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CAROLYN WEST, PH.D. Professor, Clinical Psychology, University of Washington April 3, 2024

Mr. Matthew Prince Co-Founder and CEO, Cloudflare 101 Townsend St San Francisco, CA 94107

Re: Cloudflare placed on 2024 Dirty Dozen List for facilitating sexual abuse and exploitation by providing services to exploitative enterprises

Dear Mr. Prince:

We are writing to advise that the National Center on Sexual Exploitation—a non-partisan nonprofit organization based in Washington, DC, dedicated to addressing the full spectrum of sexual exploitation—is placing Cloudflare on the annual Dirty Dozen List. The Dirty Dozen List is a campaign that names 12 mainstream contributors to sexual exploitation and abuse and will be publicly released on April 10, 2024.

Cloudflare provides infrastructure to some of the most prolific, well-known sex buyer "review boards" and other prostitution sites (many of which have come under fire for sex trafficking), as well as deepfake pornography tools. By providing content delivery network (CDN), domain name system (DNS), and Web Application Firewall (WAF) services, your company enables illegal and harmful exploitative activities to thrive. Cloudflare is an essential component in keeping these sites operational. In fact, none of them could function at their current scale without Cloudflare.

Some of the sex buyer review boards and prostitution sites Cloudflare provides CDN services for include the following: RubMaps, ¹ Chaturbate, ² TNA Board, ³ The Erotic Review, ⁴ AdultSearch, ⁵ Seeking, ⁶ yesbackpage, ⁷ and OnlyFans. ⁸ Cloudflare provides DNS for the prostitution site Skip the Games. ⁹ Cloudflare also provides CDN services for many prominent deepfake pornography platforms, including Clothoffi.io, ¹⁰ Undress.love, ¹¹ Undress.app, ¹² Nudify.online, ¹³ Deepnude.cc, ¹⁴ and provides DNS services for Undressai.com. ¹⁵ Many of these prostitution sites and deepfake pornography platforms also have WAF services provided through Cloudflare. See full list below.

1201 F St. NW, Suite 200, Washington, DC 20004 | 202.393.7245 | EndSexualExploitation.org | public@ncose.com

Cloudflare can choose to terminate its services to any site that engages in illegal activities or violates its terms of service, which you have done before when facing pressure to cut ties with highly problematic platforms. For example, in April 2018, <u>Cloudflare terminated CDN services for decentralized social media platform Switter</u>, ¹⁶ a platform for prostitution, after the passage of the federal Fight Online Trafficking Act (FOSTA). In August 2019, <u>Cloudflare terminated services for 8chan</u> following multiple mass shootings connected to the online forum. ¹⁷

So why does Cloudflare continue to provide services to known sex buyer review boards and other prostitution sites – including ones known for sex trafficking?

Sex buyer review boards and platforms like OnlyFans and Seeking.com are well known for facilitating prostitution, which is illegal in all but a few U.S. counties in Nevada. Several of them have also been shown through law enforcement investigations and news reports to be hotspots for sex trafficking. Furthermore, review boards normalize sex buying, which is the root cause of sex trafficking. Without male demand for paid sex, sex trafficking would cease to exist. No buyers equals no business. If these boards were forums for discussing other illegal activities, like drug trading or illegal gun sales, they would be shut down immediately.

Cloudflare also facilitates image-based sexual abuse (IBSA) – the capture, creation, and/or sharing of sexually explicit images without the subject's knowledge or consent – by providing services for deepfake pornography platforms that host abusive imagery itself and/or the technology to create abusive imagery, such as tools used to "undress" unsuspecting women and girls. Deepfake websites rely on companies like Cloudflare to provide them with basic web infrastructure. In August 2023, a Bloomberg review found that "13 of the top 20 deepfake websites are currently using web hosting services from Cloudflare Inc. to stay online." By refusing to provide services to these exploitative sites, Cloudflare could play a major role in stemming the tide of image-based sexual abuse.

Cloudflare should not provide infrastructure to sites that are *known* to facilitate sexual abuse and exploitation. Further details are explained below.

