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17 **UNITED STATES DISTRICT COURT**
18 **SOUTHERN DISTRICT OF CALIFORNIA**

19 L.W., *minor child through her legal*
20 *guardian Jane Doe; C.A., minor child*
21 *through her legal guardian John Doe;*
22 *and C.O., minor child through her legal*
23 *guardian John Doe II on behalf of*
24 *themselves and all others similarly*
25 *situated,*

26 *Plaintiff,*

27 v.

28 SNAP INC., APPLE INC., and
29 GOOGLE LLC,

30 *Defendants.*

Civil Action No.:
3:22-cv-0619-LAB-DDL

AMENDED COMPLAINT
[CLASS ACTION]

DEMAND FOR JURY TRIAL

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1 Snapchat, by design, allows for any adult predator – even those who have a criminal
2 record history or sexual offense against children – to freely make an account and be paired
3 as “friends” on the Snapchat platform. This makes it inherently dangerous *by design*. Even
4 before an innocent minor begins to talk to these strangers, the system on Snapchat’s product
5 is set up so that multiple “burner accounts” or disposable accounts can be made by the
6 same person without regard to their age or history or child sexual offense criminal record.
7 Even before any messaging occurs, the adult perpetrators know to “quick add” young
8 children by looking at recommended profiles of children. Even before messaging happens,
9 the design of the platform is set up so that (1) messages and contents disappear by default,
10 which conveniently evades supervision by legal guardians or law enforcement, (2) no
11 warnings are in place regarding sexual crimes on the app, (3) representations about photo
12 and video scanning for law enforcement reporting are known to be ineffective and false.

13 Apple and Google, the stores that knowingly sell the defectively designed products
14 like Snapchat and Chitter apps, are primary actors in the supply chain of the online
15 ecosystem that fuels criminal activity. Apple and Google’s app stores, Apple App Store
16 and Google Play Store, take a percentage of sales and revenue from the apps that are
17 downloaded and used by troves of iPhone and Android phone users. Perpetrators of the
18 child sex crimes download the apps on one of these two app stores to commit harms to
19 children. These stores also promote harmful apps using their own recommendation
20 algorithms to the consumers including perpetrators. Ignoring customer reviews that report
21 child sexual abuse on the app stores’ web pages, Apple and Google’s app stores continue
22 to recommend, promote, and lure perpetrators of child sexual crimes to download these
23 dangerous apps, and consistently make profit from them.

24 We must now narrate how this has caused tragic harms to three Plaintiffs all of whom
25 are young children. Plaintiff L.W., through her legal guardian Jane Doe and counsel
26
27
28

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