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INTRODUCTION

From the chambers of the United Nations to the boardrooms of Silicon Valley, 2019 was the year in which the world finally began to listen and respond to Prostasia Foundation’s message.

Although our programs and issue areas are diverse, at its core that message is a simple one: that child sexual abuse (CSA) is wrong not primarily because it is immoral, but because it is harmful. It creates many harms that are unique to each victim, but also one specific harm that they all share: the violation of their consent, which is an infringement of their human right to bodily autonomy.

When we focus on CSA as being harmful rather than as being sexually immoral, it becomes clearer that it must be addressed first and foremost as a public health issue, using evidence-based interventions that respect the human rights of all, rather than through moral condemnation.

Although there is a place for moral condemnation also, experience shows us the limits—and the risks—of focusing on the moral depravity of those who commit CSA.

Doing so creates and sustains a sexual stigma that spreads like a stain, and hurts those who are not morally culpable. People from other, already-stigmatized and marginalized communities bear the brunt of this stigma, and that’s not because they have any tolerance for child sexual abuse.

Now, there’s one such organization that stands up for them. Unfortunately, it’s the only one that does so—it’s us. And that has put us at odds with some of the giants who came before us. Organizations that supported the law FOSTA, for example. And those who stoked the “Satanic sex panic” while other experts were urging caution. Those who supported the Australian police in running a child sexual abuse website for eleven months. And those who stand behind the arrest of a 17 year old artist from Costa Rica who uploaded cartoons to her blog.

Our voice of reason may be a lonely one, at times. It can be unpopular and even dangerous. Which is why we are so proud of each and every one of our team members for putting themselves on the line by committing themselves to our mission. And so proud of our network of grassroots donors for supporting a new, evidence-based, human-rights focused and sex positive approach to child protection.

We are committed to taking the approach that we know to be right. Read through this annual report and decide whether you agree. If you do, we welcome you to join us as a member or donor. Please be in touch to partner with us in 2020.
We help to fund sound scientific research that aids in CSA prevention

Primary prevention is an approach that views the harms of child sexual abuse as a public health problem, that can be addressed through interventions that are evidence-based. Since such interventions must be supported by research, part of Prostasia Foundation’s mission is to raise awareness of the importance of such research, and in the longer term to facilitate it by creating connections between researchers, funders, and policymakers.

Research into sexual outlets

Although there are many areas of primary prevention in which research is sorely needed, our focus in 2019 was on the promotion of research to address the assumptions that underlie laws and policies that censor and in some cases criminalize fiction, artwork, devices, and consensual sexual practices, that are said to represent minors in a sexual context.

Examples of such laws and policies that we encountered during 2019 include a rash of bans on "childlike" sex dolls, and Reddit’s crackdown on cartoon pornography and ageplay. The underlying assumption is that these can encourage acts of sexual abuse against real minors. However experts on our Advisory Council have contested that the bans could have the opposite effect, by eliminating outlets for sexual interests that may actually prevent some people from offending.

Ultimately this is a question that research can answer. The fact that we are the only child protection organization interested in answering it suggests that bans on sexual outlets may be motivated more by morality than harm prevention. During 2019 we raised almost $2,000 from 18 separate donors to support the first phase of a proposed research project into this important question. Research is expensive, and we will need to continue to raise more in order to commence this project.

Google search ads

In 2019 Prostasia continued and expanded our “CP” campaign, in which we use Google search ads to deter people who may have been searching for links to illegal sexual images of minors on the dark web. However because we were offering a non-judgmental message of education and awareness.

The ads are designed to serve three main purposes. The first is to alert people to the fact that their online habits are being monitored. Second, for those who were indeed intending to access abuse images, we hope to dissuade them and to divert them towards our work and invite them to contribute towards supporting it.

Analytics suggest that this strategy is working. During 2019 our ads received 268,934 impressions and achieved our stated objectives. During 2019 we doubled the number of individual search ads that we are running, and set up a new line...
Safewords and Red Lines

The consensual kink or BDSM community provides a consent-based framework and support system for people whose sexual interests include practices, personas, and fantasies that diverge from mainstream (or “vanilla”) sexual norms. Because some of these practices present physical and emotional risks to participants, the role of the community and its leaders in promoting best practices through education, training, and mentorship is essential to ensure that activities do not stray outside of the realms of consent and fantasy, to become abusive or illegal.

