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April 3, 2024

Mr. Jason Citron
CEO and Co-Founder, Discord
444 De Haro Street, Suite 200
San Francisco, CA 94107

Re: Discord placed on 2024 Dirty Dozen List for facilitation of sexual abuse and exploitation of both children and adults

Dear Mr. Citron:

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

NCOSE recognizes that within the past year, Discord has announced a series of policy updates and new features for which NCOSE has been advocating for several years: specifically, blurring nudity for minors through [Teen Safety Assist](#)¹ and banning sexualization of children, including through AI-generated CSAM. These updates were anticipated to mark a considerable improvement in Discord's platform safety, and we were eager to publicly applaud these changes. In fact, we were poised to officially remove Discord from the Dirty Dozen List and to place it on our "Watchlist."

Unfortunately, NCOSE and other [child online safety experts](#) discovered the **policy changes Discord announced in July 2023 and October 2023 have not yet been implemented.**² In fact, after testing your new policies and uncovering alarming gaps and failures, we reached out repeatedly to your Senior Director of Policy, Savannah Badalich, offering to share our results. NCOSE initially had some back and forth communications with Ms. Badalich over email and LinkedIn in which we expressed our desire to move Discord to the Watchlist. However, once we sent evidence that Teen Safety Assist was not automatically blurring sexually explicit content, together with evidence of servers containing high indicators of CSAM sharing, image-based sexual abuse (what Discord refers to as "[non-consensual adult intimate](#)

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[media](#)”),³ exploitative “nudging” bots, teen dating hubs, and even the promotion of “dark web porn” events.... we never heard back.

Most disconcerting is that you, Mr. Citron, testified under oath to members of Congress and the American people in your [verbal](#)⁴ and [written](#)⁵ statements in the January 31, 2024 Senate Judiciary Hearing that the Teen Safety Assist feature that automatically blurs sexually explicit images for minors was implemented, and that teens had the ‘highest’ safety settings on by default. That was patently untrue then and is still untrue as of the drafting of this letter.

Given this apparent falsehood by Discord – coupled with the constant stream of stories of sexual abuse and exploitation on the platform – NCOSE is obligated to leave Discord on the 2024 Dirty Dozen List. We must continue alerting families, policymakers, and press about the realities of what is and is not being done by Discord to protect children on your platform.

The National Center on Sexual Exploitation reiterates its recommendations to Discord:

1. **Prioritize image-based sexual abuse (IBSA) and child sexual abuse material (CSAM) – including AI generated – prevention and removal** by instituting robust age and consent verification.
2. Default **all minors’ accounts to the highest level of safety and privacy** available on the Discord platform.
3. **Automatically age-gate servers that contain any age-restricted channels** (i.e., channels hosting sexually explicit content) and automatically block minors from joining such servers.
4. **Add the following features to Family Center caregiver oversight tool:**
 - a. Friend requests (for all minors under 18) with no friends in common must be approved by a parent.
 - b. Friend requests from servers/group members/individuals with ISP addresses in other countries or states must be approved by a parent.
 - c. Parent receives name and notification when adult requests to friend teen or when teen requests to friend an adult.
 - d. Platform limits number of friend requests teens can send or receive from adults or strangers weekly.
5. Permanently **suspend Pornhub’s verified** Discord account.

We have presented Discord with extensive evidence of exploitation yearly since 2021. You have those letters. We will not repeat the same information that we have in the past (even though the harms and problems still exist). However, we do highlight new proof that Discord remains a very dangerous place for children and adults alike.

