



**NATIONAL
CENTER ON
SEXUAL
EXPLOITATION**

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January 25, 2019

Evan Spiegel
Co-Founder and Chief Executive Officer
Snap Inc.
63 Market Street
Venice, CA 90291-3603

Dear Messrs. Spiegel, Murphy and Grusd:

Although the Snapchat platform is frequently used to sexually exploit and objectify individuals, and is frankly used to traffic and prostitute adults and children for sexual acts, we are writing to thank Snapchat for a number of improvements which help to make the platform safer. We are hopeful that Snapchat will continue this trajectory and will serve as a partner in the fight against sexual exploitation by addressing two major problems on Snapchat.

In recent years, The National Center on Sexual Exploitation has submitted a number of requests for policy changes at Snapchat and placed Snapchat on the annual Dirty Dozen List which names 12 leading facilitators of sexual exploitation in America. We thank you for the following improvements made by your team and want to inform you of your removal from the Dirty Dozen List to the Watchlist:

Recent Improvements:

- Snapchat now allows Discover publishers to age-gate content, and allows users to delete specific Discover publishers.
- Snapchat discontinued Snapcash—which NCOSE previously informed Snapchat was being used to buy and sell pornographic images and videos, often acting as advertisements for prostitution and sex trafficking or to pay for sex acts arranged through the platform for offline.
- Following NCOSE's 2018 letter requesting in-app reporting systems, Snapchat now provides prominent in-app reporting systems for users to report other users that send or promote nudity, sexually exploitive content, and other report topics.

If there are other improvements Snapchat has made to help curb sexual exploitation, we welcome your feedback as we would greatly like to share these tools with leaders in the anti-exploitation movement and with

parents.

We request that Snapchat continue prioritizing user-safety and wellbeing by addressing 1.) Discover publisher’s promotion of sexually graphic material to children, and 2.) Accounts regularly distributing pornography, at times even including sex trafficking and prostitution. We welcome open dialogue with Snapchat to better address these and future issues.

1. Discover Publishers Sending Sexually Graphic Content to Minors

While Snapchat made it possible Discover publishers to age-gate certain content, Snapchat has not required Discover publishers to be accountable for the messages they send underage audiences. This inappropriately puts the onus of responsibility on children.

News reports indicated that Snapchat issued guidelines to publishers that include restrictions on profanity, sexualized content, sex acts, and sex toys in tiles, as well as repeated use of clothed but sexualized bodies.¹

Unfortunately, Snapchat’s policy leaves publishers, which include the likes of *Cosmopolitan*, *Brother*, *The Daily Mail*, MTV, and Comedy Central (some of the worst offenders for piping a steady stream of hyper-sexualized, pornified content), to be the arbiters of what constitutes restricted content.

As a result of lack of oversight or strict requirements, Discover publishers are shirking their responsibility to age-gate such content. Children as young as 13 years old are being exposed to Discover stories with sexualized content, explicit descriptions of sex acts, repeated hypersexualized images, and more, despite Snapchat’s aforementioned guidelines.

For example, a 13-year-old user is exposed to content in Discover such as the below stories:



¹ Kerry Flynn “Snapchat Discover is cracking down on sex, clickbait and fake news” 2017. <https://news.yahoo.com/snapchat-discover-cracking-down-sex-182121725.html>

We request that Snapchat recognize its young users ought to receive user-focused design. And so, we request that Snapchat require all publishers to age gate any content for minor users that includes profanity, sexualized content, sex acts (in written or visual depiction), sex toys, as well as repeated use of clothed but sexualized bodies.

2. Accounts Regularly Posting Pornographic Imagery and Videos, Including Sex Trafficking/Prostitution

While Snapchat has a good policy on paper to “prohibit accounts that promote or distribute pornographic content,”² it is not being adequately enforced.

There are numerous accounts not only regularly posting nude images and videos, but also monetizing these images via third party payment options, providing links to hardcore pornography websites, and advertising for potential sex trafficking or prostitution.

