

#### Established 1962

PATRICK A. TRUEMAN, J.D. | Board Member

DAWN E. HAWKINS

Chief Executive Officer

BENJAMIN W. BULL, J.D.

Sr. Vice President & General Counsel

#### **BOARD MEMBERS**

RON DEHAAS | Chairman

Founder & CEO, Covenant Eyes

DAN O'BRYANT, J.D. | Vice Chairman Former Fellow, Weatherhead Center for International

Affairs, Harvard University RHONDA GRAFF | Secretary

Former Aerospace Program Manager/industrial Engineer

KEN SUKHIA, J.D. | Treasurer

Trial and Appellate Lawyer, Sukhia Law Group, PLC

HADLEY ARKES, PH.D.

Ney Professor of Jurisprudence, Emeritus,

Amherst College

BETH COONS Chairman, Farnsworth Companies

JOHN FOUBERT, PH.D.

Dean, College of Education, Union University

ROBERT GEORGE, PH.D.

McCormick Professor of Jurisprudence.

Princeton University

DONALD L HILTON, M.D.

Neurosurgeon, University of Texas - San Antonio

DONNA M. HUGHES, PH.D.

Professor, Carlson Endowed Chair, University of Rhode Island

AMBASSADOR SWANEE HUNT

Chair and Founder, Hunt Alternatives; Eleanor Roosevelt Lecturer of Public Policy, Harvard Kennedy School of Government

MARY ANNE LAYDEN, PH.D.

Director, Sexual Trauma and Psychopathology Program,

University of Pennsylvania

MOST REVEREND PAUL S. LOVERDE

Bishop, Dioceses of Arlington, VA, Retired

National Regent, Catholic Daughters of the Americas

KINDSEY PENTECOST

President, ItWorks! International

MARGARET RUCKS

Managing Director, Rucks Family Foundation ALAN SEARS, ESO.

Former President and CEO, Alliance Defending Freedom

LINNEA W. SMITH, M.D.

MELEA STEPHENS, L.P.C., M.M.F.T.

Marriage and Family Therapist

CAROLYN WEST, PH.D.

Professor of Clinical Psychology University of Washington

JUSTICE MICHAEL J. WILKINS

Former Associate Chief Justice, Utah Supreme Court

April 28, 2023

Daniel Ek Co-Founder and CEO, Spotify 4 World Trade Center 150 Greenwich Street, 62nd Floor New York, NY 10007

# Re: Spotify named to 2023 Dirty Dozen List for facilitating sexual exploitation

Dear Mr. Ek.

We are writing to inform you that the National Center on Sexual Exploitation—a non-partisan nonprofit organization in Washington, DC dedicated to addressing the full spectrum of sexual exploitation is placing Spotify on the annual Dirty Dozen List – a campaign that names 12 mainstream contributors to sexual exploitation and abuse. This year's Dirty Dozen List will be revealed on Tuesday, May 2, 2023.

Multiple child safety advocates and parents have also been elevating the problematic content on Spotify for years. Just in the past few months:

- Survivor-advocate and influencer Catie Reay released a TikTok urgently warning parents and minors about sexual grooming on Spotify and calling on your company to address the problems<sup>1</sup>
- Bark, a leading resource for online child safety, warned parents of the "large selection of pornographic content" on Spotify which was easily discoverable and frequently missed by Spotify's explicit content filter<sup>2</sup>
- Leading child online safety expert Chris McKenna at Protect  $\Rightarrow$ Young Eyes attested to receiving "multiple messages from parents about Spotify's explicit content weaknesses" and explained how innocent searches for children's music led to being "inundated with raunchy content"<sup>3</sup>
- The story of an 11-year-old girl being groomed by a predator on Spotify made headlines on multiple mainstream news outlets such as the <u>DailyMail</u><sup>4</sup> and the <u>BBC</u>.<sup>5</sup> In light of this incident, a Stockport

MP called on the UK government to expand the scope of its Online Safety Bill to include streaming platforms like Spotify.<sup>6</sup>

Families have been asking NCOSE with increasing frequency to look into the ease with which their children can access visual, written, and audio pornography on Spotify. And a significant number of caregivers leaving Spotify reviews on Common Sense Media have shared stories about their children's exposure to harmful content and frustration at what they perceive to be inadequate and deceptive content controls.<sup>7</sup>

Having conducted our own research and pressure-tested Spotify's policies and safety tools, NCOSE has concluded that much more proactive enforcement and moderation of prohibited content is required, along with improved filtering options. Further, we were dismayed at the lack of clear, accessible reporting procedures for child sexual exploitation, especially considering the recent mainstream news coverage of an 11-year-old girl being exploited on your platform.

We warmly thank Spotify for its industry-leading move in creating a "Spotify for Kids," which we think is indeed well designed and moderated. However, serious problems remain with the main Spotify app, which you still market to children. Spotify's guide for parents and guardians states, "We have designed Spotify to be appropriate for listeners 13+ years of age." Unfortunately, Spotify's practices don't live up to that promise. And it is because Spotify is expected to be a safe platform that it is named to the 2023 Dirty Dozen List—which educates on harm that is facilitated by mainstream companies people may not expect.

We ask you to consider our recommended changes for improving the safety of your platform, explained throughout this letter, and we welcome further discussion of these issues. Our key requests for improved safety on Spotify are as follows:

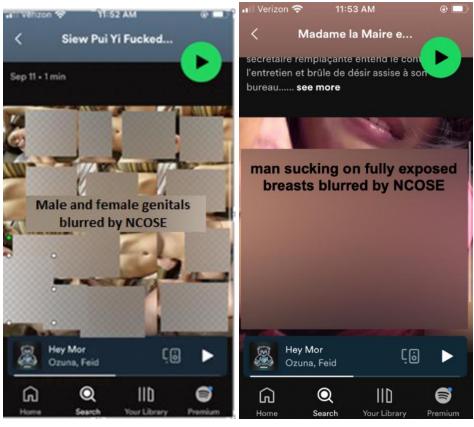
- 1. Improve measures to proactively detect and remove prohibited content
- 2. Improve measures to proactively detect grooming and child sexual exploitation and promptly remove all users who engage in this behavior and all content used in grooming cases
- 3. **Implement a reporting category for child sexual exploitation** and make reporting procedures easily accessible from both the mobile and desktop apps, for all types of content
- 4. Improve measures to proactively detect and filter any content which is inappropriate for teens; these measures should apply to all types of content, whether images (including profile images), text, or audio
- 5. Develop filtering options that include different levels/age-ratings or different content categories
- 6. **Default all safety settings** and only enable caregivers to change these settings on a minor's account (including for free accounts)