<u>Cloudflare Provides Services to Sex Buyer Review Boards and Other Prostitution Sites, including</u> <u>Ones Known for Sex Trafficking</u>

Cloudflare provides CDN (content delivery network) services to some of the most <u>prolific</u>, <u>well-known</u> <u>sex buyer review boards</u> and other prostitution sites: <u>RubMaps</u>, <u>Ohaturbate</u>, <u>TNA Board</u>, <u>The Erotic Review</u>, <u>AdultSearch</u>, <u>AdultSearch</u>, <u>Seeking</u>, <u>Seeking</u>, on the prostitution site <u>Skip the Games</u>. Roudflare also provides <u>Web Application Firewall (WAF)</u> <u>services</u> to the following prostitution sites:

	Advanced Web application firewall detect Web Application Firewall Detection Discover the security protecting your target		
	https://rubmaps.ch/		Start Scan
Raccoon WAF detector	WafW00F detector		
	Done		Some common
Host	lp	WAF Detected	
rubmaps.ch	172.67.153.127	Cloudflare	
chaturbate.com	104.18.101.40	Cloudflare	
tnaboard.com	104.27.206.92	Cloudflare	
theeroticreview.com	104.23.133.2	Cloudflare	
adultsearch.com	172.64.110.6	Cloudflare	
seeking.com	104.19.162.42	Cloudflare	
yesbackpage.com	172.67.71.239	Cloudflare	
skipthegames.com	172.67.20.147	Cloudflare	

By providing services to these sites, Cloudflare facilitates illegal activities and normalizes sex buying. Research has identified "normalized beliefs" about the commercial sex trade as a main driver of sex buying.³⁰

Sex buyers represent <u>consumer-level demand</u> and are the driving force fueling markets for paid sex;³¹ without sex buyer demand, sex trafficking would not exist. Sex buyers inflict serious psychological harm on those they purchase for sex.³² Numerous studies have revealed the violence perpetrated by sex buyers.³³ Read more about why sex buyers must be stopped <u>here</u>.³⁴

This violence is reflected in sex buyer discussions of their activities. Sex buyer review boards, or so-called "hobby boards," operate like a Yelp for prostitution, allowing sex buyers to "review" and rate women whom they have paid for sex. These reviews often show sex buyers' callous disregard for the women from whom they purchase sexual access; many reviews <u>denigrate and objectify prostituted</u> <u>women</u>, with little consideration of whether they might be victims of sex trafficking.³⁵

Review boards have become <u>integral to the U.S. sex trade in recent years</u>, ³⁶ after the <u>seizure of Backpage</u>³⁷ by the Department of Justice and crackdown on Craigslist for facilitating sex trafficking. Rob Spectre, founder of childsafe.ai, a software startup that combats sex trafficking, explained that <u>"hobby boards" have emerged as a greater hub for sex buyers and sex trafficking</u> after those popular sites were taken down, saying, "This is where the entire demand is going to shift. There's never going to be another Backpage. It's never gonna look like that. It's gonna look like this." A <u>2021 Government Accountability Office (GAO) report confirmed that the disruption of the online commercial sex market</u>

caused by the seizure of backpage.com and passage of FOSTA has led to increased use of so-called "hobby" boards and "sugar dating" platforms.³⁹

In June 2020, the prostitution site <u>CityXGuide was seized and shut down by the U.S. Attorney's Office</u> for the Northern District of Texas, ⁴⁰ and its owner was charged with 28 counts including promotion of prostitution and reckless disregard of sex trafficking. Yet Cloudflare continues to provide services to similar sites that facilitate illegal activity.

In June 2022, the Coalition Against Trafficking in Women (CATW) released a report called "From Impunity to Accountability: Deterring Sex Buyers in New York State and Beyond" that analyzed reviews from sex buyer review boards, including BestGFE, RubMaps, USA Sex Guide, and Utopia Guide, in New York state from 2008 to 2022. 41 The beginning of the report contains this trigger warning: "The contents of this document include statements made by sex buyers that include the description of violent, sexist, racist, pornographic, dehumanizing, torturous and degrading acts which can offend or even disturb the reader." The CATW report further explained, "These reviews give us proof that sex buyers are in fact visible and unequivocal in their expressions of dehumanization and commodification of women, in violation of principles of human rights, equality, and respect for the dignity of persons."

A 2020 analysis of sex buyer reviews from Chicago on USA Sex Guide found that sex buyers' self-described identity was "closely associated with maintaining, perpetrating, and minimizing violence against women." A 2018 study that analyzed online sex buyer reviews of legal brothels in Australia found that "sex buyers actively construct and normalize narratives of sexual violation and violence against women... through their language, referencing objectification, unsafe sex practices, and, in more extreme cases, rape to create a sense of community with other [sex buyers]." and minimizing violence against women...

