonpost.com/technology/2024/12/06/ai-companion-chai-research-character-ai/>.

But public advocates are sounding alarms after high-profile instances of harm. A 14-year-old Florida boy died by suicide after talking with a Character.ai chatbot named after the character Daenerys Targaryen from “Game of Thrones”; his mother sued the company and Google, which licensed the app’s technology. A 19-year-old in the United Kingdom threatened to assassinate the queen, encouraged by a chatbot on the AI app Replika and was sentenced to nine years in prison.<sup>113</sup>



The *Post* further reports that in July 2024 the Belgium police launched an investigation into one AI companion company after a Dutch man died by suicide following an extensive relationship with an AI companion.<sup>114</sup> In addition to emotional dependence and manipulation, AI girlfriends can exacerbate loneliness, displace real-life relationships, inhibit social growth, create unrealistic expectations about companionship, and distort expectations about gender roles.<sup>115</sup>

## IX. MALE SUPREMACISTS: THE RADICALIZATION OF BOYS AND MEN ONLINE

*The Manosphere* is a broad term that refers to a wide variety of men’s groups operating on the internet. Generally, the term is used to specifically describe interconnected misogynistic communities. Though some describe it more broadly as the places on the internet where men connect, encompassing everything from wellness and fitness sites to sites where violent misogynists gather. The rise of these groups tracks a disturbing downturn in the wellbeing among young men.

<sup>113</sup> *Ibid.*

<sup>114</sup> *Ibid.*

<sup>115</sup> Susan Trachman, “The Dangers of AI-Generated Romance,” *Psychology Today* (Aug. 18, 2024) accessed at <https://www.psychologytoday.com/us/blog/its-not-just-in-your-head/202408/the-dangers-of-ai-generated-romance?msocid=396cc204796e68e336e7d64978db69ac>.



***The decline in young male wellbeing.*** A growing body of data has demonstrated that young men in the U.S. are facing very real problems in educational attainment, economic viability, social and romantic relationships, and mental health:

- Nearly one in five men do not graduate from high school.<sup>116</sup> 47% women ages 25 to 34 have a bachelor's degree, compared with 37% of men.<sup>117</sup>
- 36% of men aged 18-34 live in their parents' home.<sup>118</sup>
- One in three men under the age of 30 has a girlfriend, while two in three women under the age of 30 have a boyfriend – as they seek older, more stable partners.<sup>119</sup>
- One in seven men reports having no friends.<sup>120</sup>
- Three of every four deaths of despair – suicides and drug overdoses are men.<sup>121</sup> Males make up 50% of the population but nearly 80% of suicides.<sup>122</sup>

In a recent study, researchers found that life in many Western nations has become more socially isolating for everyone in the last 100 years. “Men, however, are at the highest risk of social isolation, especially when they live in a country where people value individualism highly.” Men lack friends on whom they can rely. Men have come to rely disproportionately on women for social support, therefore, when they are not in romantic partnerships, their networks often shrink.<sup>123</sup> As a result, many turn to online spaces looking for consolation or solutions to their problems.

***Falling down the manosphere rabbit hole.*** Many men enter the manosphere while searching for dating advice, self-improvement tips, or explanations for personal difficulties in relationships. They may start with seemingly harmless content like fitness advice, confidence-building, or discussions about societal expectations for men, only to find themselves drawn more deeply into extreme content. Equimundo, an international center focused on masculinities and social justice, writes:

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<sup>116</sup> Scott Galloway, “Boys to Men” *No Mercy/No Malice* (Jul. 21, 2023), accessed at <https://www.profgalloway.com/boys-to-men/>.

<sup>117</sup> Kiley Hurst, “U.S. women are outpacing men in college completion, including in every major racial and ethnic group” *Pew Research Center* (Nov. 18, 2024), accessed at <https://www.pewresearch.org/short-reads/2024/11/18/us-women-are-outpacing-men-in-college-completion-including-in-every-major-racial-and-ethnic-group/>.

<sup>118</sup> Scott Galloway, “Boys to Men” *No Mercy/No Malice* (Jul. 21, 2023), accessed at <https://www.profgalloway.com/boys-to-men/>.

<sup>119</sup> Sean Illing, “Are men okay? Our modern masculinity problem, explained” *The Gray Area* (Dec. 16, 2024), podcast transcript accessed at <https://www.vox.com/the-gray-area/390781/masculinity-scott-galloway-young-men-struggling>.

<sup>120</sup> Scott Galloway, “Boys to Men” *No Mercy/No Malice* (Jul. 21, 2023), accessed at <https://www.profgalloway.com/boys-to-men/>.

<sup>121</sup> *Ibid.*

<sup>122</sup> Centers for Disease Control, *Suicide Prevention Data Sources*, accessed at <https://www.cdc.gov/suicide/resources/data-sources.html>.