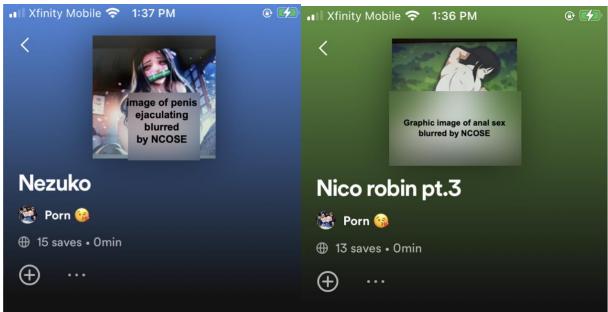
## Poor Enforcement of Spotify's Platform Rules

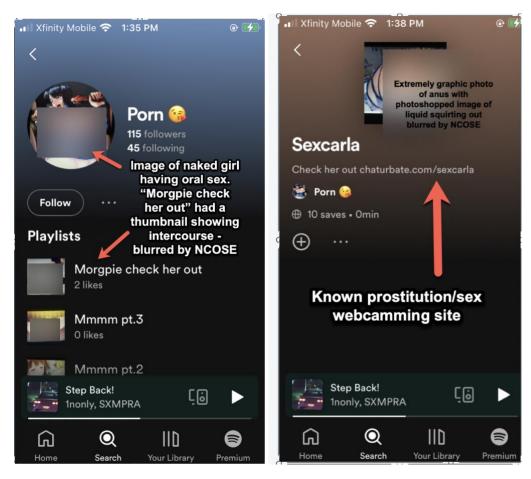
Spotify's Platform Rules prohibit "sexually explicit content," which you say "includes but may not be limited to pornography or visual depictions of genitalia or nudity presented for the purpose of sexual gratification," as well as "advocating or glorifying sexual themes related to rape, incest, or beastiality." However, despite these policies, such content is easily found on Spotify and is rarely even marked as explicit. The following are only a few examples of prohibited content that NCOSE researchers were able to easily find on a 13-year-old account.

We have blurred all sexually explicit images, a courtesy Spotify does not offer the user.

"Pornography or visual depictions of genitalia or nudity presented for the purpose of sexual gratification."





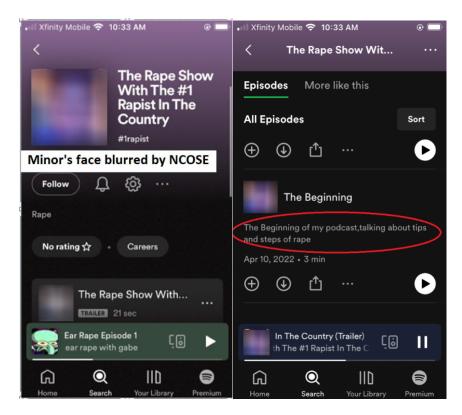


In addition to sexually explicit thumbnails, Spotify is littered with audio and written pornography (proof included later). It is not entirely clear whether Spotify's definition of "pornography" encompasses such content. This letter proceeds under the assumption that it does not, so the matter of audio and written pornography will be addressed later on when discussing Spotify's explicit content filter. However, if Spotify's sexually explicit content ban *does* extend to audio and written content, then we urge much stronger enforcement to proactively detect and remove this material.

## "Advocating or glorifying sexual themes related to rape, incest, or bestiality."

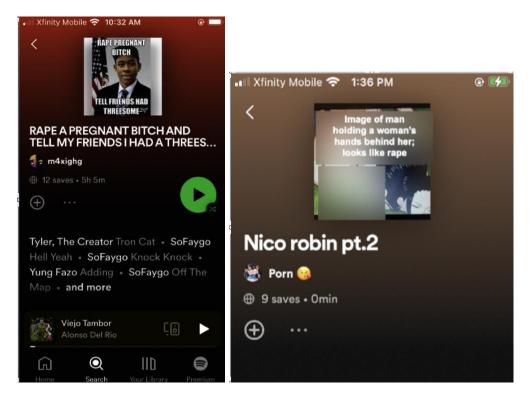
NCOSE researchers were deeply disturbed by the horrific content we found easily on Spotify which normalized, trivialized, and even encouraged rape. This content was easy to find, and we even stumbled on it by searching innocuous terms like "rap" and "boy."

For example, we found a podcast called "The Rape Show With The #1 Rapist In The Country," which included tips on how to commit rape and how not to get caught by the authorities.

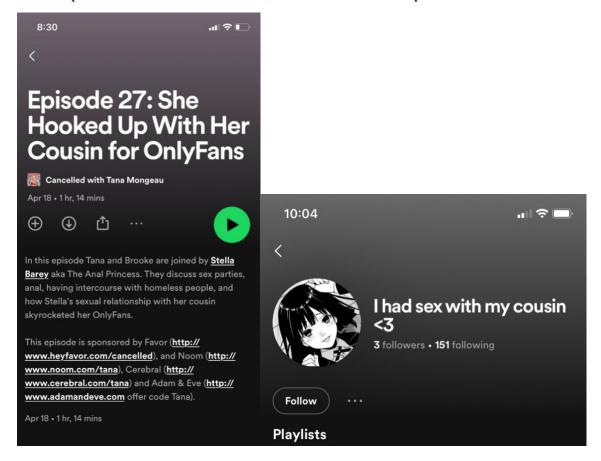


The voice in the podcast is of a young child. It is possible that the podcast may be a "joke," but it is the furthest thing from funny.