Prostasia Foundation is a sex-positive organization that includes BDSM practitioners in leadership, and is an affiliate member of the National Coalition for Sexual Freedom (NCSF). We believe that the best practices that the BDSM community has developed around communication and consent, and its firm policy of excluding minors, makes it well suited as an ally in our mission of primary prevention. However the stigma and censorship that the BDSM community itself faces has impeded its message from being heard as widely as it deserves to be.

During 2019, we held a series of three successful events, including two online webinars and a face-to-face workshop, to help to counter this stigma and to introduce the BDSM community’s allyship to a wider audience. Among the topics covered in the events were how to prevent minors from becoming involved in the community while still supporting them with information, how certain BDSM dynamics may have therapeutic applications for survivors of child sexual abuse, and the varied motivations that draw participants to engage in ageplay (a form of BDSM roleplay in which at one adult participant typically plays a childlike role).
CAMPAIGNING
FOR EFFECTIVE LAWS

We address the human rights impacts of child protection laws and policies. Politicians have a greater incentive to address public sentiment around child sexual abuse than they do to address the abuse itself. They also tread on eggshells around the topic, knowing that taking a nuanced position on abuse prevention is so easily misrepresented as being weak on sexual crime. These facts have created a dynamic in which lawmakers will often claim to be acting to prevent abuse, when in fact all they are doing is perpetuating the public’s existing hatred and fear of a stigmatized minority group.

FOSTA

The archetypal example of this is the U.S. law FOSTA (Allow States and Victims to Fight Online Sex Trafficking Act), that was originally introduced to combat child sex trafficking, but which was ill-adapted to do anything of the sort. Instead, by making Internet platforms responsible when their users post content that could be construed as promoting or facilitating sex work, platforms have increasingly taken the safest course of action for them: shutting down all speech about sex.

Fulfilling one of the commitments that we made at our launch, we joined with ten other community groups this February in filing an amicus curiae (friend of the court) brief in the only pending lawsuit to have FOSTA declared unconstitutional. The lawsuit was brought by plaintiffs including the Woodhull Freedom Foundation and Human Rights Watch, and the other supporting amici include the National Coalition for Sexual Freedom, the Free Speech Coalition, Decriminalize Sex Work, and the New York Transgender Advocacy Group—all of which have had their speech and their work threatened by this law.

The case in which our brief was submitted was an appeal from the dismissal of the plaintiffs’ original claim, and was heard in the United States Court of Appeals for the D.C. Circuit in September 2019. Our section of the brief focused on evidence that the clampdown of speech about sex that followed FOSTA has reduced the availability of online child sexual abuse prevention materials, such as blogs and support groups. No judgment has yet been rendered in the case.
Sex doll laws

It’s difficult to imagine a less sympathetic subject than sex or love dolls—objects that popular culture treats as the butt of a joke, at best. But perhaps that’s why Prostasia Foundation remains the only organization sounding the alarm about the repercussions of blanket bans on these objects, which we regard as a government power-grab that impacts both the private sex lives of citizens, and the research and clinical uses of these devices.

In 2019 we expanded our campaign against sex doll bans by writing to lawmakers in the United States and Australia, and initiating five new campaigns against state and federal laws. Highlighting their possible usage in CSA prevention, we urged policymakers to hold off on regulating these objects until more is known about their effects. We also uncovered the use of these devices by caregivers and educators in managing inappropriate sexual behavior by students with special needs. Despite these interventions, a nationwide ban in Australia and state bans in Florida and Kentucky were passed during 2019.