<sup>123</sup> Angelica Puzio Ferrara and Dylan Vergara, “The Hidden Costs of Men’s Social Isolation,” *Scientific American* (Feb. 14, 2025) accessed at <https://www.scientificamerican.com/article/the-hidden-costs-of-mens-social-isolation/>

When two-thirds of young men feel that “no one really knows” them, as State of American Men 2023 shows, they reveal the fragility of their connections and relationships. This “crisis of connection” collides with the reality that no one really seems to agree on what a “good man” looks like or how to become one. The combination of these two truths creates the perfect conditions for men to seek connection in the digital world via the manosphere – a diverse collection of websites, blogs, and online forums promoting masculinity, misogyny, and opposition to feminism – which swoops in to provide clear messages around gender and gender roles to make simple sense of an otherwise complicated world. These messages have a real impact, mostly surrounding violence (against oneself and others), mental health, and anti-democratic trends. Amidst rapid macro-level social, political, and economic changes, young men are turning to the internet and finding community and belonging that speak to their unique identities, interests, and fears.<sup>124</sup>

These messages provide an easy scapegoat for struggling young men—women, feminism, or society at large—rather than encouraging introspection or personal growth. Over time, engaging with these communities gives men a sense of belonging, as they bond over shared grievances, often resulting in their slow indoctrination into extreme misogyny and male supremacy.<sup>125</sup> The radicalization often starts with what first seem to be harmless jokes and memes, with the rhetoric becoming serious over time:



In a 2020 interview with a New Zealand radio station, Laura Bates, the author of *Men Who Hate Women*, discussed her experiences talking with school age boys in UK schools about sexism and misogyny and started to notice disturbing trends. She started to notice there was a very dramatic and concerning uptick in the number of boys who had been radicalized or groomed.

“If it was any other form of extremism or hatred of any other group, we would describe it that way, but because it’s just women, just misogyny, we don’t use those words to describe it.” She encountered boys of 13 and 14 who believe that there is a feminist conspiracy at the heart of government that white men are losing their jobs in the thousands to women and that 90 percent of rape allegations are false.

“This was something very different, this was the repetition of false statistics by boys utterly convinced that they were true. I started to see the same quotes and the same statistics being circulated by boys in completely different schools in different areas of the country.”

It became clear to her these boys were being groomed by a sprawling network of extreme misogynist online communities. “We are actually talking about a vast network of inter-

<sup>124</sup> Brito, P., Hayes, C., Lehrer, R., & Mahler, J., Salinas Groppo, J. *The Manosphere, Rewired: Understanding Masculinities Online & Pathways for Healthy Connection*. Equimundo. (2024) accessed at <https://www.equimundo.org/resources/manosphere-rewired/>.

<sup>125</sup> Ben Rich and Eva Bujalka. “The draw of the ‘manosphere’: understanding Andrew Tate’s appeal to lost men” *The Conversation* (Feb. 12, 2023) accessed at <https://theconversation.com/the-draw-of-the-manosphere-understanding-andrew-tates-appeal-to-lost-men-199179>.



connected blogs, forums, membership websites and social media platforms.” Some of these sites have members upwards of 100,000 members, she says.

Teenage boys are being cleverly influenced by reaching them where they interact online, Bates says. “These groups are taking their material and smuggling it into everything from viral YouTube videos, to Instagram memes, they are deliberately seeking out teenage boys on body building forums.” They are also joining live gaming groups. “The leaders of these communities describe using things like viral YouTube videos and Instagram memes in order to convert and lure in young people as adding cherry flavour to children’s medicine.”

These groups are “extremely deft” at manipulating the YouTube algorithm, she says. “There are repeated reports of investigations by data scientists who have suggested that there is an enormously influential influencer network on YouTube of far right and misogynistic extremists.” YouTube has enormous power and reach for young people, Bates says.<sup>126</sup>

**Male supremacy.** According to Southern Poverty Law Center (SPLC), “Male supremacy is a hateful ideology rooted in the belief of the supposedly innate superiority of cisgender men and their right to subjugate women, trans men and nonbinary people.” Male supremacists generally view women as genetically inferior, manipulative, and stupid. Many of these groups reduce women to their reproductive function, “simultaneously shaming women for having sex while believing that sex is something women owe men. Adherents of this ideology fixate on rigid gender roles and vilify any deviation from their strict gender dichotomy, seamlessly weaving together misogyny, transphobia and homophobia.”<sup>127</sup> “Male supremacism manifests in various ways, including physical and sexual violence, militarism, and exertion of control over women’s, trans men’s, and non-binary people’s bodies.”<sup>128</sup>

Broadly, male supremacist groups subdivide into incels, pickup artists, “men going their own way,” and men’s rights activists.<sup>129</sup> These groups, which are connected by a network of websites, blogs, forums, podcasts, YouTube channels, and chat rooms, are organized around differing ideologies, but share a common assumption that men are victims of an oppressive feminist system that has deprived them of their rightful place in society.<sup>130</sup>

### **Incels**

*“I hate all women. They are the scum of the earth. If you’re a woman and you happen to be reading this – I hate you fucking whore.”* –Comment on an incel forum

Misogynistic “incels” – a term used in male supremacist forums to describe “involuntarily celibate” (heterosexual) men who say they’re unable to attract women for sex or relationships<sup>131</sup> – are considered one of the most dangerous male supremacist communities. Members of this group believe they are entitled to sex with attractive women, but claim feminism and evil, selfish women have denied them of

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<sup>126</sup> Author Interview: Laura Bates on toxic misogyny and men who hate women, RNZ Radio (Nov. 19, 2020) accessed at <https://www.rnz.co.nz/national/programmes/ninetoon/audio/2018773470/laura-bates-on-toxic-misogyny-and-men-who-hate-women>.

<sup>127</sup> Male Supremacy, The Southern Poverty Law Center accessed at <https://www.splcenter.org/resources/extremist-files/male-supremacy/>.

<sup>128</sup> What Is Male Supremacism? Institute for Research on Male Supremacism accessed at <https://www.theirms.org/what-is-male-supremacism>

<sup>129</sup> IRMS includes in its definition of male supremacist groups movements within the “religious right,” particularly anti-abortion and purity movements—subjects that are outside the scope of this background paper.

