

United States Senate

WASHINGTON, DC 20510

February 7, 2025

VIA ELECTRONIC TRANSMISSION

Mr. Sundar Pichai
Chief Executive Officer
Google
1600 Amphitheatre Parkway
Mountain View, California 94043

Dear Mr. Pichai,

We write to express our grave concern that Google’s advertising technology has supported the monetization of websites that have been known to host child sexual abuse material (CSAM). Recent research¹ indicates that Google, as recently as March 2024, has facilitated the placement of advertising on imgbb.com, a website that has been known to host CSAM since at least 2021,² according to transparency reports released by the National Center for Missing & Exploited Children (NCMEC).³ Just as concerning are reports that the United States government’s own advertising has appeared on this website.⁴ The dissemination of CSAM is a heinous crime that inflicts irreparable harm on its victims.⁵ Where digital advertiser networks like Google place advertisements 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.

Google’s actions here—or in best case, inaction—are problematic for several reasons. First, the instances of ads being served on a website known to host illegal CSAM via Google’s advertising technologies violates Google’s own policies. As you are aware, the production, distribution, sale, and possession of materials depicting CSAM is violates federal law.⁶ Google’s own publisher policies further prohibit the monetization of content that “is illegal, promotes illegal activity, or infringes on the legal rights of others” and explicitly prohibit “[c]hild sexual abuse and exploitation,” stating that it does not allow content that “[s]exually exploits or abuses children or content that promotes the sexual exploitation or abuse of children...[including] all child sexual abuse materials.”⁷ While Google’s policies state that the company will take “appropriate action,

¹ *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>.

² 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).

³ National Center for Missing & Exploited Children, *2021 Notifications Sent by NCMEC Per Electronic Service Providers (ESP)*, <https://www.missingkids.org/cybertiplinedata> (last visited Jan. 16, 2025).

⁴ *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>.

⁵ 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).

⁶ See 18 U.S.C. § 2251; 18 U.S.C. § 2252; 18 U.S.C. § 2252A.

⁷ See, e.g., *Ad Manager Help: Prohibited Content Policies*, Google, <https://support.google.com/admanager/answer/10502938> (last visited Jan. 16, 2024); *Transparency: Google Ad Manager Product Terms*, Google, https://transparency.google/intl/en_US/our-policies/product-terms/google-ad-manager/ (last visited Jan. 16, 2024).

which may include reporting to the National Center for Missing & Exploited Children and disabling accounts.”⁸ It remains unclear, however, whether Google has ceased its relationship with the website identified in this report,⁹ and it is deeply troubling that the largest advertising technology company continued to monetize the website for at least three years since NCMEC first identified the website as a purveyor of CSAM.

Additionally, Google has failed to perform due diligence in identifying businesses that conduct illegal activity using its products. The website in question does not publicly disclose its ownership. We have seen previous instances where Google’s apparent failure to perform due diligence of the customers monetizing their websites via Google’s advertising products have resulted in advertising revenue inadvertently funding OFAC-sanctioned websites.¹⁰

Further, Google executives recently testified in the United States District Court for the Eastern District of Virginia about the company’s extensive investment in vetting publishers and advertisers who use their products.¹¹ Yet, as Google appears to be funding a website that does not declare its ownership, and has been known to host CSAM, these statements are irreconcilable with the indisputable evidence we have seen.

Just as troubling, reporting also indicates that advertisers—including the federal government—that use Google products cannot comprehensively track what businesses and content their ad dollars fund. Many advertisers reportedly cannot readily access page URL-level reporting that would allow them to identify which pages their ads have appeared on, including if they had appeared on imgbb.com.¹² Imgbb.com is an anonymous photo sharing website that hosts user-

⁸ *Ad Manager Help: Prohibited Content Policies*, Google, <https://support.google.com/admanager/answer/10502938> (last visited Jan. 16, 2024).

⁹ The website in question can be accessed through two domains: imgbb.com and ibb.co.