Sites with services from Cloudflare have also been found to facilitate sex trafficking. In January 2024, investigators discovered an online sex trafficking ring in which payments were facilitated through Cash App and sex traffickers posted images/advertised victims on prostitution site "SkiptheGames." Other news articles and law enforcement press releases linking sites with CDN or DNS services provided by Cloudflare to prostitution and sex trafficking include the following:

Rubmaps

- "Researchers follow trail of sex trafficking to Minnesota massage program" (July 17, 2021)⁴⁵
- "Sex trafficking is behind the lucrative illicit massage business. Why police can't stop it." (December 16, 2019)⁴⁶
- "Behind Illicit Massage Parlors Lie a Vast Crime Network and Modern Indentured Servitude," New York Times (March 2, 2019)⁴⁷
- "Reviews on an illicit massage website helped Florida police crack a massive sex trafficking and prostitution ring that Patriots owner Robert Kraft has been tied to," Business Insider (February 22, 2019)⁴⁸
- "Sex Trafficking Victims Caught in Illegal Massage Parlor Industry" (November 9, 2018)⁴⁹

Skip the Games

• "Man shot in his home by woman he met on site linked to sex trafficking: police" (November 17, 2023)⁵⁰

- "Charlevoix sheriff's department makes arrests in human trafficking sting operation" (August 1, 2023)⁵¹
- "<u>AG Henry Halts Human Trafficking Ring with Arrest of Chambersburg Man Who Beat and Threatened Women in at Least 4 PA Counties</u>," Pennsylvania Attorney General (April 19, 2023)⁵²
- "Chambersburg man charged with allegedly operating human trafficking ring" (April 19, 2023)⁵³
- "Colonie pimp convicted of sex trafficking underage girls, all charges" (March 24, 2023)⁵⁴
- "Oregon Man Sentenced to Federal Prison for Sex Trafficking," U.S. Attorney's Office, District of Oregon (February 7, 2022)⁵⁵
- "Largest human trafficking sting in Ohio history nets 161, including politician, firefighter" (October 4, 2021)⁵⁶
- "How one website could be both facilitating sex trafficking and aiding police stings" (February 28, 2020)⁵⁷

Chaturbate

- "Porn is an un-recognised link in the harm chain of the commercial sex industry" (September 23, 2022)⁵⁸
- "<u>Trafficking & Technology: How Advances in Technology have Impacted the Business of Exploitation</u>" (November 18, 2021)⁵⁹

TNA Board

- "Married man allegedly tried to hire prostitute for threesome with miniature horse" (October 27, 2023)⁶⁰
- "Inside the fight to take down online prostitution review boards" (June 27, 2017)⁶¹
- "Sex trafficking survivor: I was forced into prostitution" (August 17, 2016)⁶²

AdultSearch

- "Prostitute Ran One-Woman Brothel out of Tamarac Apartment, Earning \$19K Per Month" (September 3, 2022)⁶³
- "Ashwaubenon police believe local arrest is tied into international sex trade" (March 22, 2019)⁶⁴

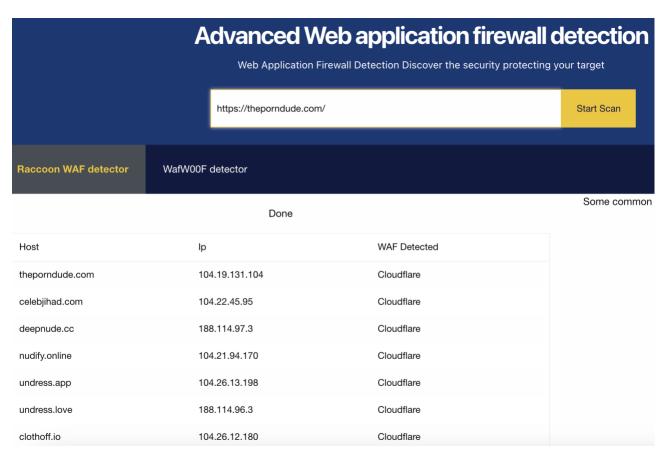
Cloudflare provides infrastructure to sexually exploitative companies OnlyFans⁶⁵ and Seeking⁶⁶ as well. OnlyFans was placed on NCOSE's 2023 Dirty Dozen List⁶⁷ for evidence of child sexual abuse material (CSAM, the more apt term for child pornography), ⁶⁸ sex trafficking, ⁶⁹ child online exploitation, ⁷⁰ harassment, doxing, ⁷¹ cyberstalking, and image-based sexual abuse. ⁷² A Reuters investigation of OnlyFans published March 13, 2024 found that "more than 120 people have complained to U.S. police agencies that they were featured in the site's sexually explicit content without their consent – including a woman who alleged a video of her rape was sold on OnlyFans." Seeking (formerly Seeking Arrangement) is a platform for "sugar dating," which is another term for prostitution, ⁷⁴ and was featured on NCOSE's Dirty Dozen List in 2020⁷⁵ and 2021⁷⁶ for targeting college students ⁷⁷ and people suffering from the economic uncertainty of COVID-19 to groom them to be sexually used by older, wealthier men. Both platforms are well-known among sex buyers and within the commercial sex industry to be primary spots for buying people for sex.

By continuing to provide services to sex buyer review boards and other prostitution sites, Cloudflare is complicit in the harms they perpetuate.