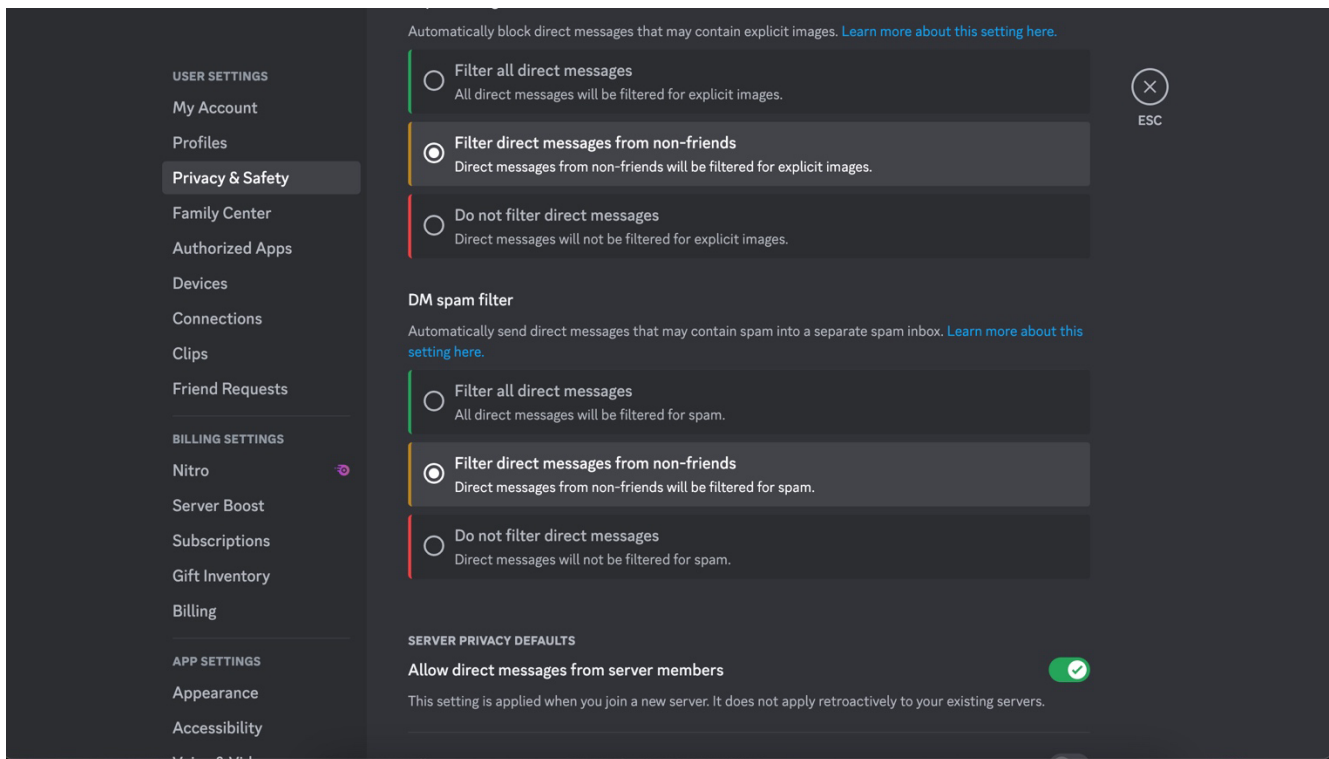
Failure to Implement Effective and Robust Safety Features

From November 2023 to March 2024 NCOSE researchers conducted monthly tests using a combination of old and new minor-aged and adult accounts. These investigations examined Discord’s updated child & teen safety policies announced July 2023 and features like Teen Safety Assist announced October 2023. This feature is supposed to automatically blur sexually explicit content and to provide warnings and security resources to teens when adults try to message them directly.

During our investigations:

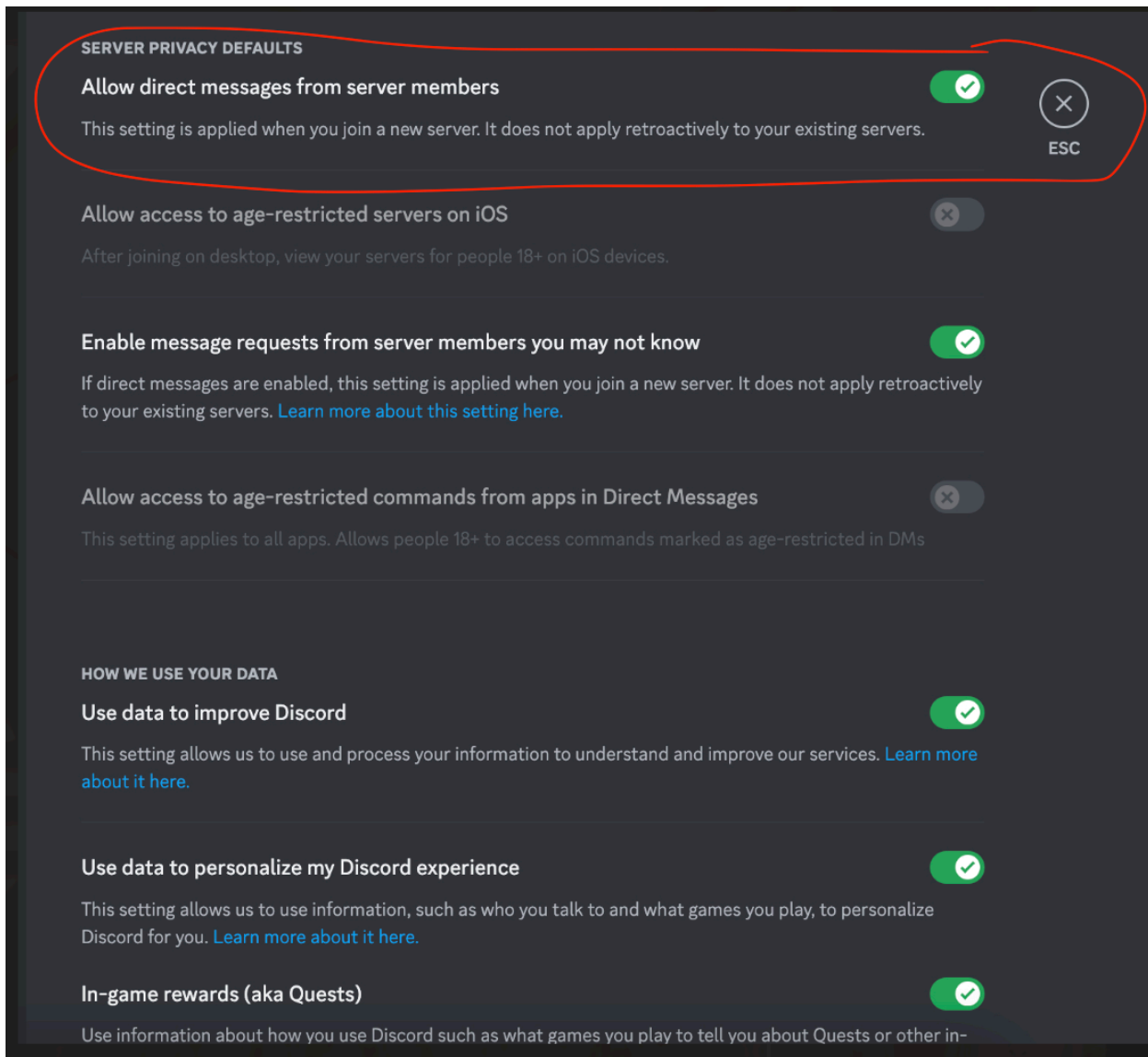
- NCOSE researchers did not receive warning messages when an unconnected NCOSE adult-aged account or any other unconnected Discord account sent a direct message to a NCOSE minor-aged account.
- NCOSE’s adult-aged accounts were not blocked from sending sexually explicit imagery to NCOSE’s minor-aged accounts.
- Sexually explicit imagery was not blurred for NCOSE’s minor-aged accounts on any part of the platform, including in direct messaging.
- Researchers using minor-aged accounts did not face difficulties in locating sexually explicit content, channels, or servers through simple searches like “p0rn.”

Furthermore, multiple minor-aged accounts (new and old) that NCOSE tested were not defaulted to higher safety settings as promised on Discord’s policy pages and during Congressional testimony. Here is one example of what settings look like for a 14-year-old account created Tuesday, March 19.



Screenshot of minor-aged account (14-years-old) created March 19: not defaulted to the highest settings as promised by Discord

In addition to the above recommendations, we also suggest that Discord turn the “allow direct messages from server members” option OFF by default for minors across all servers (not server by server) and implement this retroactively.



