

FILED FOR RECORD
2020 SEP 23 A 9:34

IN THE 1A DISTRICT COURT OF TYLER COUNTY
STATE OF TEXAS

CITY OF TYLER, TEXAS
CLERK OF DISTRICT COURT
TYLER, TEXAS
COPY

THE STATE OF TEXAS
VS.
NETFLIX, INC.
100 WINCHESTER CIRCLE
LOS GATOS, CA 95032, USA

§
§ CAUSE NO. 13731
§ BOND N/A
D&W

CHARGE: PROMOTION OF LEWD VISUAL MATERIAL DEPICTING CHILD
PC 43.262

INDICTMENT

IN THE NAME AND BY AUTHORITY OF THE STATE OF TEXAS:

THE GRAND JURY for Tyler County, Texas duly selected, impaneled, sworn, charged, and organized as such at the JANUARY term A.D. 2020 of the 1 A District Court for said County, upon their oaths present in and to said court at said term that NETFLIX, INC, hereinafter styled Defendant, on or about the 15TH day of SEPTEMBER A.D. 2020, and before the presentment of this indictment, in the County and State aforesaid, DID THEN AND THERE

knowingly promote visual material which depicts the lewd exhibition of the genitals or pubic area of a clothed or partially clothed child who was younger than 18 years of age at the time the visual material was created, which appeals to the prurient interest in sex, and has no serious literary, artistic, political, or scientific value, to wit: by issuing or selling or providing or delivering or distributing or disseminating or transmitting or publishing or exhibiting or presenting or advertising the film titled Cuties, also known as Mignonnes, or offering or agreeing to issue, sell, provide, deliver, distribute, disseminate, transmit, publish, exhibit, present, or advertise said film, and the promotion of said film was authorized or recklessly tolerated by a high managerial agent of Netflix, Inc., namely, Wilmot Reed Hastings Jr. or Theodore Anthony Sarandos Jr., acting in behalf of Netflix, Inc. and within the scope of the agent's office or employment at Netflix, Inc.

AGAINST THE PEACE AND DIGNITY OF THE STATE.

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