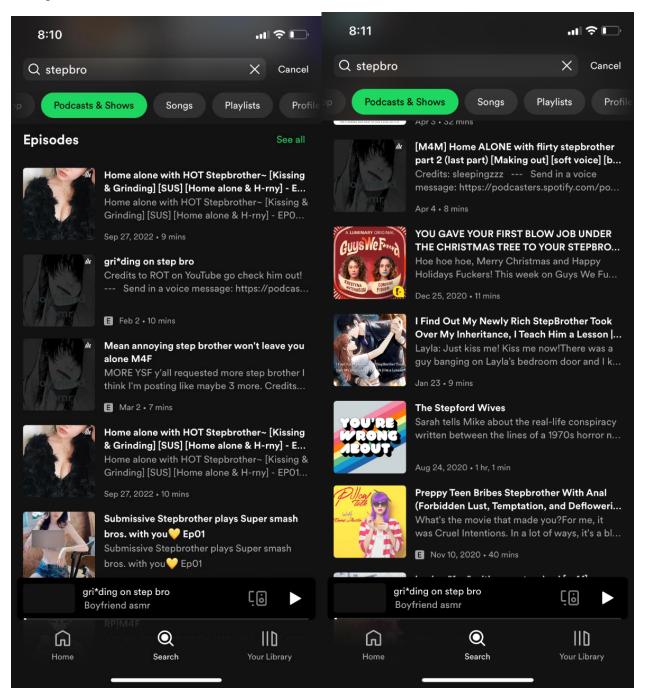
Further content normalizing or trivializing rape is shown below. The first image surfaced in a search for "rap," indicating how easy it is to come across this horrific content. Imagine being a kid stumbling on this content while looking for rap music, or a rape survivor looking for healing podcasts and being subsequently re-traumatized by the material below.

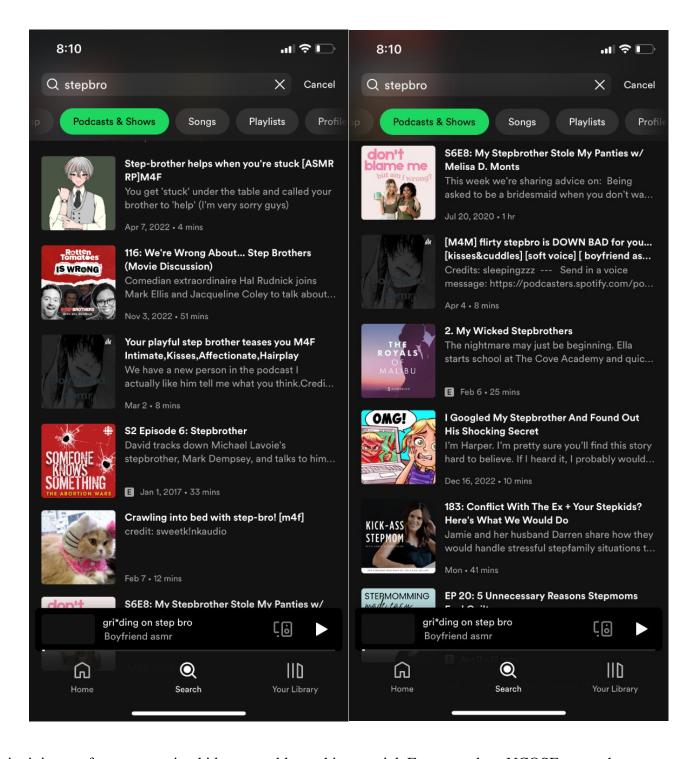


With respect to normalization of incest, below are a few examples of content NCOSE researchers found.

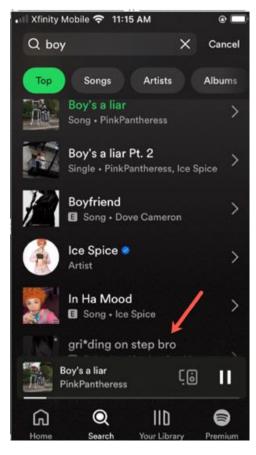


We also very easily found content on Spotify that participated in a trend of "step" incest, which has been normalized by pornography. A search for "stepbro" instantly pulls up an abundance of such content to scroll through.





Again, it is easy for unsuspecting kids to stumble on this material. For example, a NCOSE researcher was intending to search the song "Boy's a liar," which is very popular with teens. They only needed to type the word "boy" to be led to step- incest in the results. This was done on a newly made account for a 13-year-old, so search history was not yet affecting results.



"Content that promotes, solicits, or facilitates child sexual abuse or exploitation."

Under its policies on <u>"Dangerous Content,"</u> Spotify also prohibits "content that promotes, solicits, or facilitates child sexual abuse or exploitation." <sup>10</sup>

Unfortunately, when a NCOSE researcher searched for "porn" on Spotify, one of the first results was an audio pornography podcast for which the thumbnail was a topless girl on a bed who was almost certainly underage. This content was reported to the National Center for Missing and Exploited Children (NCMEC) and the Canadian Center for Child Protection (C3P). NCOSE also reported the content to Spotify, at which point we found that the process for reporting child sexual exploitation on Spotify was incredibly inaccessible and confusing for the average user (discussed in more detail later).

You will also be aware that a case of an 11-year-old girl being groomed and sexually exploited on Spotify recently made news headlines. Sexual predators communicated with the young girl via playlist titles and encouraged her to upload numerous sexually explicit photos of herself as the cover image of playlists she made. They also exchanged emails via this method of communication.