In November 2019, Prostasia Executive Director Jeremy Malcolm and Advisory Council member Craig Harper spoke at the annual conference of the Association for the Treatment of Sexual Abusers (ATSA), at a workshop titled “Exploring and Understanding the Experiences of People Who Own Sex Dolls: Toward an Evidence-Based, Sex Positive Approach.” Dr Harper presented the initial results of research he is conducting with colleagues at Nottingham Trent University, which suggest that ownership of a sex doll has no correlation with a propensity to commit sexual abuse.
Other laws and submissions

Prostasia Foundation doesn’t merely fight back against bad laws, but also supports bills that we consider are evidence-based and make a positive contribution to abuse prevention. Although none of these bills passed into law during 2019, our analysis and advocacy work during the year has established the groundwork to support these bills again when they are reintroduced into a subsequent legislative session.

In the United States, we supported laws both at a federal and state level. The Real Education for Healthy Youth Act (REHYA) and The Youth Access to Sexual Health Services Act (YASHS) are a pair of federal laws that will guarantee funding for comprehensive and inclusive sexuality education and other sexual health services. In California, we supported SB 145, to end a form of discrimination against young LGBTQ+ people in the criminal justice system. We also engaged with the Florida House of Representatives Criminal Justice committee on that state’s sex offender registry policy, encouraging an evidence-based approach.

We also aim to address some of the most pressing developments from outside the United States. During 2019, our focus was on key developments in the United Kingdom. In our submission on the UK Government’s Online Harms White Paper, which is expected to result in a new “duty of care” being imposed upon Internet platforms, we recommended that any new online regulator must have a responsibility to uphold human rights. In our joint submission with freedom of expression organization Article 19 about a new Internet security standard called DNS over HTTPS, we explained why this technology supports our goal of protecting children from abuse.
DEFENDING THE INNOCENT

We engage in dialogue with diverse stakeholders whose voices are not normally heard. When we talk about defending the innocent, there are none more innocent than children themselves. Protecting them from harm includes both preventing them from being abused, and also protecting them from harms that our society does to them in their name, such as by criminalizing them over age-appropriate relationships with peers. But other innocent people are also unjustly harmed in the name of protecting children, and we defend them also. One of the unique ways that we do that is by allowing them to tell their stories, and welcoming them as allies in our mission.

Bridge-building events

Our keystone achievement in 2019 was the Multi-Stakeholder Dialogue on Internet Platforms, Sexual Content, & Child Protection (or #SexContentDialogue) that we held on May 23. This unique event brought together Internet companies, experts from the psychological and legal professions, and a diverse group of representatives of stakeholder groups such as Internet reporting hotlines, the payments industry, adult content creators and sex workers. This unique, action-oriented meeting discussed how taking a primary prevention approach to child sexual abuse prevention does not require the blanket censorship of sexual content. By working through a series of case studies, participants brainstormed more nuanced, inclusive, and evidence-informed approaches.

• Although estimates of child sexual abuse are difficult to generate, research indicates that roughly 1 in 5 girls (20%) and 1 in 20 boys (5%) will be victims of sexual abuse in their childhood (see the work of David Finkelhor and the Crimes Against Children Research Center)
Our most successful petition to date, garnering 17,620 signatures, was presented to the United Nations Committee on the Rights of the Child in March 2019 on its proposal that the international definition of “child pornography” should be loosened to include art and fiction. Although we succeeded in improving the recommendation that the Committee eventually adopted, it still put forward the general proposition that “representations of non-existing children or of persons appearing to be children” should be included in bans on child sexual abuse material (child pornography). At an event held in Korea on October 4, we joined with Daniel Mogster from the United Nations Office of the High Commissioner for Human Rights to unpack and critique this recommendation, reaching the conclusion that such blanket restrictions are unlikely to meet the criteria set in international human rights law for legitimate restrictions on freedom of expression.

Prostasia Foundation also held two local movie premieres during 2019, both at Oakland’s New Parkway Cinema. The War on Whores, which we screened on April 9 and which features our Advisory Council member Maggie McNeill, is an independent documentary film that exposes how the war on consensual adult sex work is founded on a false assumption that most sex workers are exploited victims
of pimps and traffickers. Butterfly Kisses, which we screened on August 18, is a daring and challenging film about child sexual abuse and its aftermath, which won the Generation 14plus Crystal Bear for Best Film 2017 at the Berlin International Film Festival (awarded by a youth jury).