For the last four years, NCOSE has documented Discord’s failure to demonstrate any serious improvements to the implementation of promised policies and safety features. Such missing **tools would protect and lower the risks of harm to the millions of teens on your platform** (not to mention the children who should not be on your platform, but who are nevertheless using Discord due to your poor age verification measures).

Further, [despite your Congressional testimony stating](#), “We deploy a wide array of techniques that work across every surface on Discord,”⁶ Discord does NOT:

- proactively block **URLs to known child sexual abuse and exploitation material**
- proactively detect **known CSAM videos in servers or direct messages**
- proactively detect **CSAM (known or new) in avatars or profile pictures**
- have measures in place to **detect CSAM or exploitation in server livestreams or audio calls**
- have an **in-app reporting function for livestreams or audio calls**

- **automatically notify Discord Trust & Safety staff** when volunteer moderators, administrators, or creators action users for CSAM or exploitation within their servers
- provide users with an **in-app option to report servers**

The disparity between what Discord says they are doing – even when under oath – and what Discord is NOT doing presents serious negative evidence against the repeated public commitments to proactively improve the safety and wellbeing of Discord users, especially those aged 13-17.

Child Sexual Abuse and Exploitation Facilitated Through Discord

Discord has repeatedly stated its zero-tolerance policy for child sexual abuse and exploitation, emphasizing Discord’s many features and policies protecting minors from predatory adults, teen dating, and from accessing sexually explicit content. These assertions were even made [under oath](#) at the January 31 Senate Judiciary Committee hearing.⁷

Yet, on February 21, 2024, NCOSE identified numerous servers containing high indications of CSAM and sexualization of minors after searching “p0rn” on Discord’s Discover page. The second server listed for the search “p0rn” was literally called “child pornography.”

Other child protection organizations and researchers have also found evidence suggesting that buying, selling, and trading of CSAM is prevalent on Discord, including the following:

- [Tech Platforms Used by Online Child Sex Abuse Offenders](#) (Suojellaan Lapsia, Protect Children, February 2024)⁸
 - **Discord was the #3 most mentioned platform** (23%) CSAM offenders use to search for, view, or share CSAM
 - **Discord was the #3 most mentioned platform** (26%) where CSAM offenders attempted to contact children
- [Thorn Report](#) (November 2023)⁹
 - 40% of minors who have shared their own SG-CSAM use Discord at least once per day
 - 34% of minors who have reshared SG-CSAM of others use Discord daily
 - 28% of minors who have been shown non-consensually reshared SG-CSAM use Discord daily
 - 17% of minor Discord users have had an online sexual interaction on the platform; 10% with someone they thought was 18 or older
- Discord is the #2 app “[where child sex abuse sharing happens on social media](#)” according to parents (Parents Together, 2023)¹⁰
- A [June 2023 report](#) from the Stanford Internet Observatory found Discord servers selling CSAM were advertised on Instagram, with servers containing hundreds or thousands of users.¹¹

Additionally, despite claims to “immediately remove” CSAM when aware of it, Discord is [notoriously slow](#) at actioning CSAM reports – whether by their users, government agencies, or law enforcement.¹² The National Center for Missing and Exploited Children (NCMEC) reported that Discord is [one of the slowest corporations](#) to remove or respond to CSAM (at an average of 4.7 days).¹³

According to the Australian eSafety Commissioner, [Discord's average response time](#)¹⁴ for actioning user reports of child sexual abuse material and exploitation was as follows:

- Direct messages: 13 hours
- Servers (public): 8 hours
- Servers (private): 6 hours
- Server livestreams: Discord does not have an in-service reporting function for livestreams since they do not monitor or save livestream videos or audio calls.