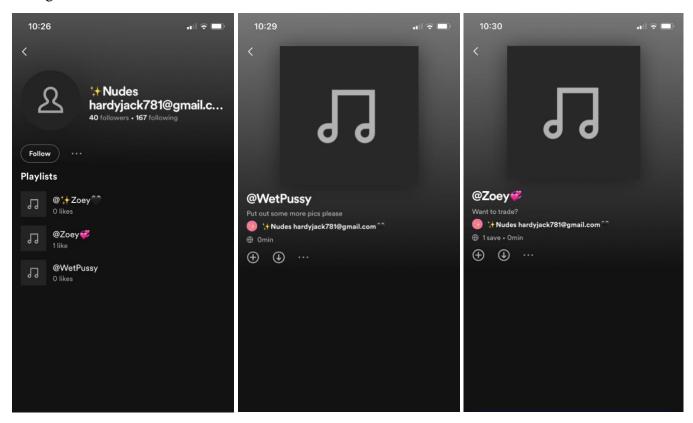
The exploitation continued for a period of six months before Spotify detected that one of the girl's playlists violated their terms and conditions. Spotify then proceeded to remove the single playlist—which we are grateful for. But numerous other child sexual abuse images of the girl remained on Spotify, to be later discovered by the girl's mother. The mother stated that she had to report the content "multiple times" before it was finally deleted by Spotify.<sup>11</sup>

Further, it is not clear that Spotify made any effort to identify the groomers and ban them from the platform upon identifying the violating playlist.

These are insufficient responses to a matter as grave as child sexual exploitation.

Survivor-advocate <u>Catie Reay recently released a TikTok</u> showing evidence of grooming on Spotify, such as **playlists that tag other users and ask them to send sexually explicit content of themselves**. This TikTok was made at the request of one of Catie Reay's followers, whose daughter was groomed on Spotify in this way.<sup>12</sup>

NCOSE researchers very easily found several suspicious Spotify profiles which may be dedicated to the soliciting or sharing of nudes. One of the profiles shared an email address and tagged other users in playlists, asking them to send nudes.





Considering the recent case of grooming, it is concerning that Spotify is not taking more action to prevent the soliciting of nudes. We urge Spotify to improve its measures to proactively detect grooming and child sexual exploitation, and promptly ban all users who engage in such behaviors.

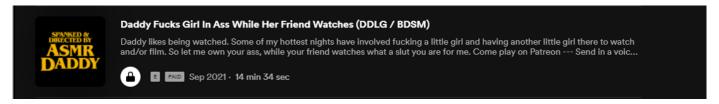
In addition to indisputable cases of real child sexual exploitation, NCOSE found a plethora of content in which it was not clear whether real child sexual abuse was involved, but which certainly normalized and fetishized child sexual abuse. We believe that, regardless of whether a real child was involved, such material still falls under this category of prohibited content; Spotify explains that the category includes "encouraging or promoting sexual attraction by adults towards minors," and we argue that this can be done through the fetishization of child sexual abuse, real or enacted. <sup>13</sup> To fantasize about/enact child sexual abuse for the purpose of arousal is to paint child sexual abuse as "sexy" and arousing.

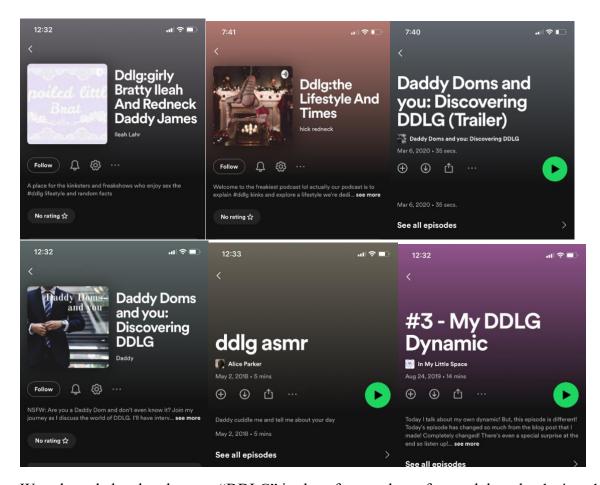
Below is an example of an audio pornography podcast NCOSE found which depicted child sexual abuse.

(translation: "He's not your son anymore! When the whole barracks attends the anal preparation of her child by her supervisor")



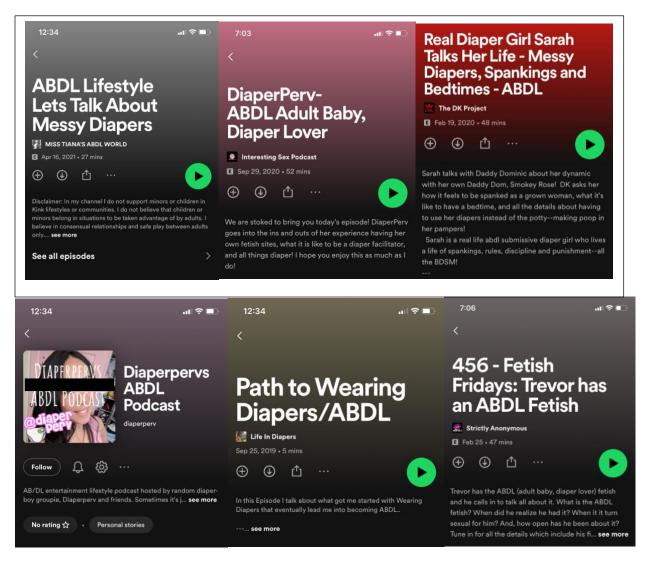
Further, we found a number of pornography podcasts labelled with the term "DDLG" (Daddy Dom Little Girl), which is **well-known among sex trafficking investigators as an indicator of potential child sexual abuse material.**<sup>14</sup>





We acknowledge that the term "DDLG" is also often used to refer to adults role playing child sexual abuse, in addition to real CSAM. However, again, we argue that this content still warrants being banned because of how it fetishizes and normalizes child sexual abuse. It is worth noting that **even well-known pornography websites like Pornhub and OnlyFans include the term "DDLG" in their list of banned words** (despite this list being poorly enforced). A search for "DDLG" on Pornhub will not yield results, but instead directs users to a warning that the content they're seeking may be illegal and a referral to where they can get help for sexual attraction to children.

In a similar vein, our team also found a plethora of "ABDL" (Adult Baby/Diaper Lover) content on Spotify. This is another term denoting the role playing of child sexual abuse—specifically the sexual abuse of infants.