There are numerous lists across the internet that guide Snapchat users to find accounts that post pornography. One such website writes:

“Naked girls on Snapchat are becoming far more common...

Porn Snapchat Accounts

Some of the best Snapchat porn on the internet are from porn stars. We have an exclusive list of the hottest porn stars that send out Snapchat nudes and they’re available for anyone to add. You can find out if your favorite porn star has their own Snapchat account and receive messages from them...

Amateur Snapchat Accounts

Not everyone’s into porn stars though, we get it. Some people prefer amateur girls who have nothing to do with the industry. Some of the best snapchat nudes are just the regular typical girl that you would run into every day. If you’re bored and tired of watching porn, then maybe you need a breath of fresh air and enjoy some amateur Snapchat porn...

There are thousands and thousands of porn snapchat accounts, so unless you’re planning on adding a ton of accounts, find out what kind of kink or fetish you’re into and search specifically for those...

Some girls don’t show off their bodies for free and there are some naked girls on Snapchat that only give out their account to subscribers or customers. Some live streamers, for example, have exclusive Patreon accounts where only their highest paying members get access to their Patreon.”³

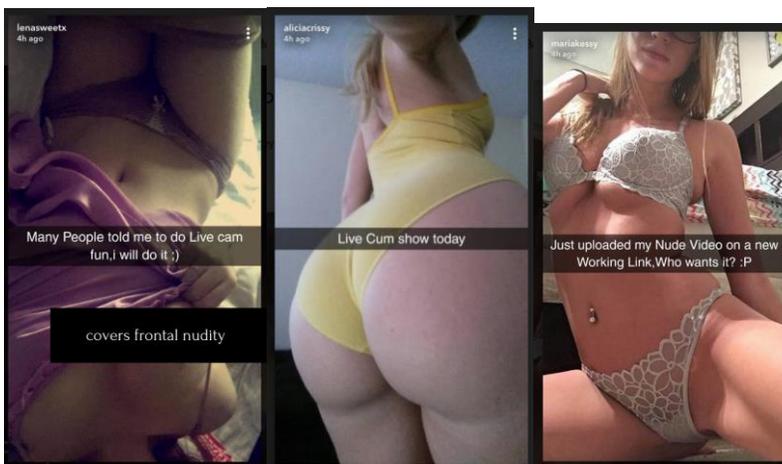
Pornography performers and unassociated individuals are habitually sending pornography, but they are not being reported.

Underage users are also able to access and view these accounts.

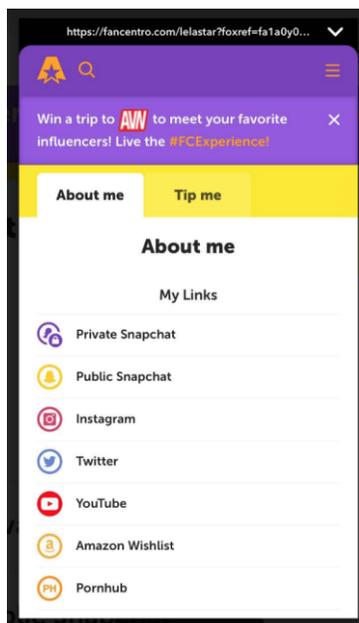
² <https://support.snapchat.com/en-US/a/guidelines>. Accessed January 2019.

³ <http://snaphotnames.com/>. Accessed January 2019.

Proof: Found January 2019.



Proof of a pornography performer Snapchat user advertising for a private Snapchat account for pornography, and live links to a pornography website.



We request that Snapchat dialogue with the National Center on Sexual Exploitation about what steps Snapchat currently takes to proactively remove accounts such as these, in order to improve these systems.

Pornography is Being Used to Advertise for Sex Trafficking and Prostitution on Snapchat

As our society has increasingly entered the digital age, so have sex traffickers and pimps.

It is an accepted fact, supported by survivors of sex trafficking, that pornographic pictures and videos are used to advertise for both sex trafficking and prostitution victims (including minors.)