<sup>130</sup> Bates. p. 5

<sup>131</sup> While women, men and non-binary people can identify themselves as “incels” without holding views that are rooted in misogyny, for the purposes of this section the focus is on the misogynist incel men’s movement that is shaped around glorifying extreme violence and dehumanizing women.

this right. Essentially, misogynist incels believe they live in a gynocentric society that favors women to the detriment of men. Specifically, incels believe that “in this gynocentric system, feminism creates a rigged, hierarchical ‘sexual marketplace’ that unjustly gives women all the power in choosing partners.”<sup>132</sup>

The incel community has developed a shared vocabulary to generalize men and women into different tiers and types, based on their social status and physical attractiveness:

Alphas, Betas and Omegas – Alphas are men that are considered sexually “successful” and traditionally handsome, and are generally characterized as confident, assertive and dominant. Betas are ‘normies’ who can achieve sex but will never be able to prevent Stacys from sleeping with Chads.

Chads, Stacys, Beckys – Chads are considered the opposite of incels in that they are “successful” with women and “conventionally handsome”. Incels may refer to Chads in a mocking sense or with admiration.

Stacys are the female equivalent to Chads, but generally referred to more negatively than Chads are. Stacys are often characterized as beautiful, hyperfeminine but “dumb” and promiscuous. Incels believe Stacys will only go for Chads or “Alphas”. Beckys are considered less attractive than Stacys, but still unattainable for incels.<sup>133</sup>

Bates, an expert on violent misogyny, researched the manosphere by adopting an online persona of a 24-year-old incel. She identified the incel community as the most violent corner of the manosphere:

It is a community devoted to the violent hatred of women. A community that actively recruits members who might have very real problems and vulnerabilities and tells them that women are the cause of all of their woes. A community in whose name over one hundred people, mostly women, have been murdered or injured in the last ten years.<sup>134</sup>

In the words of incels who engaged in extreme acts of violence:

“If I can’t find one decent female to live with, I will find many indecent females to die with. If they are intent on denying me life, I will have no choice but to deny them life. ... Their arrogance, indifference, and treachery will finally be exposed, and punished. If I can’t make a living, I will make a killing.” – Scott Paul Beierle in a note he wrote shortly before his attack at Hot Yoga Tallahassee, Nov. 2, 2018

“It’s basically a movement of angry incels such as myself who are unable to get laid therefore, we want to overthrow the Chads which would force the Staceys to be forced to reproduce with the incels.” – Alek Minassian’s confession in a police interview following his attack, April 24, 2018

“I will be a god, punishing women and all of humanity for their depravity. ... I cannot kill every single female on earth, but I can deliver a devastating blow that will shake all of them to the core of their wicked hearts. I will attack the very girls who represent everything I hate in the female gender” – Elliot Rodger in his manifesto “My Twisted Life,” May 23, 2014<sup>135</sup>

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<sup>132</sup> *Misogynist Incels*. The Southern Poverty Law Center accessed at <https://www.splcenter.org/resources/extremist-files/misogynist-incels/>

<sup>133</sup> ISD Explainer The Manosphere available at <https://www.isdglobal.org/explainers/the-manosphere-explainer/>

<sup>134</sup> Bates, pp. 1-2.

<sup>135</sup> *Misogynist Incels*. The Southern Poverty Law Center accessed at <https://www.splcenter.org/resources/extremist-files/misogynist-incels/>

In 2014, Elliot Rodger committed perhaps the best known incident of the extreme violence, killing six people and injured 14 others near the University of California, Santa Barbara. He had planned the attack for over a year and spent thousands of dollars arming and training himself to kill as many people as possible. Rodgers uploaded a video to YouTube and posted a 137-page essay explaining his motives.<sup>136</sup> This “manifesto,” vowing to take revenge on the women of Isla Vista for perceived slights, and his actions, have made him a hero in the incel community.

### ***Pick-up Artists***

“You just fucking push, push, push, and it can’t not work.” – Pick up artist quoted in *The Game*

Pickup culture has been around for decades. Psychologists adopted the term after realizing the potential profit associated with writing books mixing self-help and psychological techniques with the promise of helping their readers find sexual partners. This genre started with *The Art of Erotic Seduction* by Robert Ellis and Roger Conway published in 1967, followed by dozens of other books, and culminating with perhaps the most well-known, *The Game*, written by journalist Neil Strauss and marketed as an exposé of pickup artists (PUA). The book was packaged in black leather with gold-edged pages and a red satin bookmark, deliberately marketed to look like the Bible. It ultimately sold over 5 million copies, introducing millions of heterosexual men to PUA principles.<sup>137</sup>

PUAs use psychological tactics and manipulative techniques to seduce women. The PUA community teaches “game,” which includes scripted routines, “negging” (subtle insults to lower a woman’s self-esteem), and other tactics aimed at breaking down a woman’s resistance to sexual advances. The SPLC has identified PUAs and other “alpha” males as:

[A] male supremacist community of heterosexual men who share predatory and coercive strategies aimed at manipulating women into sex. PUAs and alpha males endorse engaging in sexual harassment, stalking and even sexual violence. This community contains influencers who, in some cases, profit enormously from selling their misogynistic worldview and “techniques.”<sup>138</sup>

PUAs define their masculinity and social value around their sexual successes, which creates a toxic sense of entitlement to women. PUAs believe they are the victims of an oppressive feminist system. However, while other misogynistic groups diagnose their problems as societal ones and cast themselves as the victims, PUAs view their problems as individual and capable of being solved by adopting certain self-help techniques espoused by internet influencers who claim to be experts at “gaming” women into have sex with them.