As the above evidence shows, Spotify is not doing enough to enforce its platform rules. We acknowledge that Spotify has been known to take down prohibited content in response to reports, but **given the extent of prohibited material on the platform, more needs to be done to proactively detect and prevent this content from being uploaded.** Further, there is much that Spotify can do to improve its reporting process, especially with respect to the reporting of child sexual exploitation.

## No Clear, Accessible Report Procedure for Child Sexual Exploitation

In response to the grooming scandal, a Spotify spokesperson stated:

Spotify takes the safety of minors on our platform extremely seriously, and we do not allow content that promotes, solicits, or facilitates child sexual abuse or exploitation. We have processes and technology in place that allow us to detect and remove any such exploitative material.<sup>15</sup>

Given this statement—and the fact that child sexual exploitation on Spotify has been making headlines—NCOSE was shocked to discover that Spotify does not have what would seem to be a bare minimum feature: clear, accessible reporting procedures for child sexual exploitation.

When a NCOSE researcher discovered what appeared to be CSAM on Spotify, they proceeded to attempt to report it to the platform. What ensued was an incredibly confusing experience that is likely to be experienced by an average user attempting to report child sexual exploitation.

Googling questions such as "how to report child pornography on Spotify" and "how to report child sexual exploitation on Spotify" **brought the researcher to no helpful information**. After trying many queries like this, eventually a Google search of "report content on Spotify" brought the researcher to a <u>Spotify webpage</u> with instructions on how to report "infringing, illegal, or hate content." The page specifically stated that you could report images this way. However, **upon trying out Spotify's instructions, the researcher found that they did not work.** After a long while of testing, they eventually determined that the in-app reporting feature was only available for playlists, audiobooks, artists, and profiles, but **not for podcasts, albums, and songs.** This is extremely problematic, not only because this specific case of CSAM was the thumbnail for a podcast, but because a large percentage of the concerning content we highlighted in this letter was in **podcast form.** 

Finally, NCOSE researchers found an <u>online form for reporting content on Spotify</u>—but saw that there was **no reporting category for child sexual exploitation, or even for illegal content** (this is likely the reason why users searching for "report child sexual exploitation" and the like did not turn up any helpful results – a serious barrier to users attempting to report this type of content).<sup>17</sup>

It was not clear which of the categories on the form it would be appropriate to report CSAM under. Fortunately, the researcher had previously spent time reading through Spotify's policies for this letter and consequently knew that Spotify categorized child sexual exploitation under "Dangerous Content." As such, the researcher presumed they should report under "Violent or dangerous." However, the average Spotify user trying to report child sexual exploitation would not have the advantage of previously spending multiple hours researching Spotify's policies to help them determine this.

Upon filling out the form, the researcher was utterly dismayed to find that there was **no option to write more details on the report.** As such, given that Spotify had not provided a reporting category for child sexual exploitation, **there was no way for the researcher to indicate to Spotify that they were reporting CSAM.** This information is of critical importance to Spotify, for the purpose of prioritizing reports and knowing what to look for in the content.

We urge Spotify to implement a reporting category for child sexual exploitation and to make reporting procedures easily accessible from both the mobile and desktop apps, for all types of content.

## The Inadequacy of Spotify's Explicit Content Filter

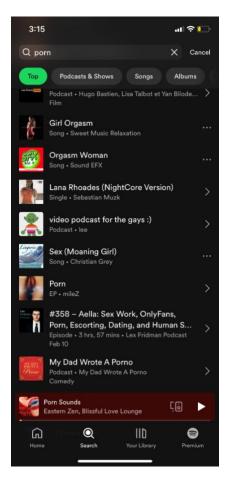
In <u>A Guide to Spotify for Parents and Guardians</u>, your company claims that "content which may not be appropriate for teens is marked with an 'Explicit Content' or 'E' label." While we thank Spotify for having an explicit content filter, upon testing the tool, NCOSE researchers very quickly found it to be extremely inadequate and inconsistent. For example, while a reasonable number of songs that contained swear words were marked explicit, the *majority* of sexually graphic content we found on Spotify (whether visual, audio, or written) was *not* marked explicit.

We understand that Spotify applies the explicit content tag based on information it receives from rights-holders. This system is clearly broken and is not coming anywhere close to meeting reasonable expectations

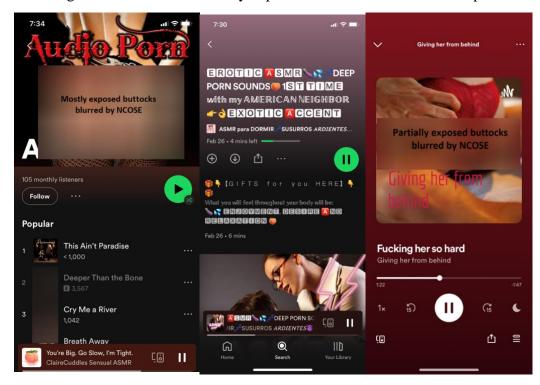
parents/caregivers would have, especially when Spotify's guide assures them the filter will block "content which may not be appropriate for teens."

Below are screenshots of NCOSE researchers scrolling through the first results after searching for the word "porn" on a newly made 13-year-old Spotify account. Notice that *only twice* in all these results is content marked explicit. Occasionally, when clicking on a pornography podcast/playlist, individual episodes or songs were marked explicit, but the majority still weren't (we invite you to test this for yourself).

