

## WASHINGTON, DC 20510

February 7, 2025

## **VIA ELECTRONIC TRANSMISSION**

Mr. Andy Jassy Chief Executive Officer Amazon 440 Terry Ave N Seattle, Washington, 98109

Dear Mr. Jassy,

We write to express our profound concern that Amazon's technology has been used to monetize websites that have been known to host child sexual abuse material (CSAM). Recent research indicates that Amazon has facilitated the placement of advertising on imgbb.com, a website that has been known to host CSAM since at least 2021, according to transparency reports released by the National Center for Missing & Exploited Children (NCMEC). The dissemination of CSAM is a heinous crime that inflicts irreparable harm on its victims. When digital advertising technologies 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.

Amazon's actions here—or in best case, inaction—are problematic for several reasons. First, the instances of advertisements being served on a website known to host illegal CSAM via Amazon's advertising technologies violates Amazon's own policies. As you are aware, the production, distribution, sale, and possession of materials depicting CSAM violates federal law.<sup>5</sup> Amazon's own policies further prohibit ads from appearing on websites that host "illegal content" and "adult and explicit sexual content." It remains unclear, however, whether Amazon has ceased its relationship with the website identified in this report, and it is deeply troubling that you have continued to monetize the website for at least three years since NCMEC first identified the website as a purveyor of CSAM.

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<sup>&</sup>lt;sup>1</sup> National Center for Missing & Exploited Children, 2021 Notifications Sent by NCMEC Per Electronic Service Providers (ESP), MissingKids.org, <a href="https://www.missingkids.org/cybertiplinedata">https://www.missingkids.org/cybertiplinedata</a> (last visited Jan. 16, 2024).

<sup>&</sup>lt;sup>2</sup> Are Ad Tech Vendors Facilitating or Monitoring Ads on a Website That Hosts Child Sexual Abuse Material?, Adalytics (Jan. 2025), <a href="https://adalytics.io/blog/adtech-vendors-csam">https://adalytics.io/blog/adtech-vendors-csam</a>...

<sup>&</sup>lt;sup>3</sup> U.S. Dep't of Justice, *Child Sexual Abuse Material*: 2023 Report, <a href="https://www.justice.gov/d9/2023-06/child-sexual-abuse-material-2.pdf">https://www.justice.gov/d9/2023-06/child-sexual-abuse-material-2.pdf</a> (last visited Jan. 16, 2024).

<sup>&</sup>lt;sup>4</sup> See, e.g., John McCarthy, Government Launches Investigation into Brands Advertising on Child Abuse Sites, THE DRUM (Nov. 6, 2018), <a href="https://www.thedrum.com/news/2018/11/06/government-launches-investigation-brands-advertising-child-abuse-site">https://www.thedrum.com/news/2018/11/06/government-launches-investigation-brands-advertising-child-abuse-site</a>; Sheila Dang, <a href="https://www.reuters.com/technology/exclusive-brands-blast-twitter-ads-next-child-pornography-accounts-2022-09-28/">https://www.reuters.com/technology/exclusive-brands-blast-twitter-ads-next-child-pornography-accounts-2022-09-28/</a>; David Ingram, <a href="https://www.nbcnews.com/tech/tech-news/meta-drew-ire-walmart-match-ads-appearing-explicit-content-new-mexico-rcna133467">https://www.nbcnews.com/tech/tech-news/meta-drew-ire-walmart-match-ads-appearing-explicit-content-new-mexico-rcna133467</a>.

<sup>&</sup>lt;sup>5</sup> See 18 U.S.C. § 2251; 18 U.S.C. § 2252; 18 U.S.C. § 2252A.

<sup>&</sup>lt;sup>6</sup>Amazon Ads Help: Advertising Policies, <a href="https://advertising.amazon.com/help/GPGQYV8AH8Y7CUQD">https://advertising.amazon.com/help/GPGQYV8AH8Y7CUQD</a> (last visited Jan. 16, 2024).

Additionally, Amazon 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. Amazon states on its website that "Amazon applies brand safety measures to help deliver your off-Amazon ads to trustworthy placements next to appropriate and relevant content." Yet Amazon has delivered ads on a website with no publicly disclosed owner that has been known to host CSAM.

Just as troubling, reporting also indicates that advertisers—including government advertisers—that use Amazon products cannot comprehensively track what businesses and content their ad dollars fund. Many advertisers reportedly cannot readily access page URL-level reports that would allow them to identify which pages their ads have appeared on, including if they had appeared on imgbb.com.<sup>8</sup> Imgbb.com is an anonymous photo sharing website that hosts user-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 Amazon'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 Amazon take to perform due diligence on the entities that monetize their websites or content using Amazon's advertising technologies?
- 2. Since becoming aware that advertising was placed via your tools 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 easily view the exact URLs of the pages where their advertisements appear through Amazon's advertising technologies? If this capability exists, please provide documentation for how advertisers can do this.
- 4. How much advertising revenue has been derived by Amazon annually in relation to advertising served on websites that are identified by NCMEC as having hosted CSAM?
- 5. How much revenue has Amazon paid to companies that own or operate sites that host CSAM?

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<sup>&</sup>lt;sup>7</sup> Advertising Policies, Amazon Ads, <a href="https://advertising.amazon.co.uk/help/GFDAZEU76AZZ8K3A">https://advertising.amazon.co.uk/help/GFDAZEU76AZZ8K3A</a> (last visited Jan. 16, 2024).

- 6. How often do you review NCMEC's transparency reports to ensure that you are not monetizing websites that host CSAM?
- 7. How many websites which are known to host CSAM is Amazon currently monetizing? Please include details on the process that Amazon uses to confirm this figure.
- 8. What additional steps will your company take to ensure that advertising dollars do not fund illegal content in the future? Please include 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

Wither Blumen Park