



NATIONAL CENTER ON SEXUAL EXPLOITATION

September 21, 2022

Mr. D. James Bidzos, Chairman and Chief Executive Officer
Verisign, Inc.
12061 Bluemont Way
Reston, VA 20190

Dear Mr. Bidzos:

The National Center on Sexual Exploitation is a Washington, DC-based non-profit organization dedicated to ending all forms of sexual exploitation including sex trafficking and the online distribution of child sexual abuse material (CSAM). Thus, we were encouraged to see on Verisign's website, under the heading "Keeping the Domain Name System Safe," the statement, "At Verisign, we are committed to contributing to a secure, stable, and resilient internet. We take our responsibilities seriously, and that means being committed to addressing Domain Name System (DNS) abuse **at the registry level.**" [emphasis added]. We were also encouraged to learn that Verisign entered into a "trusted notifier relationship with the Internet Watch Foundation (IWF), under which we are committed to taking action against every .com, and .net domain name reported to us by IWF as being used to host CSAM-related content."¹

We are writing to bring to Verisign's immediate attention two .com domain names, under which websites are currently operating, that host and profit from CSAM content: **pornhub.com and xvideos.com**. Both websites and their operators are currently subject to federal civil lawsuits concerning the distribution of CSAM. The plaintiffs in these lawsuits are survivors of child sexual abuse who have suffered because their abuse was hosted and distributed internationally via these .com websites.²

The extensive abuses occurring on pornhub.com and xvideos.com were featured in two separate *New York Times* investigative pieces³ by Pulitzer Prize winning journalist, Nicholas Kristof. Multiple mainstream corporations have cut ties with both pornography sites. Credit card companies Visa and Mastercard ceased processing payments for Pornhub in 2020 (PayPal in 2019), as well as for TrafficJunky—the advertising arm of Pornhub's parent company, MindGeek. Kraft-Heinz and Unilever stopped running ads on Pornhub, and Roku and Comcast stopped distributing Pornhub content. Instagram recently removed Pornhub's account for "violating community guidelines." Mastercard and Visa also cut ties with XVideos' advertising

¹ Verisign.com, https://www.verisign.com/en_US/company-information/dns-abuse/index.xhtml.

² See https://endsexualexploitation.org/wp-content/uploads/Doe-v.-MindGeek_Complaint.pdf and https://endsexualexploitation.org/wp-content/uploads/Xvideos-complaint-as-filed_Jane-Doe-v.-WebGroup-Czech-Republic-et-al_03-18-2021.pdf.

³ Nicholas Kristof, "The Children of Pornhub," *New York Times*, December 4, 2020, <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>; Adam Westbrook and Lindsay Van Dyke, "Why Do We Let Corporations Profit From Rape Videos?" *New York Times*, April 16, 2021, <https://www.nytimes.com/2021/04/16/opinion/sunday/companies-online-rape-videos.html>.

arm (Traffic Factory) and Mastercard ceased payments for XVideosRED (premium) this past August.

We urge Verisign to cut ties with these criminal enterprises by, at the registry level, suspending and canceling the domain names pornhub.com and xvideos.com. Verisign should lock these domain names and take whatever other action is necessary to prevent them from being: a) transferred to any third party other than to the U.S. government or the National Center on Missing and Exploited Children (NCMEC), b) registered in the future; or c) able to re-direct to another domain name or website.

Please be aware that in one of the lawsuits concerning pornhub.com, the credit card company, Visa, was named as a defendant. In response to Visa's motion to dismiss, in July 2022, the federal district court judge issued an opinion denying Visa's motion. You should be cognizant of the following passage of the Judge's opinion:

*MindGeek [the owner/operator of pornhub.com] is being sued for knowingly monetizing child porn. Visa's act of continuing to recognize MindGeek as a merchant is directly linked to MindGeek's criminal act, as Visa's act served to keep open the means through which MindGeek completed its criminal act knowing that that criminal act was being committed.*⁴

We are writing to ensure that Verisign is aware that MindGeek and pornhub.com are alleged to have monetized child sexual abuse material in violation of the law. Unless Verisign immediately suspends the domain name pornhub.com (and any mirror or re-direct domain names of the website on the .com TLD), Verisign may also be maintaining the means by which MindGeek completes criminal acts. The same applies to xvideos.com and its .com domain name(s).

As has been widely reported, including in an investigative series in the *New York Times*,⁵ the sexual abuse of children to create CSAM, conveyed and distributed over the internet, is a criminal matter that has grown exponentially in recent years. Given that Verisign is the registry for a majority of the domain names for websites operating around the world (across both generic and country-code TLDs), Verisign is uniquely positioned to help combat the horrific increases in the online distribution of CSAM. While Verisign's trusted notifier program with the Internet Watch Foundation (IWF) may well serve as a positive step forward, much more needs to be done. We were disappointed to read in IWF's own 2020 Annual Report that **the .com and .net TLDs that Verisign administers contained 82% of the CSAM identified by the IWF: 59% on .com and 23% on .net.**⁶

NCOSE and its allies have communicated with Verisign before, including via the attached letter dated April 7, 2020, to Verisign's General Counsel, Thomas Indelicarto, seeking to better

⁴ <https://pershingsquarefoundation.org/wp-content/uploads/2022/07/031138281455.pdf>

⁵ Michael H. Keller and Gabriel J.X. Dance, "The Internet is Overrun with Images of Child Sexual Abuse, What Went Wrong?" *The New York Times*, September 29, 2019 (and three following, related articles), <https://www.nytimes.com/interactive/2019/09/28/us/child-sex-abuse.html>.

⁶ Internet Watch Foundation, 2020 Annual Report, <https://annualreport2020.iwf.org.uk/trends/international/domain>.

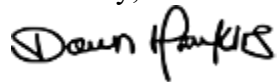
understand how Verisign implements its policies regarding CSAM and human trafficking. NCOSE reiterated these requests subsequent letters in February and March 2021 (also attached).

We repeat our request that Verisign, at the registry level, suspend/cancel the domain names pornhub.com and xvideos.com and that Verisign lock these domain names and take whatever other action is necessary to prevent them from being: a) transferred to any third party other than to the U.S. government or the National Center on Missing and Exploited Children (NCMEC); b) registered in the future; or c) able to re-direct to another domain name or website.

Failing to take action now that you are aware of the mass distribution of CSAM and other criminal content on these websites, could mean you are facilitating and benefitting from sex trafficking in violation of 18 U.S.C. §§1591 and 1595.

We look forward to your soonest response.

Sincerely,

A handwritten signature in black ink that reads "Dawn Hawkins". The signature is written in a cursive, slightly slanted style.

Dawn Hawkins, CEO
National Center on Sexual Exploitation

Attached:

Child Protection Group Response Letter to Verisign 4-7-20
2021DDL_NotificationLetter_Verisign_Final_02.18.21
Verisign_Daily Caller Article Response _03.18.21