



NATIONAL
CENTER ON
SEXUAL
EXPLOITATION

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April 3, 2024

Mr. Pavel Durov
CEO, Telegram Messenger
Business Central Towers, Tower A
Office 1003/1004, P.O. Box 501919
Dubai, United Arab Emirates

Re: Telegram's placement on the 2024 Dirty Dozen List for the facilitation of extensive sexual abuse and exploitation

Dear Mr. Durov:

The National Center on Sexual Exploitation—a non-partisan nonprofit organization based in Washington, DC dedicated to addressing the full spectrum of sexual exploitation—is placing Telegram on the annual Dirty Dozen List. The List features 12 mainstream facilitators of sexual exploitation and will be publicly released Wednesday, April 10, 2024.

Since its inception, [Telegram has served as an epicenter of extremist activities](#),¹ operating not only as a haven, but as a thriving ecosystem for the most egregious of crimes perpetuated by vast networks of perpetrators connected by your platform. Telegram allows and rapidly spreads every form of sexual abuse and exploitation ([and countless illegal activities](#))² – profiting from some of the most heinous acts imaginable. [Increasingly referred to as “the new dark web,”](#)³ Telegram has been a primary source and multiplier for the following:

- [Sadistic torture and sextortion rings](#) operated by pedophiles, and even children⁴
- [Pedophiles connecting to view, trade, and sell child sexual abuse material \(CSAM\)](#)⁵
- [Image-based sexual abuse creation and dissemination](#),⁶ including “revenge pornography” networks and [“nudifying” technology](#)⁷
- [Deepfake pornography development and monetization](#) – including of minors⁸
- [Sex trafficking](#)⁹ (including of children)¹⁰ and prostitution
- [Children having sexual interactions online, including with adults](#)¹¹
- [Selling of “date rape” drugs](#)¹²

Telegram is clearly aware of the extent of the crimes taking place on

the platform. Your app has been [banned in more than a dozen countries](#).¹³ India’s Ministry of Electronics and Information Technology (MEITY) [recently issued Telegram a notice demanding you remove CSAM, as well as the payment processors engaged in monetizing this illegal content at risk of losing protection from legal liability](#).¹⁴ [Law enforcement agencies](#),¹⁵ [nonprofit organizations](#),¹⁶ [cybersecurity analysts](#),¹⁷ and [investigative journalists](#)¹⁸ have been sounding the alarm about Telegram for years.

Telegram’s very design seems built to invite and protect criminals and predators, affording them a low-risk, high-reward environment in which to operate without fear of consequences. The [distributed infrastructure](#),¹⁹ end-to-end encryption for one-to-one calls and self-destructing “[Secret Chats](#),”²⁰ lack of age or consent verification, reliance on user reports and administrator oversight, vague classification of “private” versus “public” content, and astonishing lack of content moderation (or even policies) provide the perfect environment for massive exploitation. The Stanford Internet Observatory even concluded in a June 2023 report that [Telegram implicitly allows the trading of CSAM in private channels \(as there is no explicit policy at all against CSAM in private chats, sexualization of children, or grooming\) and does not detect for known CSAM](#) as researchers found the illegal content being traded openly in public groups.²¹

Furthermore, given that Telegram’s channels are designated for broadcasting to unlimited audiences (some containing tens of millions of members) and groups can have up to 200,000 members (and send/receive up to 2GB of any file type), instances of abuse and exploitation can and *are* shared rapidly and at scale.

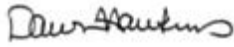
We could fill scores of pages with the research, investigative news pieces, survivor testimony, and our own collected evidence of the illegal activity, grave harms, and extreme trauma that Telegram hosts, enables, facilitates, perpetuates, and ignores. One only needs to conduct a simple Google search to obtain pages of proof for themselves.

As one of the top ten most popular apps in the world with over [1 billion downloads](#) from the Google Play Store²² and the fourth most popular social media app in the Apple App Store, reaching [800 million average monthly users](#),²³ what happens on Telegram is affecting millions of people. And not just Telegram’s own users – but the untold numbers of people being abused and exploited on and through your app without their knowledge, the countless families and communities devastated because of the crimes your app enables.

Normally, the National Center on Sexual Exploitation offers recommendations for improvement and invites constructive dialogue to develop solutions for making a platform free from sexual abuse and exploitation. However, we have no confidence that Telegram cares to engage with any entity, nor have you shown any substantive effort to-date to stem the rampant crime on the platform.

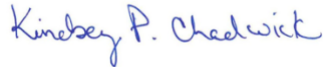
Telegram is so dangerous and such a threat to so many people that we believe it should be shut down. Unless you choose to radically change your platform, we believe it is our responsibility to publicly expose the extensive illegal activity and harm on your platform with policymakers, law enforcement, app stores, and the public.