Further, law enforcement is finding that many sex trafficking victims,⁴ and child sexual abuse imagery (i.e. child pornography) victims,⁵ are coerced into creating livestream or webcam pornography as well.

Accounts posting and selling pornographic content, from images to videos to livestreams, and even requests for sugar baby/mommy dates, are undeniably flourishing on Snapchat.

As reported by the McAfee Institute, “Ever since the implementation of snap cash (sic), Google Wallet, and other payment options, more people are buying adult entertainment on snap chat. It’s almost like a live porn hub. It is a pretty simple operation. There are plenty of ways to search for people that are selling nudes, videos, and chat on snap chat.”⁶

It has been documented by law enforcement that pimps and sex traffickers often either coerce trafficking or child abuse victims into making such advertising posts, or the pimp and sex trafficker creates the posts themselves in their victim’s name. This is what was found to happen on Backpage.com—the notorious classifieds ads website that was recently shut down by the Department of Justice for knowingly facilitating sex trafficking ads.

As long as your platform fails to proactively remove accounts posting pornography, and failing to remove ads for sex acts (whether recorded, live streamed, or in person) it is impossible to distinguish between those that are allegedly willingly distributing pornographic content and those whose pages are being managed by a sex trafficker or pimp.

Tragically, several cases of sex trafficking have been linked to sexual predators lurking on Snapchat, including in 2016, 2017 and 2018.⁷ This is yet another indicator that Snapchat shoulders an important responsibility to ensure its policies and practices combat, instead of encourage, sexual harm.

These problems leave your company not only vulnerable to a detrimental public image crisis, but also allow harms your goal for the platform to be a fun and safe environment for users to enjoy and share their moments.

As you know, Apple’s App Store recently removed the Tumblr app due to concerns about child sexual abuse images on that site. We believe Snapchat needs to address these issues holistically in order to avoid a similar outcome.

We hope that facts like these will cause you as much concern as they do us.

⁴ Sunshine de Leon, “Cyber-sex trafficking: A 21st century” 2013. scourge<https://www.cnn.com/2013/07/17/world/asia/philippines-cybersex-trafficking/index.html>

⁵ Martha Mendoza and Jim Gomez, “AP Exclusive: Big child webcam sex bust reveals rising abuse” 2017. <https://www.apnews.com/74b81f79e9024124a1cfe43a0ce9eec2>

⁶ McAfee Institute, “Locating Prostitution on Snapchat,” (n.d.), <http://blog.mcafeeinstitute.com/locating-prostitution-snapchat/> (accessed February 19, 2017).

⁷ Kate Briquet, “Dad Saves Daughter from Snapchat Sex Traffickers,” *The Daily Beast* (October, 10, 2016) <http://www.thedailybeast.com/articles/2016/10/10/dad-saves-daughter-from-snapchat-sex-traffickers.html> (accessed February 20, 2017). Maryam Shah, “Snapchat Meeting Led to Woman Being Forced into Sex Trade: Cops” *Toronto Sun* (July 20, 2016), <http://www.torontosun.com/2016/07/20/snapchat-meeting-led-to-woman-being-forced-into-sex-trade-cops> (accessed February 20, 2017). Riley Johnson, “Police: Lincoln sex trafficking suspect met minor on Snapchat, told her to 'auction' herself,” *Lincoln Star Journal*, September 26, 3018. https://journalstar.com/news/local/911/police-lincoln-sex-trafficking-suspect-met-minor-on-snapchat-told/article_ad4b02e8-8db3-5700-bae8-58ac1102a3f8.html

Of course, we recognize that you cannot control the actions and outcomes of the individuals using your services. However, as the creators and guardians of Snapchat you are responsible for enforcing your policies proactively to protect your users.

We hope Snap Inc., will rise to this challenge and meet with us to discuss ways by which it can become a corporate partner in the fight for a world free from sexual exploitation.

Sincerely,

Patrick Trueman
President & CEO

Dawn Hawkins
Senior Vice President & Executive Director

CC:
Bobby Murphy, Co-Founder and Chief Technology Officer
Jared Grusd, Chief Strategy Officer