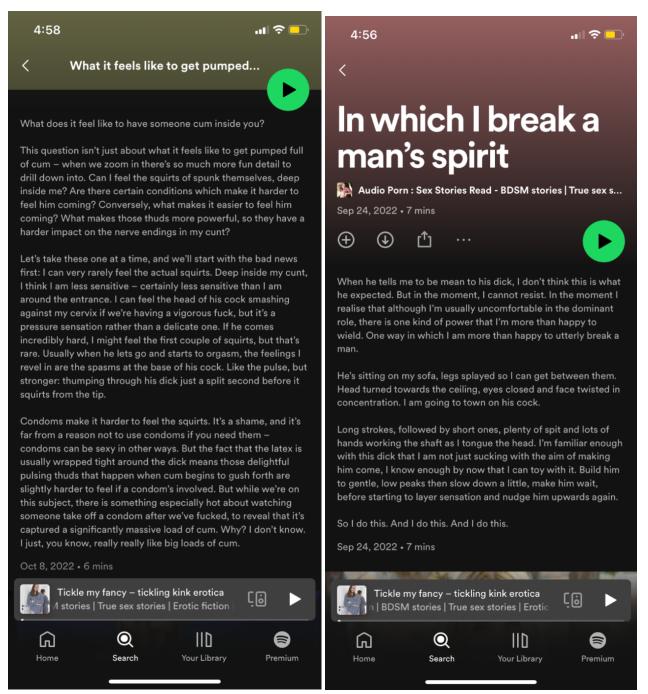


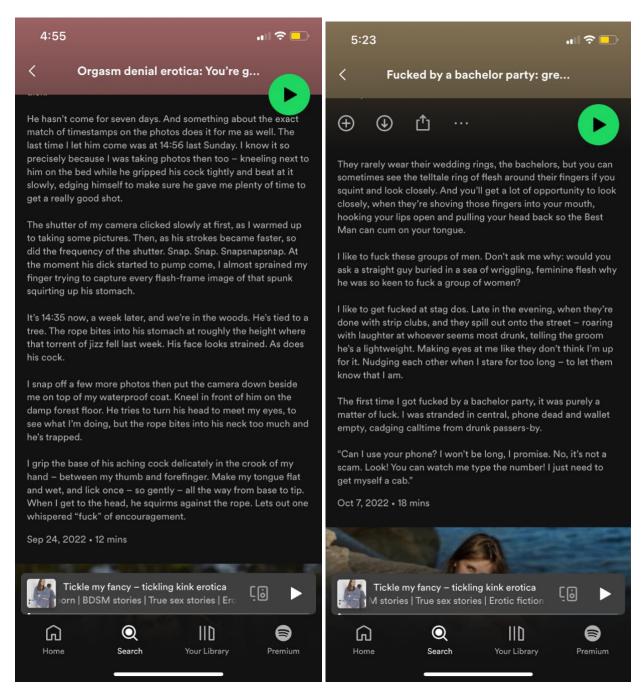


A large percentage of these results were of audio pornography which, as we have mentioned, either contain recordings of sex sounds or sexually explicit stories read aloud. A few specific examples are shown below.



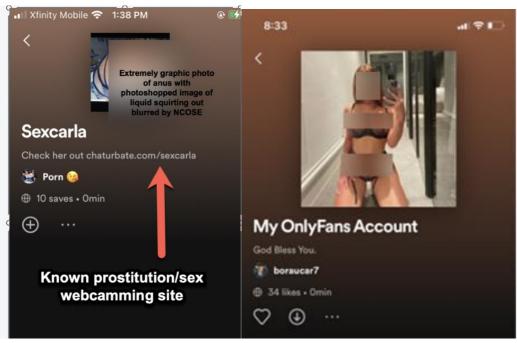
In addition to audio content, the descriptions for these results sometimes contained very graphic written pornography.

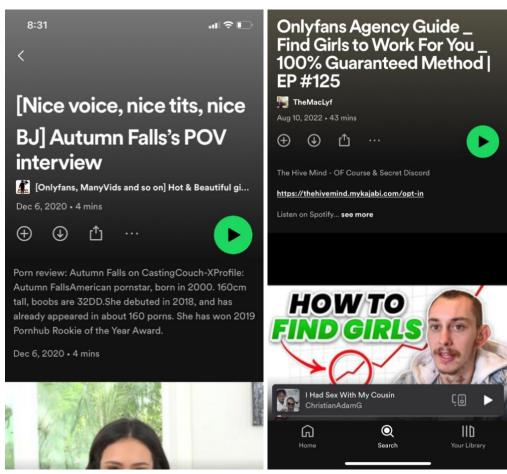


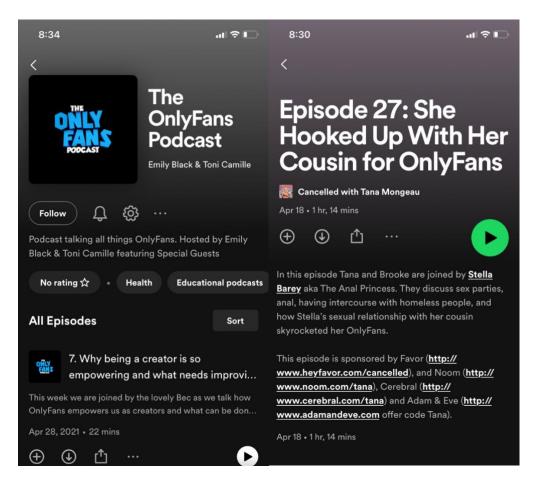


If Spotify judges that audio and written pornography should not be encompassed by the platform's sexually explicit content ban (a dubious choice), then it is absolutely imperative that such content be caught by the explicit content filter.

We also found that some of the content promoting external pornography and prostitution websites, such as OnlyFans and chatturbate.com, was not marked explicit. A filter which claims to block content that is inappropriate for teens should not be allowing promotion of pornography and prostitution websites.







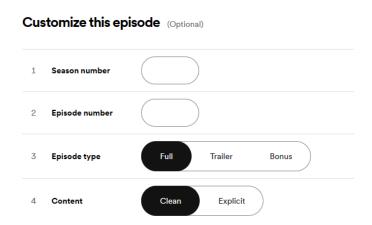
Spotify needs to do much more to proactively detect and filter content which is inappropriate for teens. These measures should apply to all types of content, whether images (including profile pictures, which is where NCOSE found much of the sexually explicit imagery), text, or audio.

We also recommend that Spotify develop filtering options that include **different levels/age-ratings or different content categories**. There is precedence for this on other social media and streaming platforms. The benefit to this approach is that it would allow parents/caregivers to protect their children from the most harmful content or the types of content they are most concerned about, without being overly restrictive for older children. For example, one parent who spoke to NCOSE expressed her frustration that Spotify **did not have an option to "block x rated podcasts if I allow my teens to listen to songs with a mild swear word like 'damn'. It's all or nothing, Spotify for a six-year-old or an adult."** Without different levels for filters, teens and their parents may become frustrated with how restrictive the current filter can be and may lift it for that reason, without realizing that this presents risk of exposure to much more egregious content.