¹⁰ See, e.g., Kali Hays, *Google Served Ads on Sanctioned Websites, Adalytics Report Says*, BUS. INSIDER (Apr. 6, 2022), <https://www.businessinsider.com/google-served-ads-sanctioned-websites-adalytics-report-russia-2022-4>; Craig Silverman, *Google Ads Funded Disinformation About COVID and Elections*, PROPUBLICA (Sept. 7, 2022), <https://www.propublica.org/article/google-alphabet-ads-fund-disinformation-covid-elections>.

¹¹ See Testimony of Per Bjorke, *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 (Sept. 24, 2023), <https://www.usvgoogleads.com/trial-updates/trial-update-september-24-google-says-its-the-guardian-of-the-industry-but-doj-says-not-so-fast>; Testimony of Alejandro Borgia, *Trial Update: September 25 – Google Calls Four Live Witnesses That Either Have Been Paid or Still Are Paid by Google*, U.S. v. GOOGLE ADS TRIAL TRACKER (Sept. 25, 2023), <https://www.usvgoogleads.com/trial-updates/google-calls-four-live-witnesses-that-either-have-been-paid-or-still-are-paid-by-google>.

¹² See, e.g., *Sweetgreen Admedia: Google Search Advertising*, ADWEEK (Apr. 15, 2024), <https://www.adweek.com/media/sweetgreen-admedia-google-search-advertising/> (“While Google executives have said the product has driven growth, buyers have complained that Performance Max is a black box. Specifically, advertisers say there’s no sufficient controls on where ads go or reporting data on where ads actually ended up”); *Are YouTube Ads COPPA Compliant?*, ADALYTICS, <https://adalytics.io/blog/are-youtube-ads-coppa-compliant> (“...advertisers report they cannot audit this issue because Pmax does not provide them with granular placement reports.”); Department of Justice, *Proposed Remedies for Search Trial: Access to Data Reports*, https://storage.courtlistener.com/recap/gov.uscourts.dcd.223205/gov.uscourts.dcd.223205.1062.1_1.pdf (last visited Jan. 16, 2024) (“Google must not limit the ability of advertisers to export in real time (by downloading through an interface or API access) data or information relating to their entire portfolio of ads or advertising campaigns bid on, placed through, or purchased through Google, including data relating to placement or performance (i.e., conversion data.)”); Lara O’Reilly, *IPG Mediabrands ‘Privacy Alert’ Says Clients Should ‘Consider’ a Pause on Google Ads*

generated content. Without access to the URLs on which their ads appeared, advertisers have no ability to understand whether their ads have appeared on content that violates Google's policies, their own policies, or federal law.

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 steps does Google take to perform due diligence on the entities that monetize their websites or content using Google's advertising technologies?
2. Since becoming aware that advertising was placed via Google's products on a website known to host CSAM, what actions have you taken to address or remedy this issue? Please include details on any refunds to advertisers, account suspensions, or broader policy changes implemented in response, including exact figures of how much you have refunded companies or the United States government for all ads served on imgbb.com and ibb.co and when the refunds were issued.
3. Why are advertisers unable to readily view the exact URLs of the pages where their advertisements appear through each of Google's different advertising technologies? If such capability exists, please include documentation for how advertisers can do this across Google products, including DV360, Google Ads, and Google's Performance Max.
4. How much advertising revenue has been derived by Google annually in relation to advertising served on websites that are identified by NCMEC as having hosted CSAM?
5. How much revenue has Google paid to companies that own or operate sites that host CSAM?
6. How often do you review NCMEC's transparency reports to ensure that you are not monetizing websites that host CSAM?
7. Was Google aware in this particular instance that imgbb.com was hosting CSAM? If so, what processes did Google implement to stop the placements of advertisements on that site?
8. How many websites which are known to host CSAM according to NCMEC is Google currently monetizing? Please include details on the process that Google uses to confirm this figure.
9. What additional steps will your company take to ensure that advertising dollars do not fund illegal content in the future? Please include a specific timeline for implementing these measures.

Product, BUS. INSIDER (Aug. 17, 2023), <https://www.businessinsider.com/ipg-mediabrands-privacy-alert-pause-google-performance-max-ads-2023-8>.

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