One such PUA influencer is Andrew Tate, a former kickboxing world champion turned “success coach” who promotes the exploitation and control of women. For a fee, men can sign up for access to Tate’s online content. One entry, advertised as “Tate webcam program,” claims to be a “‘PhD course’ to ‘teach you how to obtain and retain unlimited beautiful women and . . . turn them into cold hard cash.’”<sup>139</sup>

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<sup>136</sup> Joseph Serna. “Elliot Rodger meticulously planned Isla Vista rampage, report says,” *Los Angeles Times* (Feb. 19, 2015) accessed at <https://www.latimes.com/local/lanow/la-me-ln-santa-barbara-isla-vista-rampage-investigation-20150219-story.html>.

<sup>137</sup> Bates pp. 75-77

<sup>138</sup> *Pickup Artists, Alpha Males, and the Male Supremacist ‘Self Help’ Industry*. The Southern Poverty Law Center accessed at <https://www.splcenter.org/resources/extremist-files/pickup-artists-alpha-males-self-help/>.

<sup>139</sup> Maya Oppenheim. “The murky online world of Andrew Tate and ‘pick-up artists,’” *Independent* (Jul. 2, 2023) accessed at <https://www.independent.co.uk/news/world/europe/andrew-tate-pick-up-artists-b2363217.html>

Other PUA courses purport to teach heterosexual men how to lie, intimidate, and manipulate women. In 2019, UK journalist Myles Bonnar went undercover in the PUA community for the *Independent*. He joined a “seduction boot camp,” which he described as a weekend course “during which men desperate for sex set themselves back £1,500 to learn to persuade women to go to bed with them, making the ‘cold approach’ on the street and securing ‘same-day lays.’”<sup>140</sup> The coaches at this particular boot camp put hidden microphones on their students and listened as the men approached young women, testing out several techniques they had been taught. These recordings were then uploaded onto the coaches’ YouTube channels, along with video footage of the interactions. According to the report, some of the footage included audio recordings of sexual encounters. All of the recordings seemed to have been taken without the women’s knowledge.<sup>141</sup>

Underlying PUA are deeply problematic notions of consent. Indeed, Andrew Tate stated on Twitter “If you put yourself in the position to be raped, you must bare [sic] some responsibility.”<sup>142</sup> Another prominent PUA influencer, Roosh V., stated:

“Make rape legal if done on private property. I propose that we make the violent taking of a woman not punishable by law when done off public grounds. ... If rape becomes legal under my proposal, a girl will protect her body in the same manner that she protects her purse and smartphone. ... After several months of advertising this law throughout the land, rape would be virtually eliminated on the first day it is applied.”<sup>143</sup>

### ***Men’s Rights Activists***

*“In many cases, accusers will falsely report to the police that a man drugged them and raped them. What really happened is that they had fully consensual sex with the man, but don’t remember giving consent, or anything else, because of the alcoholic-induced amnesia.”* – National Coalition for Men in a brochure titled “False Reporting of Sexual Misconduct: Understanding the Myths,” Nov. 29, 2020<sup>144</sup>

Men’s Rights Activists (MRA) see themselves as defending men from the increasing oppression that has resulted from feminism and the gains made by women in recent decades. Unlike incels who define themselves by the status of their sex life or lack of relationships with women, MRA criticize gender equality, women’s rights, and women’s status in society more broadly. Some believe, for example, that women’s suffrage, women’s right to education and to a life in the public sphere rather than just domestic sphere have all contributed to a declining status and power of men in society, and that these advances need to be reversed. As described by the McCain Institute:

MRA movements generally make a more concerted effort to “formalize” their discourse by framing it within academic terms, thus adding a false sense of legitimacy to their claims. For example, A Voice for Men, one of the most visible MRA websites, claims its mission statement is to “provide education and encouragement to men and boys: to lift them above the din of misandry, to reject the unhealthy demands of gynocentrism in all its forms...”. While this seems harmless, the site is full of misogynistic content. In an audio recording on the site, for example,

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<sup>140</sup> *Ibid.*

<sup>141</sup> Harriet Hall. “Sleazy pick-up artists are thriving – and they’re exploiting men’s insecurities over #MeToo to do it.” *Independent* (Oct. 8, 2019) accessed at <https://www.independent.co.uk/voices/seduction-boot-camp-panorama-pick-up-artists-metoo-misogyny-a9148041.html>

<sup>142</sup> Andrew Tate, Twitter Account, Oct. 18, 2017.

<sup>143</sup> Daryush “Roosh” Valizadeh in an article posted on Return of Kings titled “How to Stop Rape,” February 2015.

<sup>144</sup> *Men’s Rights Activists*. The Southern Poverty Law Center accessed at <https://www.splcenter.org/resources/extremist-files/mens-rights-activists/>

the site's founder states that "p\*\*\*\* is the only real empowerment women will ever know", effectively belittling women down to sexual objects.<sup>145</sup>

Despite claiming to fight for equality for men, MRA rhetoric and actions are generally targeted at attacking women and feminism. The male supremacist rhetoric includes arguing that women are the perpetrators of gender based violence. According to the SPLC:

[M]en's rights activists use misleading and outright false statistics and research to argue that women are the primary perpetrators of gender-based violence and deny the epidemic of violence against women. At the same time, MRA rhetoric often argues that women deserve or are responsible for the violence perpetrated against them.

