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March 7, 2022

Amrapali Gan  
CEO  
OnlyFans  
Fourth Floor Imperial House  
8 Keen Street  
London WC2B 4AS  
United Kingdom

### Re: OnlyFans on 2022 Dirty Dozen List

Dear Ms. Gan,

We are writing to inform you that the National Center on Sexual Exploitation is placing OnlyFans on the 2022 Dirty Dozen List—a campaign that identifies 12 mainstream contributors to sexual exploitation and abuse. Due to OnlyFans' failure to make any substantive changes to stem the sexual exploitation and abuse on its platform, OnlyFans remains on the Dirty Dozen List for the second year in a row.

### *OnlyFans facilitates sex trafficking, child sexual exploitation, pimping, and other illegal activities.*

There is an overwhelming amount of evidence that **OnlyFans facilitates sex trafficking, child sexual exploitation, pimping, and other illegal activities.** As you are likely aware, the BBC has been publishing a series of investigative pieces covering these issues, beginning in May 2021. These pieces have described the repeated failure of your age and consent verification systems, in addition to OnlyFans' apparent willingness to tolerate illegal material if it is making you a large profit. The BBC's investigations uncovered an alarming number of minors who were uploading explicit videos and nude images to OnlyFans themselves, thereby self-generating child sex abuse material (CSAM), after buying into the propaganda circulating on social media that OnlyFans offers them a path to fame, popularity, and riches.

Law enforcement, including human trafficking investigators and federal agents, have also been sounding the alarm about the increasing instances and indicators of child and adult sex trafficking and child sex abuse material they're seeing in connection to

OnlyFans.<sup>i</sup> A U.S. Homeland Security child online exploitation investigator told NCOSE that he estimates that he finds between **30–50 child abuse images a day** that “have clearly originated on OnlyFans.” A research collaboration project between Human Trafficking Detective Joseph Scaramucci and anti-sex-trafficking non-profit The Avery Center analyzed public Instagram accounts which had OnlyFans links in their bios. Of these accounts, **36% were classified as “likely third-party controlled.”**<sup>ii</sup> Detective Scaramucci explained there are important indicators that the women in some of the pictures may be victims coerced by sex traffickers even when the pornographic images seem consensual to the casual observer.<sup>iii</sup>

**OnlyFans’ age and consent verification systems have thus proven to be insufficient**, as many children and coerced adults have slipped through the cracks.

The BBC investigations also uncovered **OnlyFans’ marked willingness to tolerate illegal material, if it is making you a large profit**. Whistleblowers informed the BBC that OnlyFans’ moderators do not immediately shut down accounts that post illegal or banned content, and that they are specifically instructed to be more lenient towards lucrative accounts. One moderator, who testified to the BBC under the pseudonym Christof, stated: “There is a discrimination between accounts. It shows money is the priority.”<sup>iv</sup>

Further, **OnlyFans encourages grooming and pimping through its referral system**, which allows individuals to profit up to 5% of anyone’s earnings from new sign ups generated via their referral link for the first year of the new user’s account. Given this system, it is no surprise that unaffiliated online pimps actively recruit new girls and women to join. One survivor of OnlyFans explained the tactic: “They usually approach the model on Twitter and groom her so that she will agree to let them help ‘manage’ her online presence in exchange for a cut. People are desperate [and] naive and they fall for it. This naturally creates a perfect opportunity for blackmail and other types of emotional manipulation. It happens all the time. And it isn’t talked about nearly enough...” In a survey of past and current OnlyFans content creators, 30% said that they had had this experience of a suspected traffickers messaging them, offering to manage their account for a share of the profits. These content creators had received such messages an average of seven times.<sup>v</sup> Recent coverage from the Rolling Stone related numerous testimonies from content creators who fell to the false promises of so-called “managers”, only to be financially abused, deceived, trapped into exploitative contracts, blackmailed, and to have their images distributed without their consent.<sup>vi</sup>

### ***OnlyFans is an unsafe platform for content creators.***

OnlyFans promotes itself as a safe platform for content creators, but this is far from the truth. Numerous OnlyFans content creators have spoken out about the psychological and physical trauma they endured on your platform. OnlyFans users have also spoken about how the platform is a hotbed for blackmail, “leaked” information and videos, stalking, harassment, and is a competitive marketplace that drives performers to perform increasingly violent or degrading acts.

In the aforementioned survey of past or current OnlyFans content creators, 34% said that they had experienced direct negative impacts on their mental or physical health. Only 11% felt that OnlyFans was a safe platform for content creators.<sup>vii</sup>

OnlyFans creators have publicly noted that once they began selling content on OnlyFans, they were pressured to escalate toward producing “content” they were uncomfortable with, because satisfying the demand of the buyers was the only way to make any money.<sup>viii</sup> “The competition means that you push the boundaries, otherwise you leave,” a former OnlyFans content creator from Sweden shared with the media.<sup>ix</sup>

Creators have also reported being harassed, doxxed, stalked, having their images stolen and reposted without their consent, threatened, and more.<sup>x</sup>

One creator shared with the BBC that a male subscriber threatened violence after she declined to have sex with him. He sent her messages including:

*“I know where you live.”*

*“I’m going to hunt you down.”*

*“I’m going to kill your children.”*

*“I’m going to rape you.”*

*“I’m going to make your husband watch me as I hurt you, then I’m going to kill you.”*

*“I hope all of your family get Covid and die.”*

When the creator reported these threats to OnlyFans they responded that “rude messages” did not violate their guidelines and the subscriber’s account would not be removed.<sup>xi</sup>

Journalist Julie Bindel wrote for the UK Standard: “Some of the women who provide content end up scared and traumatized. One woman told me she still can’t sleep after a stalking incident two years ago. ‘My biggest fan,’ said [the woman], laughing bitterly at the irony, ‘managed to trace me to my place of work and actually waited outside for me one day. I was appalled and terrified.’”<sup>xii</sup>

## ***Recommendations***

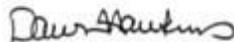
Because OnlyFans has utterly failed to prevent or reduce the many harms on its platform, despite OnlyFans’ assertions that it goes “above and beyond” to keep users safe through artificial intelligence, third-party age verification systems, and human review, the most logical course of action is to ban and proactively remove sexually explicit content altogether.

We urge you to implement these changes as soon as possible and to prioritize the safety of sex trafficking victims, child sexual exploitation victims, and your content creators.

Sincerely,



Patrick Trueman, Esq.  
President



Dawn Hawkins  
CEO

The National Center on Sexual Exploitation

Cc:

Erika Coppel, Head of Social and Creator Experience