Image-Based Sexual Abuse, including Deepfake Pornography on Discord

Discord's platform continues to be a haven for sexually exploitative technology and imagery despite policies against [image-based sexual abuse](#),¹⁵ including AI-facilitated sexual abuse. "Nudifying" bots, deepfake pornography, and AI-generated pornography still have a [pervasive presence](#) on Discord.¹⁶

One of the most concerning things NCOSE witnessed throughout 2023 was Discord's growing symbiotic relationship with the "new dark web" platform [Telegram \(also on the 2024 Dirty Dozen List\)](#).¹⁷ In September 2023, the FBI issued a [press release](#)¹⁸ detailing the emergence of a sadistic sexual extortion ring operating across Discord and Telegram, describing it as a "network that targets minor victims online, grooming and coercing them through threats, violence, blackmail and extortion to engage in destructive behavior, including producing child sexual abuse material ('CSAM') and engaging in self-mutilation, as well as violent acts against others."

The connection between Discord and Telegram only accelerates and augments the amount of abusive content circulating on these two platforms. Discord's inadequate measures against cross-platform abuse, including [deepfake pornography](#) and "nudifying" bots, exacerbate threats to online safety and allow harmful communities and content to proliferate with ease.¹⁹

In November 2023, NCOSE alerted Discord to servers dedicated to image-based sexual abuse where users were sharing sexually explicit images of women and hosting events promoting deepfake pornography and "nudifying" bots. One server, SnapDress, was **hosting 47 events in ONE day** dedicated to synthetic sexually explicit media (or SSEM, an umbrella term encompassing all forms of AI-facilitated sexual abuse) and image-based sexual abuse (IBSA). At the time NCOSE discovered the server, it contained over 24,000 members.

Users had the option to purchase [points](#) to utilize the "nudifying" bot on the Discord server,²⁰ instead of buying direct access to the bot. Points represent Discord's customizable currency system designed to encourage member engagement, thereby enabling Discord to monetize SSEM and IBSA directly.

The SnapDress servers identified were connected to a larger network that NCOSE originally discovered on Telegram. Researchers then traced a link to the Discord server. Throughout 2023, multiple instances of non-consensual image generators being monetized on Discord were revealed.

A November 2023 investigation by [Bellingcat](#) revealed that an AI image generator operating on Discord, AnyDream, was profiting from the creation and distribution of deepfake pornography.²¹ Following the publication of the investigation, Discord removed AnyDream's server, saying it violated

their Community Guidelines against non-consensual sexually explicit content, including AI-generated materials.

In June 2023, Discord similarly failed to proactively remove servers connected to the most notorious deepfake pornography website in the United States, Mr.Deepfakes. Server members were advertising their “services” to create deepfake pornography upon request across multiple Discord servers, advertising links to Mr.Deepfakes, and selling deepfake pornography within the servers themselves. Discord only removed the violating servers and members after [NBC published an investigative article](#) publicly outing Discord’s inaction.²²

Discord’s Deceptive Claims about Age-Gating Tools and Safeguards for Minors

Discord has a [written policy](#)²³ prohibiting individuals under 18 from accessing sexually explicit content and your sworn [testimony](#)²⁴ at the Senate Judiciary Committee Hearing earlier this year stated, “Our policies state that those under the age of 18 are not allowed to send or access any sexually explicit content, and users are only allowed to post explicit content in spaces that are behind an age-gate or in DMs or GDMs with users who are 18 and older.” **Despite these claims, NCOSE researchers found that minor-aged accounts can still [access servers with age-restricted material and send sexually explicit material.](#)**²⁵

In February 2024, using a minor-aged account, NCOSE researchers searched variations of banned words “sex” and “porn” and were suggested over 100 communities containing high indications of child sexual abuse material, image-based sexual abuse, hardcore sexually explicit content, and teen dating servers on Discord’s Discover page. Some of the server thumbnails even contained sexually explicit imagery – a violation of Discord’s [policies](#)²⁶ but that is clearly not a priority for Discord as [proactive detection and removal technology is not applied to this content.](#)²⁷ This discovery raises concerns about the effectiveness of Discord’s age-restriction measures and the presence of inappropriate and potentially illegal content accessible to minors on your platform. It is strikingly clear that just because Discord has a policy, it does not mean this policy is being enforced.