In a 2010 blog post about rape, MRA Paul Elam wrote, "There are a lot of women who get pummeled and pumped because they are stupid (and often arrogant) enough to walk though [sic] life with the equivalent of a I'M A STUPID CONNIVING BITCH – PLEASE RAPE ME neon sign glowing above their empty little narcissistic heads." Similarly, in a blog titled "The Necessity of Domestic Violence," another prominent MRA, Matt Forney, wrote "Women should be terrorized by their men; it's the only thing that makes them behave better than chimps."<sup>146</sup>

### ***Men Going Their Own Way***

*"I have never concealed my intense dislike for this devolved creature, the 'woman.'* – Comment on the MGTOW.com forum

Generally, the Men Going Their Own Way (MGTOW) members advocate for men separating themselves from women altogether and forming a single-gender society. Laura Bates found, in some ways, that MGTOWs are less dangerous than other factions of the manosphere. She writes, "The self-imposed exile, in some respects, renders MGTOW less of an immediate threat to women than incels or PUAs. Unlike other manosphere communities, the majority of their energy is focused inward rather than outward." Their obsession with abstaining from sex and relationships with women means they are more likely to harm themselves than the women around them.<sup>147</sup>

As with other manosphere groups, MGTOWs blame feminism for the decline of modern men. Unlike other anti-feminist groups that celebrate patriarchy and may advocate for confining women to the domestic sphere, MGTOW affiliates advocate for a world without women. The McCain Institute notes that MGTOW have strict entry requirements and provide potential affiliates with stages through which they can track their commitment to the MGTOW cause:<sup>148</sup>

MGTOWs typically see all women as inferior, illogical, and manipulative. "In this misogynistic worldview, women are parasitic and form relationships with men to gain access to their money and status. Meanwhile, they argue men are intelligent, rational risk-takers who created civilizations and thus

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<sup>145</sup> *The Threat Landscape: Incel and Misogynist Violent Extremism*, The McCain Institute accessed at <https://www.mccaininstitute.org/wp-content/uploads/2021/10/incel-and-misogynist-violent-extremism-read-ahead-materials-august-2.pdf>

<sup>146</sup> *Men's Rights Activists*. The Southern Poverty Law Center accessed at <https://www.splcenter.org/resources/extremist-files/mens-rights-activists/>

<sup>147</sup> Bates, p. 97

<sup>148</sup> *The Threat Landscape: Incel and Misogynist Violent Extremism*, The McCain Institute accessed at <https://www.mccaininstitute.org/wp-content/uploads/2021/10/incel-and-misogynist-violent-extremism-read-ahead-materials-august-2.pdf>

should be able to dominate women.” In addition to their misogyny, they are often extremely homophobic and transphobic.<sup>149</sup>

Research from 2020 suggests that MGTOWs are attracting members from other male supremacist groups. The main MGTOW subreddit had 15,000 subscribers in 2016. Three years later subscribers had grown by over 600% to 104,000. Before the subreddit was eventually banned, the community had grown to nearly 150,000 subscribers.<sup>150</sup>

In fall 2017, the #MeToo campaign went viral as millions of women came forward to share their personal stories and speak out against sexual harassment and violence they had experienced. According to the SPLC, just as quickly as the campaign took off, mainstream media outlets and celebrities began platforming formerly fringe MGTOW beliefs, arguing that men should isolate themselves from women to avoid being accused:

Rather than reckon with the widespread problem of sexual harassment, men opted to discriminate against women in the workplace, echoing the MGTOW creed that women are dangerous and must be avoided. At the 2019 World Economic Forum, several attendees voiced their concerns about working with women. One unnamed American finance executive told *The New York Times*, “I now think twice about spending one-on-one time with a young female colleague.” Similarly, former Vice President Mike Pence famously refused to dine alone with any woman other than his wife in what was deemed “the Pence Rule,” which many pointed out can be damaging to women’s employment opportunities. These anecdotes are just a few examples of an alarming pattern.

A 2019 study conducted by researchers at the University of Houston revealed how well MGTOW beliefs were permeating workplaces around the country in the wake of #MeToo. Of the male respondents, 27% reported they avoid one-on-one meetings with female co-workers. Additionally, 21% of men reported they were reluctant to hire a woman for a job requiring close interaction, and 19% were reluctant to hire an attractive woman.

Another 2019 survey, “Working Relationships in the #MeToo Era,” conducted by Lean In, found more than half (60%) of men in management positions reported they felt uncomfortable working with a woman, a 32% jump from the previous year. Additionally, the survey found 36% of men avoided mentoring or socializing with a woman because they were nervous about how it would look.<sup>151</sup>

Whichever specific group male supremacists identify with they generally hold the same dangerous misogynistic beliefs that women are stupid, manipulative, and genetically inferior. Many reduce women to their reproductive function – simultaneously shaming women for having sex while believing that sex is something women owe men. “Male supremacists believe they are the victims of an oppressive feminist system that has unjustly deprived them of their rightful place in society.”<sup>152</sup>

Regardless of their path or affiliation, male supremacists have been identified as a hate group and a serious threat by a number of extremism watchdog groups including the SPLC, the Global Project

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<sup>149</sup> *Men going their own way (MGTOW)* Southern Poverty Law Center, accessed at <https://www.splcenter.org/resources/extremist-files/mgtow/>

<sup>150</sup> Manoel Horta Ribeiro, Jeremy Blackburn, Barry Bradlyn, and Emiliano De Cristofaro, *The Evolution of the Manosphere Across the Web* (Jan. 2020) accessed at <https://www.researchgate.net/publication/3387373>  
[24 The Evolution of the Manosphere Across the Web.](https://www.researchgate.net/publication/3387373)

<sup>151</sup> *Men going their own way (MGTOW)* Southern Poverty Law Center, accessed at <https://www.splcenter.org/resources/extremist-files/mgtow/>

<sup>152</sup> *Male Supremacy*, Southern Poverty Law Center, accessed at <https://www.splcenter.org/resources/extremist-files/male-supremacy/>

Against Hate and Extremism, the Anti-Defamation League, the National Consortium for the Study of Terrorism and Responses to Terrorism, and The Counterterrorism Group.