Thank you for your attention,



Dawn Hawkins

CEO



Kindsey P. Chadwick

Interim President

Cc:

Nikolai Durov, Co-founder

Ilya Perekopsky, Vice President

¹ R.Y. Lazerson, “The Growing Security Threat from Alternative Platforms,” *Center for Security in Politics, University of California, Berkely*, May 16, 2023, <https://csp.berkeley.edu/2023/05/16/the-growing-security-threat-from-alternative-platforms>.

² Shigraf Aijaz, “Telegram: A Thriving Hub of Criminal Activity,” *United States Cybersecurity Magazine*, February 17, 2023, <https://www.uscybersecurity.net/telegram-a-thriving-hub-of-criminal-activity>.

³ Hannah Murphy, “Telegram: Social Media Giant or the New ‘Dark Web?’” *Financial Times*, March 12, 2024, <https://www.ft.com/content/c70ef7d6-230a-4404-b854-2e75fe0f2e0a>.

⁴ Mack Lamoureux, “The Vile Sextortion and Torture Ring Where Kids Target Kids,” *Vice*, February 20, 2024, <https://www.vice.com/en/article/7kxjnz/the-vile-sextortion-and-torture-ring-where-kids-target-kids>.

⁵ 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.

⁶ BBC, “Telegram: Why Won’t You Take My Nudes Down?” BBC Video, February 23, 2022, <https://www.bbc.com/reel/video/p0bqghsh0/telegram-why-won-t-you-take-my-nudes-down>.

⁷ Santiago Lakatos, “A Revealing Picture: AI-Generated ‘Undressing’ Images Move from Niche Pornography Discussion Forums to a Scaled and Monetized Online Business,” *Graphika*, December 8, 2023, <https://graphika.com/reports/a-revealing-picture>.

⁸ Santiago Lakatos, *A Revealing Picture: AI-Generated ‘Undressing’ Images Move from Niche Pornography Discussion Forums to a Scaled and Monetized Online Business* (Graphika, December 2023), <https://public-assets.graphika.com/reports/graphika-report-a-revealing-picture.pdf>.

⁹ Politiko, “NBI Nabs Chinese Linked To Sex Trade Via Telegram App,” *Politiko*, March 14, 2023, <https://politiko.com.ph/2023/03/14/nbi-nabs-chinese-linked-to-sex-trade-via-telegram-app/politiko-lokal>.

¹⁰ Communications Daily, “Suit Alleges Telegram, Scruff Ignore Sexual Trafficking of Kids on Their Platforms,” *Communications Litigation Today*, June 9, 2023, <https://communicationslitigationtoday.com/article/2023/06/09/suit-alleges-telegram-scruff-ignore-sexual-trafficking-of-kids-on-their-platforms-2306080052>.

¹¹ 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.

¹² Sanya Burgess, “Facebook, Instagram, X and Telegram Fail to Remove Posts Selling Date Rape Drugs,” *i News*, March 5, 2024, <https://inews.co.uk/news/facebook-instagram-x-telegram-date-rape-posts-2935896>.

¹³ “Government censorship of Telegram,” Wikipedia, last modified March 25, 2024, https://en.wikipedia.org/wiki/Government_censorship_of_Telegram.

¹⁴ IANS, “YouTube, Telegram Respond to IT Ministry’s Notice on Child Sexual Abuse Material,” *The Economic Times India*, October 7, 2023, https://economictimes.indiatimes.com/tech/technology/youtube-telegram-respond-to-it-ministrys-notice-on-child-sexual-abuse-material/articleshow/104238272.cms?utm_source=contentofinterest&utm_medium=text&utm_campaign=cppst.

¹⁵ United States Attorney’s Office Southern District of Indiana, “Fishers Man Sentenced to 13 Years in Federal Prison for Trafficking Child Sexual Abuse Material Via Omegle, Kik, and Telegram,” news release, February 6, 2023, <https://www.justice.gov/usao-sdin/pr/fishers-man-sentenced-13-years-federal-prison-trafficking-child-sexual-abuse-material>.

¹⁶ Insoll, et al., *ibid*.

¹⁷ David Thiel, Renée DiResta, and Alex Stamos, *Cross-Platform Dynamics of Self-Generated CSAM* (Stanford Internet Observatory, June 2023), <https://stacks.stanford.edu/file/druid:jd797tp7663/20230606-sio-sg-csam-report.pdf>.

¹⁸ Global Disinformation Team, “Telegram: Where Women’s Nudes are Shared Without Consent,” *BBC*, February 15, 2022, <https://www.bbc.com/news/world-60303769>.

¹⁹ Telegram, “Q: Do you process data requests?” Telegram FAQ, accessed March 25, 2024, <https://telegram.org/faq?setln=en#q-do-you-process-data-requests>.

²⁰ Telegram, “Secret Chats,” Telegram FAQ, accessed March 25, 2024, <https://telegram.org/faq?setln=en#secret-chats>.

²¹ Thiel, DiResta, and Stamos, *ibid*.

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