We recognize that some of our requested changes require effort and time, so as a temporary measure, we would like to suggest some **very easy fixes that Spotify can implement immediately**:

1. **Update the explicit content filter to hide thumbnails and descriptions from view.** As demonstrated by the screenshots included throughout this letter, very often the thumbnails and descriptions are explicit or age-inappropriate themselves. When a user opts to block explicit content, the thumbnails and descriptions for all content marked with an "E" should be blurred.

2. Prevent creators and artists from uploading/distributing content on Spotify until they mark whether it is appropriate for teens. Currently, marking content as explicit or clean is an optional feature that is easily missed. One NCOSE researcher had used Spotify for Podcasters before and never even noticed that there was an option to mark the content clean or explicit, as it is at the very bottom of the page in an "optional" section.

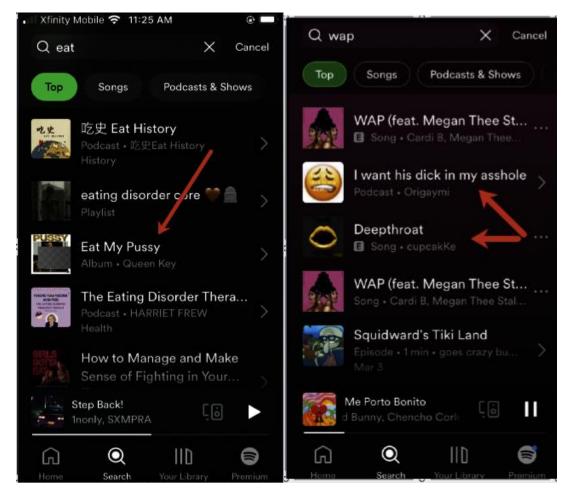


Rather than this system, users should be prevented from completing their upload/distribution to Spotify until they answer the question "Is your content appropriate for 13-year-olds?" Asking this question is more suitable than having the user select "clean" or "explicit" because, again, Spotify's guide for parents and guardians states that the explicit filter blocks "content which may not be appropriate for teens." **This question should also be asked when users are uploading a profile image**, as again, much of the sexually explicit imagery NCOSE found was in profile photos.

## The Importance of Defaulting to Safety

Currently, the default setting on Spotify is that explicit content is *allowed*, even for minor accounts. <u>As</u> research shows that most people leave devices and apps at their default settings, this approach puts children directly in harm's way.<sup>19</sup>

It is not difficult for children to stumble on sexually graphic content on Spotify. Recall how we previously showed a search for "rap" and "boy" led NCOSE researchers to content glorifying rape and incest. Below are a couple other examples of NCOSE researchers searching songs that are popular with teens ("Eat Your Young" and "WAP") and being served highly sexual content (in the first case, only the first word "eat" was typed before sexual content was served). Again, these results were from a newly made 13-year-old account, so results were not affected by search history.



Further, a <u>2022 article by Vice</u> argues that the only reason for producers/creators of pornographic content to upload the material to Spotify is that people may stumble on their content unexpectedly:

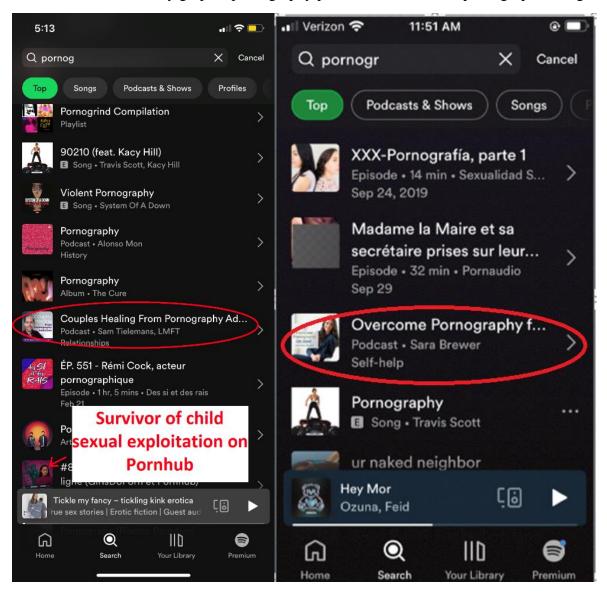
If you're a legitimate audio porn creator, there's only one compelling reason to upload your work to Spotify, where everything is free and the pay sucks ass: Visibility. Adult content that's not pushed off mainstream platforms—like how people use Twitter to market their Onlyfans—is a good thing for creators trying to be seen by adults who aren't necessarily looking for sexual content but might stumble into it.<sup>20</sup>

The above quote speaks of "adults" stumbling on this content, but there is nothing stopping it from happening to children as well.

Given all this, the result of not having safety tools on by default is that the only children who get protected are those with highly-involved, danger aware, tech savvy parents who can afford to spend hours navigating the various parental controls and safety settings on the numerous apps their child uses. The majority of children, and especially the most vulnerable (i.e., those without the privilege of involved parents), are left completely exposed to harm.

We therefore implore Spotify to activate its explicit content filter (and any other safety tools it develops) by default, at the very least on minor accounts. Preferably, this would be the default for accounts of all ages, as children have been known to regularly lie about their age when creating online accounts, and even adults

should not be bombarded with unsolicited explicit content. This is arguably a form of sexual harassment. It is also potentially triggering for survivors or people trying to overcome pornography addiction—podcasts interviewing survivors of exploitation in the porn industry and/or podcasts about overcoming pornography were often surrounded by graphic pornography podcasts that included pornographic images.



Activating the explicit content filter by default for accounts of all ages would avoid all these issues, and consenting adults who wish to see explicit content could still easily change the setting if they so choose.