## **X. RECENT INCREASE IN ONLINE MISOGYNY AND SEXUAL VIOLENCE**

Organizations monitoring online activity have recently issued warnings related to the significant increase in misogynistic activity online and growing threats of GBV from extremist groups since the November 2024 Presidential election in the United States. According to the Counterterrorism Group:

The surge in online misogyny after November 6 includes a 663% increase in X's posts advocating for the repeal of the 19th Amendment, legally guaranteeing the right to vote to women, highlighting the digital backlash against women following the elections. Misogynist slurs directed at Vice President Harris and other Democrat women received more than 64,000 mentions on X, coming from more than 42,000 accounts on Election Day. On November 6, 2024, Fuentes tweeted "Your body, my choice. Forever." with the comment receiving 95.4 million views as of November 14, 2024. Between November 4 and 6, the use of derogatory language towards women on X increased drastically, with a 4600% increase in the mention of "your body, my choice" and "get back to the kitchen." The Groyper movement, supported by X accounts affiliated with Nick Fuentes, is highlighted due to its strategic use of internet meme culture to propagate extreme far-right ideologies. These accounts disseminate content that both overtly and covertly incites violence, exemplified by X with sexually suggestive memes portraying the Pepe frog character sexually assaulting women. Other Groyper accounts claimed that a "RAPE SQUAD" was "REPORTING FOR DUTY", with a picture of German Schutzstaffel Paramilitary soldiers and a reference to "88," which is used as a substitute for "heil Hitler" in far-right social media spaces.<sup>153</sup>

Research from the Global Project Against Hate and Extremism (GPAHE) found that violent misogyny is thriving in a new way on 4chan message boards since the election, with commenters calling for the formation of rape squads and invoking the dystopian book and television series *The Handmaid's Tale*, "which depicts a horribly misogynistic future in which women are dehumanized and threatened."<sup>154</sup> According to their analysis:

Following the election of Trump on November 5, worrying indications of growing hate and bigotry in online spaces became apparent. With male supremacy and "incel" (i.e., involuntary celibate, a misogynistic ideology which has inspired numerous mass casualty attacks) culture becoming mainstream, misogyny, which has long been a part of the fabric of society, frequently showing up in mainstream pop culture and politics, is quickly escalating into the glorification of violence against women and the celebration of the possibility of women's rights being stripped away.

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<sup>153</sup> Alice Cian, et al. *ASSESSMENT: RISE IN MISOGYNISTIC RHETORIC ONLINE INCREASES THREAT OF GENDER-BASED VIOLENCE FROM EXTREMIST ACTORS; LAW ENFORCEMENT AND WOMEN SHOULD REMAIN VIGILANT FOR POTENTIAL THREATS* The Counter Terrorism Group (Dec. 3, 2024) accessed at <https://www.counterterrorismgroup.com/post/violent-intent-assessment-rise-in-misogynistic-rhetoric-online-increases-threat-of-gender-based-vio>

<sup>154</sup> *New Forms Of Online Misogyny Threaten Violence Against Women*, Global Project Against Hate and Extremism (Nov. 14, 2024) accessed at <https://globalextrmism.org/post/new-forms-of-online-misogyny/>.

GAPHE has uncovered numerous violent misogynistic trends, which are gaining traction on fringe platforms like 4chan and spreading on platforms popular with far-right extremists, such as Twitter and Telegram, since the election. Misogynistic rhetoric ramped up on 4chan from the end of September 2024 through November 5, Election Day, when instances reached a year-high of 1,278 posts, and remained high in the week after the election.<sup>155</sup>



User "FACELESS" posts merchandise targeting women's reproductive rights and "rape squad." (Source: Twitter)

## XI. WHERE DO WE GO FROM HERE?

*From restrictive masculinity to expansive masculinities.* Commonly, toxic masculinity is the term that is used to describe a subset of men who have embraced a rigid set of rules defining what it means to be "a man." Those rules include suffering physical and emotional pain in silence; not depending on anyone; always wanting to win; never seeking comfort or tenderness; and only showing bravery and anger. Any other emotions are weaknesses.<sup>156</sup>

Experts working in the field of healthy manhood generally use the terms "restrictive masculinity or the "man box" to describe the struggles men face and the danger these struggles pose to not only women and girls, but also to men and boys. The rigid construct of cultural ideas about male identity, communicated by parents, family members, the media, peers, and other members of society, places tremendous pressure on men to be a certain way, leaving little room for deviation.