Encouraging platform best practices

The key deliverable from our May #SexContentDialogue meeting with Internet platforms, experts, and stakeholders was a draft set of Best Practice Principles for Sexual Content Moderation and Child Protection. Among the principles are that direct harm to children should be the basis for restricting sexual content, and that decisions about content moderation should be made transparently, with input from all affected stakeholders. We continued to develop the principles in a multi-stakeholder online process, and presented them as a work in progress at RightsCon in Tunis on June 13. The final #SexContentDialogue Principles were launched at the Internet Governance Forum in Berlin on November 26.

We immediately set about applying the #SexContentDialogue principles by developing a program for publishers, websites, event organizers, and product vendors, that would allow them to publicly attest that they are allies in the fight against child sexual abuse, and that they have taken reasonable steps to avoid harming children. This became our No Children Harmed certification program, which was soft-launched in Korea on October 4. We are currently operating the program as a small-scale pilot among early adopters, which will be followed by a full evaluation ahead of a decision being made about a full launch.

Throughout the year, we also actively engaged with Internet platforms and intermediaries. Among the highlights of this engagement included were our cooperation with Microsoft, DuckDuckGo, and Yandex to have a notorious portal to clearweb child abuse websites delisted from their search indexes in March. With less immediate success, we attempted to assist Facebook in more drawing a more accurate line between child abuse material (such as sexualized pro-child spanking groups) and legitimate content (such as the hashtag #DDLG, which it banned following a stigmatizing newspaper campaign against adult ageplayers). In October, we also joined with over a hundred other groups to commend Facebook for upholding its users’ right to end-to-end encryption of their communications.
Communication and outreach

All the research, consultation, and policy analysis that we do would be for nothing if we did not effectively communicate it to policymakers, platforms, and the public through a variety of channels. During 2019 we surpassed our goal of reaching 2000 followers on our Twitter account, which represents a fourfold increase in our follower count over the course of the year. We also maintain an active social media presence on Facebook, LinkedIn, and Instagram. In addition, we also continued to release our monthly newsletter which ended the year with 6,749 subscribers.

A new addition to our services in 2019 was our monthly podcast/vodcast series, Sex, Human Rights, and CSA Prevention, which is available on YouTube and on all major podcast streaming platforms. The most popular episodes were interviews with Dr James Cantor about rational approaches towards pedophilia and prevention, with Maggie McNeill about sex workers as allies against child sexual abuse, with Jillian Keenan about spanking fetishism and child battery, and with Jillian York about the line between art and child sexual exploitation.

Our blog also continues to go from strength to strength. During 2019 we published 27 articles from a diverse panel of contributors. Our three most popular articles during the year were on the United Nations proposal to loosen the definition of “child pornography,” about “purity policing” within fandom communities, and about ageplay, an adults-only form of roleplay practiced within the BDSM community. Sheila van den Heuvel-Collins joined our team as our blog editor in August 2019.
OUR TEAM
BOARD OF DIRECTORS

Jeremy Malcolm
Executive Director
Jeremy is a lawyer, human rights activist, and father of two boys. Prior to his work at Prostasia he held the position of Senior Global Policy Analyst at the Electronic Frontier Foundation.

Cathy Gellis
Director
Cathy is a lawyer with a practice focused on intellectual property, free speech, intermediary liability, privacy, and other innovation policy matters affecting technology use and development.

Pearl Regalado
Secretary
Pearl is a fashion designer, visual artist, and entrepreneur. She has first hand experience in communities of CSA survivors, sex workers, and kink practitioners.
STAFF

Meagan Ingerman
Program Manager

Meagan is a childcare and child development specialist with over ten years as a provider, tutor, and consultant. She also volunteers with the organized kink community.

Sheila van den Heuvel-Collins
Blog Editor (August 2019 - January 2020)

Sheila is a writer, freelance editor and English tutor in the Toronto area, with an interest in psychology. Her books are collections of short fiction with themes of sexuality.