Cloudflare Provides Services for Deepfake Pornography Platforms and Tools

<u>Image-based sexual abuse</u> (IBSA) encompasses a range of harmful activities that weaponize sexually explicit or sexualized materials against the persons they depict. ⁷⁸ IBSA includes creating, stealing, extorting, threatening or actually distributing sexually explicit or sexualized content without the genuine consent of the depicted individuals and/or for the purpose of sexual exploitation. This includes "the nonconsensual use of a person's images for the creation of photoshopped/artificial pornography or sexualized materials intended to portray a person (popularly referred to as "deepfake" pornography)."

Cloudflare provides CDN, DNS, and WAF services for some of the most prolific "nudifying" and deepfake pornography websites, including <u>Clothoff.io</u>,⁷⁹ <u>Undress.love</u>,⁸⁰ <u>Undress.app</u>,⁸¹ <u>Nudify.online</u>,⁸² <u>Deepnude.cc</u>,⁸³ <u>CelebJihad</u>,⁸⁴ and <u>ThePornDude</u>,⁸⁵ and provides DNS services for <u>Undressai.com</u>.⁸⁶



In fact, in August 2023, a Bloomberg review found that "13 of the top 20 deepfake websites are currently using web hosting services from Cloudflare Inc. to stay online." Cloudflare services amplify the access, quantity, and speed of use of such sites. While Mr.Deepfakes 88 doesn't appear to use Cloudflare's services anymore, it had previously used Cloudflare's services since its inception (though it does still appear in Cloudflare Radar Top 50K). 89

CelebJihand – arguably the second most popular deepfake pornography website – functions similar to Mr. Deepfakes and Pornhub as a pornography tube site and reports Cloudflare as its CDN, DNS, and WAF provider. CelebJihad was one of the origin sites of Taylor Swift's deepfake abuse that occurred in

January this year. 90 Cloudflare, as the site's CDN provider, could have removed or banned access to her abuse content on CelebJihad, and chose not to, allowing her abuse to continue to proliferate.

This is especially concerning considering the explosion in popularity of nudifying" technology, which disproportionately affects children and women. In 2023 alone, advertisements for 'undressing apps' increased by over 2,400%. Proposed by teen boys against their female classmates. In February 2024, Clothoff was one of the deepfake pornography tools involved in the sale of nonconsensual deepfake pornography on an online video game marketplace.

Cloudflare could play a leading role in stemming the rapid proliferation of image-based sexual abuse across the globe by ceasing to provide services for deepfake pornography platforms. Conversely, by continuing to support these exploitative tools, Cloudflare is complicit in not only facilitating, but monetizing sexual exploitation.

Unpublished Findings Re Sex Trafficking and Image-Based Sexual Abuse on Cloudflare Clients

The National Trafficking Sheltered Alliance (NTSA)⁹⁴ conducted a national survey of 82 service providers and 39 law enforcement respondents to answer Protection Questions 16, 17, and 19 from the U.S. Department of State's Request for Information for the 2024 Trafficking in Persons Report (TIP Report). With 29 questions in total, 25 were framed based on the questions of the TIP Report itself, and the only alterations were to define or use more widely accepted terms in our field. Four additional questions addressed further field research for partners of NTSA in the full survey for service providers. NCOSE submitted questions for this survey regarding survivors of sex trafficking who had pornography/sexually explicit images made of them by either sex buyers or sex traffickers. Five service providers identified Rubmaps, 17 identified Skip the Games, 14 identified Seeking (formerly Seeking Arrangement), 19 identified YesBackpage, and 35 identified OnlyFans as platforms where victims they serve have been trafficked and/or had their pornography/sexually explicit images non-consensually distributed.⁹⁵ Cloudflare provides services for all these entities. (National Trafficking Sheltered Alliance, Survey for Submission to the U.S. Department of State 2024 Trafficking In Persons Report [Unpublished raw data].)

Cloudflare has so much potential to disrupt the infrastructure of abusive and exploitative sites that facilitate prostitution, sex trafficking, and image-based sexual abuse.

The National Center on Sexual Exploitation calls on Cloudflare to terminate all services to sex buyer review boards, prostitution sites, and deepfake pornography platforms.

Until Cloudflare cuts ties with these dangerous companies, NCOSE will bring your business practices to the attention of the public and to other stakeholders.

Should you wish to reach out to us for further discussion, you may contact us at public@ncose.com.

Thank you for your attention,

Daws Hawkins

Kinebey P. Chedwick

Dawn Hawkins

Kindsey P. Chadwick

CEO

Interim President

Cc:

Michelle Zatlyn, President, Chief Operating Officer, and Director

Douglas Kramer, Chief Legal Officer

https://www.reddit.com/r/RealHookupAdvice/comments/10o5w3y/which are the best escort sites reddit recommends.

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