According to these experts, society needs to embrace a vision of expansive masculinity that includes a broader range of attributes that boys and men can display. Specifically, they call for masculinity to

<sup>155</sup> *Ibid.*

<sup>156</sup> Silva Neves. "What is Toxic Masculinity?" *Psychology Today* (Mar. 12, 2021) accessed at <https://www.psychologytoday.com/us/blog/talking-sex-and-relationships/202103/what-is-toxic-masculinity?msocid=12b189f33a26640430e49b323bf96536>.



include embracing emotional intelligence, empathy, vulnerability, and self-awareness. Given that so much of life is now lived online, effective strategies for expanding masculinity need to consider ways to counter the manosphere. Equipundo, in their 2024 *Manosphere Rewired*, created an “opportunity map” to create a healthy manosphere. Among their recommendations are the following:

- Enable safer online spaces that have strong content moderation, provide community support, and offer resources that allow men to seek peer-to-peer advice and emotional support, anonymously if necessary.
- Encourage and train influencers to reflect positive and expansive images of masculinity. Influencers have the ability to reach and impact the behavior of huge audiences.
- Encourage connections between men by leveraging spaces where men like to gather to compete, strategize, and work together toward a shared goal, creating opportunities to build friendships.
- Partner with online spaces where young men are already testing dating and social skills with virtual girlfriends. Offer guides and experiences that help men practice relationship-building, dating, and sex in a risk-free environment.<sup>157</sup>

Whatever the strategies and approach, experts working in the field are sounding the alarm. The outmoded notion that boys must suppress their emotions, conceal their weaknesses, and assert dominance is a damaging message that impairs their ability build healthy relationships. “In most cases, these messages will make it difficult for these men to have a good relationship with their partners. But in the worst of cases, it can transform into rage and, unfortunately, murder.”<sup>158</sup>

***Calls for Section 230 reform.*** In 2018, Congress took action to address some of the shocking injustices Section 230 has protected. After Backpage.com was able to shield itself from several lawsuits brought by young sex trafficking victims,<sup>159</sup> Congress amended Section 230 to create an exemption for knowing facilitation of sex trafficking.<sup>160</sup> A Senate investigation had revealed that “Backpage regularly edited ads to remove keywords that would identify them as objectionable or illegal, rather than removing them outright – so ads with words like ‘teenage,’ ‘rape,’ and ‘little girl,’ would still be published, just with those words removed.”<sup>161</sup> However, the high bar set for proving a platform has actual knowledge of the harm has made the exemption difficult to enforce.<sup>162</sup> As a result, the CDA – which was intended to protect children from online harms – continues to insulate from liability “social networks that have served as hunting grounds for child predation.”<sup>163</sup>

Proponents of Section 230 argue that it has been crucial to the development of the modern internet. Free from the specter of liability, search engines could link to any website, social media companies could welcome anyone, and online forums could allow any type of discourse.<sup>164</sup> But as described above, Section 230 routinely shields defamation, privacy invasions, and sexual depredations. Section

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<sup>157</sup> Brito, P., Hayes, C., Lehrer, R., & Mahler, J., Salinas Groppo, J. *The Manosphere, Rewired: Understanding Masculinities Online & Pathways for Healthy Connection*. Equipundo. (2024) accessed at <https://www.equipundo.org/resources/manosphere-rewired/>.

<sup>158</sup> Silva Neves. “What is Toxic Masculinity?” *Psychology Today* (Mar. 12, 2021) accessed at <https://www.psychologytoday.com/us/blog/talking-sex-and-relationships/202103/what-is-toxic-masculinity?msocid=12b189f33a26640430e49b323bf96536>.

<sup>159</sup> See e.g. *M.A. v. Vill. Voice Media Holdings* (E.D.Mo. 2011) 809 F.Supp.2d 1041.

<sup>160</sup> Stop Enabling Sex Traffickers Act and the Allow States to Fight Online Sex Trafficking Act (SESTA/FOSTA) legislation package. (See P.L. 115-164, 113 Stat. 1253.)

<sup>161</sup> Quinta Jurecic, “The politics of Section 230 reform: Learning from FOSTA’s mistakes *Brookings* (Mar. 1, 2022) accessed at <https://www.brookings.edu/articles/the-politics-of-section-230-reform-learning-from-fostas-mistakes/>.

<sup>162</sup> See e.g. *M.H. v. Omegle.com, LLC* (M.D.Fla. Jan. 10, 2022, No. 8:21-cv-814-VMC-TGW) 2022 U.S.Dist.LEXIS 4543, at \*13 (dismissing case against Omegle, a social media site that let users talk to strangers, in which an 11-year old girl was connected with a predator who extorted nude images from her).

<sup>163</sup> “How to Fix Section 230,” p. 726.

<sup>164</sup> Michael Rustad & Thomas Koenig, “The Case for a CDA Section 230 Notice-and-Takedown Duty” (2023) 23 Nev.L.J. 533, 536.

230 also enables online criminal activity, such as the sale of fentanyl and other illicit substances, identity theft, misinformation, incitement to violence, and recruitment of organized crime and terrorists.<sup>165</sup> By externalizing these costs onto users, digital platforms enjoy what Harvard Law Professor Rebecca Tushnet has termed “power without responsibility.”<sup>166</sup>

This sweeping grant of immunity stands in contrast to the European Union’s Digital Services Act, which requires platforms to implement notice-and-takedown requirements in exchange for liability protections.<sup>167</sup> It also stands in contrast with the obligations imposed on offline actors, placing them at a competitive disadvantage relative to their online counterparts. It impacts the enforcement of laws abroad,<sup>168</sup> and has stunted the development of the law in the US, depriving courts of their traditional role of developing and shaping remedies tailored to novel problems.

Section 230 has also kept the public in the dark about the safety practices of platforms. As Catholic University Law Professor Mary Graw Leary recently testified before Congress, most Section 230 cases are dismissed at the pleading stage, before evidence can be discovered by plaintiffs. As a result, many of the harmful practices of some online platforms have been discovered only through Congressional investigations – such as the Backpage investigation – and through the revelations of whistleblowers.<sup>169</sup> Facebook whistleblower Frances Haugen, who testified before Congress that she believed the platform prioritized profit over the wellbeing and safety of users, specifically recommended reforming Section 230.<sup>170</sup>

Nearly three decades into its existence, Section 230 has been consistently applied in a manner that shields companies, some of which are the most profitable in history, that knowingly or recklessly aid abusers and cause victims harm. The free market has not fixed this problem. While some cases have created cracks in the Section 230 shield,<sup>171</sup> and numerous judges including Justice Clarence Thomas have questioned its broad application,<sup>172</sup> the Supreme Court has declined several opportunities to impose limits on Section 230.<sup>173</sup> Consequently, a growing, bipartisan chorus – including Presidents Biden and Trump,<sup>174</sup> the National Association of Attorneys General,<sup>175</sup> and several Members of

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<sup>165</sup> *Id.* at pp. 536-7.

