

# United States Senate

WASHINGTON, DC 20510

February 7, 2025

## VIA ELECTRONIC TRANSMISSION

Mr. Mike Zaneis  
President & Chief Executive Officer  
Trustworthy Accountability Group  
888 17th Street NW, Suite 620  
Washington, DC, 20006

Dear Mr. Zaneis,

We write to express profound concern that entities certified by the Trustworthy Accountability Group (TAG) have participated in the delivery of advertising, including by United States government advertisers, on a website that has been known to host child sexual abuse material (CSAM) since at least 2021, according to transparency reports released by the National Center for Missing & Exploited Children (NCMEC).<sup>1</sup> The dissemination of CSAM is a heinous crime that inflicts irreparable harm on its victims.<sup>2</sup> When digital advertisers place content on websites that are known to host such activity, they have in effect created a funding stream that perpetuates criminal operations and irreparable harm to our children. We urge your organization to strengthen and adequately enforce its standards so accredited vendors are no longer allowed to support the funding of CSAM and other illegal websites.

TAG's actions here—or at best, inaction—have raised several concerns. First, advertisers have unwittingly advertised on a website known to host CSAM, despite working with advertising technology vendors accredited by TAG for “brand safety.” TAG’s “Brand Safety Certified” Guidelines identify a “floor” for content that is prohibited from receiving advertising.<sup>3</sup> This “floor” includes “Crime & Harmful Acts to Individuals and Society and Human Right Violations” and “Adult & Explicit Sexual Content.” Nevertheless, reporting indicates that at least nine TAG-certified vendors participated in the placement of advertising on [imgbb.com](https://imgbb.com)—a website that has been known to host CSAM since 2021.<sup>4</sup>

Additionally, TAG has failed to enforce its standards and investigate non-compliance, resulting in the continued funding of CSAM and other criminal activity for years. While this is not the first instance where TAG-certified vendors have reportedly participated in delivery or measurement of advertising on websites engaged in illegal activity, these vendors have remained in good standing.

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<sup>1</sup> *Are Ad Tech Vendors Facilitating or Monitoring Ads on a Website That Hosts Child Sexual Abuse Material?*, ADALYTICS (Jan. 2025), <https://adalytics.io/blog/adtech-vendors-csam>; National Center for Missing & Exploited Children, *2021 Notifications Sent by NCMEC Per Electronic Service Providers (ESP)*, MissingKids.org, <https://www.missingkids.org/cybertiplinedata> (last visited Jan. 16, 2025).

<sup>2</sup> U.S. Dep’t of Justice, *Child Sexual Abuse Material: 2023 Report*, <https://www.justice.gov/d9/2023-06/child-sexual-abuse-material-2.pdf> (last visited Jan. 16, 2025).

<sup>3</sup> Trustworthy Accountability Group, *Brand Safety Certified Guidelines* (July 2024), <https://2848641.fs1.hubspotusercontent-na1.net/hubfs/2848641/BSC%20Guidelines.pdf>.

Further, while TAG publicly states that it has “worked closely”<sup>5</sup> with the United States government on several of its efforts to combat digital threats, TAG-certified companies failed to prevent the government’s own advertising from appearing on a website known to host CSAM.

You have personally referred to TAG as being “like the Good Housekeeping seal of approval for digital advertising.”<sup>6</sup> But, to the contrary, recent witness testimony in the United States District Court for the Eastern District of Virginia identified TAG as “the minimum bar” and points to its “lax standards.”<sup>7</sup> Whether TAG holds itself out as the ceiling or the floor, the failure of TAG-certified entities to prevent advertising from appearing on and funding a website known to host illegal CSAM is unacceptable.

It is imperative that your company take immediate and comprehensive action to address this issue and ensure that you are not funding these heinous crimes against children. To better understand how this occurred and to determine appropriate corrective actions, please answer the following questions **by February 14, 2025**:

1. What is TAG’s plan to review the certification status of vendors that have participated in delivery or measurement of advertising on CSAM-hosting websites?
2. What is TAG’s standard for reviewing or revoking an entity’s certification for “brand safety” where such a company fails to identify or prevent ads from appearing on known CSAM or otherwise unlawful websites? Please outline any immediate corrective actions, including reviews of certified companies and potential revocation of certifications.
3. Have TAG-certified vendors have reported URLs containing CSAM to NCMEC? How many URLs have been reported since 2021?
4. How many vendors’ certification statuses has TAG suspended or revoked for non-compliance with standards? Please outline any such enforcement actions or remediations resulting from TAG’s inquiries or certification standing reviews.
5. Has TAG received complaints related to any of the entities identified as having participated in the delivery or measurement of advertising on imgbb.com since 2021?
6. What specific audits, monitoring, or oversight mechanisms does TAG employ to ensure certified companies comply with these standards?
7. Why does advertising continue to be served on CSAM-hosting and other illicit websites despite the use of TAG-certified vendors?

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<sup>5</sup> Trustworthy Accountability Group, *TAG Becomes First Cybersecurity Information Sharing Organization for Digital Ad Industry*, TAG (May 25, 2017), <https://www.tagtoday.net/pressreleases/tag-becomes-first-cybersecurity-information-sharing-organization-for-digital-ad-industry>.

<sup>6</sup> Thomas Claburn, *TAG, You’re S!t: Internet Advertising Industry Bods Admit Self-Policing Approach Is a Sham\**, THE REGISTER (Sept. 30, 2019), [https://www.theregister.com/2019/09/30/tag\\_ad\\_fraud/](https://www.theregister.com/2019/09/30/tag_ad_fraud/).

<sup>7</sup> Arielle Garcia, *Trial Update, September 24: Google Says It’s the Guardian of the Industry, but DOJ Says “Not So Fast”*, U.S. V. GOOGLE ADS TRIAL TRACKER (Oct. 7, 2024), <https://www.usvgoogleads.com/trial-updates/trial-update-september-24-google-says-its-the-guardian-of-the-industry-but-doj-says-not-so-fast>

8. TAG’s Brand Safety guidelines specifically identify certain “content” that is prohibited from monetization, including illegal pirated content. Yet, the guidelines make no mention of standards relating to the monetization of *websites* engaged in illegal activity, as is the case with *imgbb.com*.
  - a. Please explain TAG’s position as it relates to websites that distribute CSAM or engage in other illegal activity.
  - b. Is TAG’s position that it is acceptable for Brand Safety certified members to participate in the delivery of advertising, and thus advertising revenue, to websites engaged in illegal activity, as long as the advertising does not appear next to “content” that is prohibited?
  - c. Do TAG standards address whether certified vendors are permitted to maintain their revenue share or fees when they measure advertisements served on CSAM or other illegal websites?
9. What additional measures is TAG considering to strengthen its certification and enforcement process and prevent similar failures in the future? Please provide a timeline for implementing such measures.

Your cooperation and transparency are essential to safeguarding the safety of our children. Thank you for your attention to this urgent matter.

Sincerely,



Marsha Blackburn  
United States Senator



Richard Blumenthal  
United States Senator