Additionally concerning is that Discord [does not allow server owners to self-designate servers as sexually explicit.](#)²⁸ This places the responsibility on Discord to designate servers where a “majority” of content is sexually explicit, (‘majority’ being a vague term considering Discord does not specify a specific threshold or quantity associated with it), and ensuring minors cannot access these servers. Given Discord’s lack of accountability for enforcing policies and prioritizing user safety, delegating this to Discord is too great of a responsibility for the platform to handle.

Research shows that children under the age of 13 are frequently on Discord. A 2023 report by Common Sense Media found [25% of children 11-12 years old](#) report using Discord regularly despite it being rated for teens 13+.²⁹ Further, a November 2023 Thorn report found that [36% of minors aged 9-12 report having ever used Discord.](#)³⁰

According to the Australian eSafety Commissioner, between February and October 2023, Discord only removed 224,000 accounts for not meeting the minimum age requirement. Out of those 224,000 accounts, Discord was only responsible for [proactively removing 2% of accounts believed to be under the age of 13](#), relying on user reports 98% of the time to flag underage accounts.³¹

Discord’s failure to prevent users aged 12 and under from accessing the platform raises concerns about the effectiveness of its age verification and content restrictions. These measures are intended to safeguard minors from exposure to inappropriate content and potential risks posed by adults.

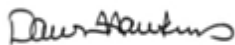
Considering the significant risks to minors and delayed remedial actions, **NCOSE strongly recommends prohibiting minors from using Discord until comprehensive reforms are implemented to safeguard against grooming, exploitation, and the distribution of harmful material.**

Discord should also consider **banning pornography and sexually explicit content** until substantive age and consent verification for sexually explicit material can be implemented – otherwise, sexual abuse and exploitation will continue to plague the platform. As a platform facilitating communication and community, it is Discord’s responsibility to ensure a safe environment for all users, especially the most vulnerable.

NCOSE once again extends our offer to collaborate with Discord to review and improve your safety measures. Discord should prioritize the welfare and protection of its users, especially children, and take urgent action to prevent sexual exploitation on your platform.

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

Thank you for your attention,



Dawn Hawkins

CEO



Kindsey P. Chadwick

Interim President

Cc:

Stanislav Vishnevskiy, Chief Technology Officer and Co-Founder
Savannah Badalich, Senior Director of Policy

Attached: 2023 Dirty Dozen List Notification Letter to Discord

¹ Savannah Badalich, “Building a Safer Place for Teens to Hang Out,” *Discord*, October 24, 2023, <https://discord.com/safety/safer-place-for-teens>.

² Parents Together (@parentstogether), “Big Tech CEO Testimony Response,” Instagram video, February 2, 2024, <https://www.instagram.com/p/C23ODD-s7SW/?hl=en>.

³ Discord, “Non-Consensual Adult Intimate Media Policy Explainer,” *Discord Policy*, March 15, 2024, <https://discord.com/safety/non-consensual-intimate-media-policy-explainer>.

⁴ Justin Hendrix, Prithvi Iyer, and Gabby Miller, “Transcript: US Senate Judiciary Committee Hearing on ‘Big Tech and the Online Child Sexual Exploitation Crisis,’” *Tech Policy Press*, January 31, 2024, <https://www.techpolicy.press/transcript-us-senate-judiciary-committee-hearing-on-big-tech-and-the-online-child-sexual-exploitation-crisis>.