<sup>166</sup> See Rebecca Tushnet, “Power Without Responsibility: Intermediaries and the First Amendment” (2008) 76 *Geo. Wash. L. Rev.* 986.

<sup>167</sup> “How to Fix Section 230,” p. 733.

<sup>168</sup> *Id.* at p. 730 (“The United States exported §230 to Canada and Mexico through the United States-Mexico-Canada Trade Agreement, which went into effect on July 1, 2020”).

<sup>169</sup> Witness testimony of Prof. Mary Graw Leary, “Children’s Safety in the Digital Era: Strengthening Protections and Addressing Legal Gaps” (Feb. 19, 2025) Hearing of the U.S. Senate Committee on the Judiciary, [accessed at https://www.judiciary.senate.gov/committee-activity/hearings/childrens-safety-in-the-digital-era-strengthening-protections-and-addressing-legal-gaps](https://www.judiciary.senate.gov/committee-activity/hearings/childrens-safety-in-the-digital-era-strengthening-protections-and-addressing-legal-gaps).

<sup>170</sup> Pietsch, et al., “The Facebook whistleblower told Congress it should amend Section 230, the internet law hated by both Biden and Trump. Here’s how the law works” *Business Insider*, (2021) [accessed at https://www.businessinsider.com/what-is-section-230-internet-law-communications-decency-act-explained-2020-5](https://www.businessinsider.com/what-is-section-230-internet-law-communications-decency-act-explained-2020-5).

<sup>171</sup> See e.g., *Fair Hous. Council v. Roommates.com, LLC* (9th Cir. 2008) 521 F.3d 1157, 1168 (liability arose from website’s material contribution to discriminatory content); *Barnes v. Yahoo!, Inc.* (9th Cir. 2009) 570 F.3d 1096, 1107 (liability arose from promise and subsequent failure to remove offending content); *Anderson v. TikTok Inc.* (3d Cir. 2024) 116 F.4th 180, 184 (recommendation algorithm was platform’s first-party expressive content and thus is not protected by Section 230).

<sup>172</sup> *Doe ex rel. Roe v. Snap, Inc.* (2024) 144 S. Ct. 2493, 2494 (Thomas, J., dissenting from denial of certiorari) (stating “make no mistake about it—there is danger in delay. Social-media platforms have increasingly used §230 as a get-out-of-jail free card”).

<sup>173</sup> See *Gonzalez v. Google LLC* (2023) 598 U. S. 617, 621 (declining to address claims Google had violated the Antiterrorism Act by recommending ISIS to YouTube users).

<sup>174</sup> Pietsch et al., “The Facebook whistleblower told Congress it should amend Section 230, the internet law hated by both Biden and Trump. Here’s how the law works,” *Business Insider* (2021) [accessed at https://www.businessinsider.com/what-is-section-230-internet-law-communications-decency-act-explained-2020-5](https://www.businessinsider.com/what-is-section-230-internet-law-communications-decency-act-explained-2020-5).

<sup>175</sup> John Lucas, “AG Moody Joins with Other Attorneys General to Urge Congress to Stop Protecting Illegal Activity on the Net” *Capitolist* (May 23, 2019) [accessed at https://thecapitolist.com/ag-moody-joins-with-other-attorneys-general-to-urge-congress-to-stop-protecting-illegal-activity-on-the-net](https://thecapitolist.com/ag-moody-joins-with-other-attorneys-general-to-urge-congress-to-stop-protecting-illegal-activity-on-the-net).

Congress<sup>176</sup> – has called for Section 230 reform. According to Santa Clara University School of Law Professor Eric Goldman, a staunch proponent of Section 230, “there is almost no member of Congress who would vote against a Section 230 repeal, Democrat or Republican.”<sup>177</sup> As litigator Carrie Goldberg writes:

Most industries would also like to be free from liability for harms their product, services or staff could cause their customers. But the reality is, legal responsibility for one’s products and services is the cost of doing business and drives safety innovation. Other business owners purchase liability insurance and—for the sake of reputation, low insurance premiums and morality—run businesses that don’t harm customers or the general public.

All in all, Section 230 is a government subsidy to the industry least in need and least deserving of it. It’s time to fix 230—and if the Supreme Court won’t do it, legislators must act.<sup>178</sup>

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<sup>176</sup> “Section 230 Legislation tracker” *Lawfare* (updated Sep. 19, 2023) accessed at <https://www.lawfaremedia.org/projects-series/section-230-tracker>.

<sup>177</sup> Eric Goldman, “2024 Internet Law Year-in-Review” (Jan. 9, 2025) accessed at <https://blog.ericgoldman.org/archives/2025/01/2024-internet-law-year-in-review.htm>.

<sup>178</sup> “*Herrick v. Grindr*: Why Section 230 of the Communications Decency Act Must be Fixed” *Lawfare*, (Aug. 14, 2019) accessed at <https://www.lawfaremedia.org/article/herrick-v-grindr-why-section-230-communications-decency-act-must-be-fixed>.