

Email sent by National Center on Sexual Exploitation to Alfred Kelly, CEO of Visa, on January 26, 2022

Re: Visa facilitating payments for sex trafficking, child sexual abuse material, prostitution, and other forms of abuse OR Re: Visa facilitating payments for sexual exploitation

Dear Mr. Kelly,

The National Center on Sexual Exploitation, including its international centre, has reached out to Visa several times in the past several months, but has not received a response. We trust that many of you do personally care about the victims who are being sexually exploited via institutions for which Visa continues to process payments—**but the lack of robust commitment to address these issues is disturbing and a failure to live up to Visa’s stated corporate social responsibility principles and potentially legal obligations to prevent the facilitation of illegal activity.**

It appears that Visa’s corporate practices have not been improved, despite international outreach from survivors and subject matter experts since early [2020](#) and again in [2021](#). As the largest global payment network, Visa should be leading the industry in stemming sexual abuse and solving these grave issues, instead of remaining silent for the better part of last year, with no substantial progress.

We released a press statement yesterday, on the occasion of your shareholder meeting, calling on Visa to sever partnerships with entities unwilling or unable to adequately prevent and/or remove child sex abuse material, sex trafficking, sexual assault, image-based sexual abuse, etc. and to ensure common sense measures – such as age and consent verification – are required of any merchant selling pornography before Visa allows its services to be used.

We have decided to list Visa on the 2022 Dirty Dozen List, which names 12 companies that are facilitating or profiting from sexual exploitation and abuse. The List will be publicly announced March 8, 2022. When the List is made public, we will be sharing our concerns directly with Visa’s institutional and individual shareholders, alerting them to the fact Visa is opening itself up to liability and is not adhering to ESG principles. We are open to discussing this matter further if Visa is willing to address our concerns outlined below.

Does Visa have any plans to either cut ties with entities known to facilitate sex trafficking and child sexual abuse (i.e. MindGeek-owned entities, OnlyFans, and Seeking, formerly known as Seeking Arrangement?) Or is Visa working to introduce a new policy on performer age/consent verification in the pornography industry? And if not, why not?

As we’ve previously addressed, there has been substantial child sexual abuse and sex trafficking facilitated by MindGeek-owned entities, such as Pornhub—including an investigation by the Canadian government that found they failed to report child sexual abuse materials (child pornography) to law enforcement for nearly a decade. We invited you to attend a virtual congressional briefing on the evidence of illegal and criminal content on Pornhub. [You can](#)

[watch the video of the briefing here](#). Is Visa continuing to process payments for TraffickJunky (a MindGeek-owned advertiser), or for any advertisements on Pornhub specifically?

Similarly, there is serious concern about sexual abuse and non-consensual content on OnlyFans. In fact, this [BBC investigative piece](#) exposed – through whistleblower testimony – how often illegal pornographic videos (even of bestiality, incest, prostitution) are left up to collect views. It shows clearly how this platform has operated in bad faith moderation, as well as elevating the fact that there is very limited technological ability to moderate livestreams in real-time, etc. In addition to this, OnlyFans’ current verification policies are useless in practice, given that a BBC [investigation](#) revealed that a 14-year-old was able to use the passport of her grandmother to create an OnlyFans account. An investigator of child exploitation online for US Homeland Security, also told the BBC that he “estimates he finds between 20-30 child abuse images a week which he says have clearly originated on OnlyFans.”

A case study was conducted recently by the Avery Center, in partnership with law enforcement, which surveyed OnlyFans content creators and found:

- Eleven percent of respondents in the survey said they were aware of minors who had accounts on OnlyFans, and said they estimated they personally were aware of a total of 35 minors who had had content of them sold on the platform.
- Thirty percent of the content creators said they received private messages from suspected traffickers offering to manage their accounts for a portion or all the proceeds from their subscription revenue
- A sample of 97 public Instagram accounts of sex sellers with OnlyFans links in their bios were analyzed for indicators of third-party traffickers and thirty six percent were categorized as “likely third-party controlled” while the remaining percentage was categorized as “unknown.”

You can read the full report using the below password and link:

Password: AveryCenterReport

<https://ncose.egnyte.com/dl/r7DmL34Xgh>

We would be happy to host a briefing for you with the authors of the report, survivors, and law enforcement personnel about how OnlyFans facilitates illegal activity.

In addition to this, it appears that Visa processes transactions for Seeking (formerly Seeking Arrangement)-- a “sugar dating” website which is a hub of prostitution and even sex trafficking, as shown by the recent [case](#) below:

Bellevue police said they arrested a man who was allegedly trying to lure a 13-year-old middle school student into having sexual relations. The two connected last year on websites that included Seeking Arrangement and Sugar Daddy Meet.

We sincerely hope that Visa will make a robust effort to address its continued business model of processing payments for platforms that facilitate sexual exploitation.

Sincerely,

Haley McNamara, MA

Director, International Centre on Sexual Exploitation

Vice President, National Center on Sexual Exploitation