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- ⁵ “Big Tech and the Online Child Sexual Exploitation Crisis,” *Hearing Before the United States Senate Committee on the Judiciary*, 118th Cong., (January 31, 2024) (written testimony of Jason Citron, Chief Executive Officer and Co-Founder, Discord, Inc.), <https://www.judiciary.senate.gov/imo/media/doc/2024-01-31-testimony-citron.pdf>.
- ⁶ Hendrix, Iyer, and Miller, *ibid*.
- ⁷ *Ibid*.
- ⁸ Tegan Insoll, et al., *Tech Platforms Used by Online Child Sexual Abuse Offenders: Research Report with Actionable Recommendations for the Tech Industry* (Helsinki, Finland: Suojellaan Lapsia Protect Children, February 2024), https://bd9606b6-40f8-4128-b03a-9282bdcff0f.usrfiles.com/ugd/bd9606_0d8ae7365a8f4bfc977d8e7aeb2a1e1a.pdf.
- ⁹ Thorn and Benenson Strategy Group, *Youth Perspectives on Online Safety, 2022: an Annual Report of Youth Attitudes and Experiences* (Thorn, November 2023), https://info.thorn.org/hubfs/Research/22_YouthMonitoring_Report.pdf.
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- ¹¹ David Thiel, Renée DiResta, and Alex Stamos, *Cross-Platform Dynamics of Self-Generated CSAM* (Stanford Internet Observatory, June 2023), <https://purl.stanford.edu/jd797tp7663>.
- ¹² National Center on Sexual Exploitation, “Discord Dishonestly Responds to How it Handles Child Sexual Abuse Material After Being Named to 2023 Dirty Dozen List,” news release, May 3, 2023, <https://endsexualexploitation.org/articles/discord-dishonestly-responds-to-how-it-handles-child-sexual-abuse-material-after-being-named-to-2023-dirty-dozen-list>.
- ¹³ NCMEC, *2022 Notifications Sent by NCMEC Per Electronic Service Providers (ESP)* (National Center for Missing and Exploited Children, May 2023), <https://www.missingkids.org/content/dam/missingkids/pdfs/2022-notifications-by-ncmec-per-esp.pdf>.
- ¹⁴ eSafety Commissioner, *Basic Online Safety Expectations: Summary of Industry Responses to Mandatory Transparency Notices* (Australian Government eSafety Commissioner, October 2023), https://www.esafety.gov.au/sites/default/files/2024-03/Basic-Online-Safety-Expectations-Full-Transparency-Report-October-2023_0.pdf.
- ¹⁵ Discord, “Non-Consensual Adult Intimate Media Policy Explainer,” *ibid*.
- ¹⁶ Kat Tenberge, “Found Through Google, Bought with Visa and Mastercard: Inside the Deepfake Porn Economy,” *NBC News*, March 27, 2023, <https://www.nbcnews.com/tech/internet/deepfake-porn-ai-mr-deep-fake-economy-google-visa-mastercard-download-rcna75071>.
- ¹⁷ NCOSE, “Time’s Up for Telegram Ignoring Image-Based Sexual Abuse,” *National Center on Sexual Exploitation*, November 16, 2022, <https://endsexualexploitation.org/telegram>.
- ¹⁸ Federal Bureau of Investigation (FBI), “Violent Online Groups Extort Minors to Self-Harm and Produce Child Sexual Abuse Material,” Public Service Announcement, September 12, 2023, <https://www.ic3.gov/Media/Y2023/PSA230912>.
- ¹⁹ Tenberge, *ibid*.
- ²⁰ Discord, “Points,” Discord App Directory, accessed March 25, 2024, <https://discord.com/application-directory/484395597508509697>.
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- ²² Tenberge, *ibid*.
- ²³ “Discord Community Guidelines,” Discord, last modified March 15, 2024, <https://discord.com/guidelines>.
- ²⁴ “Big Tech and the Online Child Sexual Exploitation Crisis,” (written testimony of Jason Citron), *ibid*.
- ²⁵ National Center on Sexual Exploitation, “Discord: A Mainstream Contributor to Sexual Exploitation,” *The Dirty Dozen List 2023*, accessed March 25, 2024, <https://endsexualexploitation.org/discord>.
- ²⁶ “Discord Community Guidelines,” *ibid*.
- ²⁷ eSafety Commissioner, *ibid*.
- ²⁸ “Age-restricted Server Designation,” Discord, last modified May 31, 2022, <https://support.discord.com/hc/en-us/articles/1500005389362-Age-restricted-Server-Designation>.
- ²⁹ Jenny S. Radesky, et al., *Constant Companion: A Week in the Life of a Young Person's Smartphone Use* (San Francisco, CA: Common Sense, 2023), https://www.common Sense Media.org/sites/default/files/research/report/2023-cs-smartphone-research-report_final-for-web.pdf.
- ³⁰ Thorn and Benenson Strategy Group, *ibid*.
- ³¹ eSafety Commissioner, *ibid*.