It should also be the case that only a caregiver can control the explicit content settings for a minor's account. We warmly thank Spotify for providing this type of parental control through the Premium Family Subscription; however, we believe it is problematic that it is not available on free accounts. We understand that Spotify is a business and needs ways to incentivize people to purchase premium plans—but we do not believe that putting vulnerable children at risk is an acceptable business strategy. Child protections on a 13+ platform should not be limited to privileged children whose caregivers can afford premium subscriptions.

We thank you for considering our concerns and recommended solutions. Should you wish to reach out to us for further discussion, we welcome your contact.

Respectfully,

Daw Hawkuns

Patrick Trueman, Esq. Dawn Hawkins

President CEO

Cc:

Alex Norström, Co-President and Chief Business Officer

Gustav Söderström, Co-President and Chief Product & Technology Officer

Eve Konstan, General Counsel

https://www.commonsensemedia.org/website-reviews/spotify/user-reviews/adult.

<sup>&</sup>lt;sup>1</sup> Catie Reay (@thetiktokadvocate), "PSA for parents with minors using Spotify!!! When we say it's happening everywhere... We literally mean EVERYWHERE," TikTok, January 3, 2023,

 $<sup>\</sup>frac{\text{https://www.facebook.com/}100009852761459/\text{videos/}1636483060138642/?\text{extid=CL-UNK-UNK-UNK-IOS\_GK0T-GK1C\&mibextid=}2Rb1fB.}{\text{GK1C\&mibextid=}2Rb1fB.}$ 

<sup>&</sup>lt;sup>2</sup> The Bark Team, "Spotify Has a Porn Problem — Here's What Parents Need to Know," *The Bark Blog*, January 27, 2023, <a href="https://www.bark.us/blog/spotify-porn-problem">https://www.bark.us/blog/spotify-porn-problem</a>.

<sup>&</sup>lt;sup>3</sup> Chris McKenna (@protectyoungeyes), "Spotify Has a Big Problem," Instagram, December 1, 2022, https://www.instagram.com/p/Clo64HtvEgF/?utm\_source=ig\_web\_copy\_link.

<sup>&</sup>lt;sup>4</sup> Danya Bazaraa, "Warning Over 'Sickening' Sexual Grooming on Spotify as Mother Reveals How Her 11-year-old Daughter was Tricked into Uploading Explicit Pictures by Paedophiles," *Daily Mail*, January 6, 2023, <a href="https://www.dailymail.co.uk/news/article-11606383/Warning-mother-says-11-year-old-daughter-tricked-uploading-explicit-photos-Spotify.html">https://www.dailymail.co.uk/news/article-11606383/Warning-mother-says-11-year-old-daughter-tricked-uploading-explicit-photos-Spotify.html</a>.

<sup>&</sup>lt;sup>5</sup> BBC News, "Claims Schoolgirl, 11, was Groomed on Spotify," *BBC News*, January 13, 2023, <a href="https://www.bbc.com/news/uk-england-manchester-64262918">https://www.bbc.com/news/uk-england-manchester-64262918</a>.

<sup>&</sup>lt;sup>6</sup> Ibid.

<sup>&</sup>lt;sup>7</sup> "Parent and Kid Reviews on Spotify," Common Sense Media, accessed April 22, 2023,

<sup>&</sup>lt;sup>8</sup> Spotify, A Guide to Spotify for Parents and Guardians (Spotify), <a href="https://www.spotify.com/privacy/files/Parental-Guide.pdf">https://www.spotify.com/privacy/files/Parental-Guide.pdf</a>.

<sup>&</sup>lt;sup>9</sup> "Spotify Platform Rules," Safety & Privacy, Spotify Support, accessed April 22, 2023, <a href="https://support.spotify.com/us/article/platform-rules">https://support.spotify.com/us/article/platform-rules</a>.

<sup>&</sup>lt;sup>10</sup> Ibid.

<sup>&</sup>lt;sup>11</sup> Bazaraa, ibid.

<sup>&</sup>lt;sup>12</sup> Reay, ibid.

<sup>&</sup>lt;sup>13</sup> "Spotify Platform Rules," ibid.

<sup>&</sup>lt;sup>14</sup> Anti-Human Trafficking Intelligence Initiative in Consultation with Veteran Law Enforcement Officials, *Expert Analysis of Open Source Material Relating to Child Sexual Abuse Material and Sex Trafficking Occurring on OnlyFans.com* (Anti-Human Trafficking Intelligence Initiative, April 2022), <a href="https://followmoneyfightslavery.org/expert-analysis-ofbropen-source-material-relating-to-child-sexual-abuse-material-and-sex-trafficking-occurring-on-onlyfans-com">https://followmoneyfightslavery.org/expert-analysis-ofbropen-source-material-relating-to-child-sexual-abuse-material-and-sex-trafficking-occurring-on-onlyfans-com</a>.

<sup>&</sup>lt;sup>15</sup> Bazaraa, ibid.

<sup>&</sup>lt;sup>16</sup> "Report Content," App Help, Spotify Support, accessed April 22, 2023, <a href="https://support.spotify.com/us/article/report-content">https://support.spotify.com/us/article/report-content</a>.

<sup>&</sup>lt;sup>17</sup> "Report Content on Spotify," Spotify Support, accessed April 22, 2023, <a href="https://support.spotify.com/us/content-policy-reporting">https://support.spotify.com/us/content-policy-reporting</a>.

<sup>&</sup>lt;sup>18</sup> Spotify, *A Guide to Spotify*, ibid.
<sup>19</sup> "By the Power of Default," *Center for Advanced Hindsight*, March 22, 2018, <a href="https://advanced-hindsight.com/blog/by-the-">https://advanced-hindsight.com/blog/by-the-</a>

power-of-default.

20 Samantha Cole, "What's Going On With the Hardcore Porn Images on Spotify?," *Vice*, July 26, 2022, <a href="https://www.vice.com/en/article/jgpm94/whats-going-on-with-the-hardcore-porn-images-on-spotify">https://www.vice.com/en/article/jgpm94/whats-going-on-with-the-hardcore-porn-images-on-spotify</a>.