Note: due to a serious incident of harassment of a staff member that occurred in 2019, we now offer staff the opportunity not to have their names or photographs listed publicly. A full team listing is available for public inspection by appointment.
ADVISORY COUNCIL

Craig Harper
Craig is a Lecturer in Human Psychology, and based at Nottingham Trent University. The bulk of his work has examined public attitudes within a forensic context, particularly in relation to sexual crime.

Gilian Tenbergen
Gilian is currently a Visiting Assistant Professor of Psychology with SUNY Oswego, specializing in the neurobiology of pedophilia and its translation into the prevention of child sexual abuse.

Ian O’Brien
Ian is a Senior Director of Programs and Operations at the Free Speech Coalition. O’Brien attended graduate school at Columbia University’s prestigious Mailman School of Public Health.

Maggie McNeill
Maggie is a childcare and child development specialist with over ten years as a provider, tutor, and consultant. She also volunteers with the organized kink community.

James Cantor
James is a clinical psychologist and neuroscientist, internationally recognized for his research on the causes of pedophilia over the past 20 years. Dr. Cantor is the Director of the Toronto Sexuality Centre.
Nerea Vega Lucio

Nerea's thesis for her bachelor of medicine was on the topic of CSA prevention, non-offending pedophiles, and the use of social networks as therapeutic tools.

Guy Hamilton-Smith

Guy is a graduate of the University of Kentucky College of Law and is the Sex Offense Litigation and Policy fellow at the Mitchell Hamline School of Law.

Kyung Sin Park

“KS” Park is a professor at the Korea University School of Law, and co-founder and Executive Director of www.opennetkorea.org.

Honey Sampson

Honey is a social media influencer, a cam model, and an activist for sex and body positivity, sex worker rights, and sexual abuse prevention.

Note: There are also three other standing members of our Advisory Council who do not currently have a public profile. A full team listing is available for public inspection by appointment.
Prostasia Foundation had a very strong year financially, raising over $15,000 in revenue and ending the year with zero debt. At the close of the 2019 year, Prostasia Foundation remains in a solid financial position.

Compared with our first part-year 2018, which included a three-month crowdfunding campaign, our one-off donation revenue increased threefold. All of this represents growth in our base of grassroots supporters.

Despite productive conversations with several major donors during the year, we are yet to secure financial support from the philanthropic sector or from large corporate donors. Addressing this by diversifying our sources of funding will become a priority for Prostasia Foundation in 2020.
### Revenue / income

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### Net worth

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### Account balances

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### Challenges

In July 2019, PayPal terminated our merchant account without warning, for unspecified breaches of its User Agreement. Until then, PayPal had been offered as a payment option for our donors and members. Despite appealing the termination to PayPal’s Executive Office, we never learned which provision of its User Agreement we were alleged to have infringed. In cooperation with free speech group Article 19, a complaint about PayPal’s actions against Prostasia has been referred to the UN Special Rapporteurs on the promotion and protection of the right to freedom of opinion and expression, and on the rights to freedom of peaceful assembly and of association.

Our largest budget expenditures during 2019 were on our events, and in particular our May #SexContentDialogue, which required us to pay travel expenses for several presenters. Although originally planned to break even, it was more difficult than expected to secure paid registrations, and like several of our other events, it ended up running at a deficit.

Our financial goals in 2020 are to raise $100,000 in grants from major donors, $10,000 in corporate donations, and $1,000 in recurring donations.
2019
BY THE NUMBERS

17,000+
Signatories to Our Most Popular Petition

Events in 10 out of 12 Months

2000+
Twitter Followers

6000+
Views on YouTube

6000+
Newsletter Subscribers

250,000+
Impressions of Our Prevention Ads
[A] primary prevention approach that respects human rights and the diversity of human sexuality doesn't have to be incompatible with protecting children—indeed, that it is the only approach that we can take to tackling this problem without causing widespread harms.”

- from our July 2019 newsletter
“Why do I do this? Because it's the right thing to do. Because one of the worldviews I live by is I want to do the right thing, not the easy thing.”

Dr Gilian Tenbergen,
Advisory Council member