

United States Senate

WASHINGTON, DC 20510

February 7, 2025

VIA ELECTRONIC TRANSMISSION

Mr. Mark Zagorski
28 Crosby St 6th Floor
New York, New York 10013

Dear Mr. Zagorski,

We write to express serious concerns that DoubleVerify’s advertising verification and brand safety products have led advertisers to inadvertently fund websites that are known to host child sexual abuse material (CSAM). Recent research¹ indicates that DoubleVerify has known advertising has appeared on Imgbg.com, a website that has been known to host CSAM since at least 2021.²

The dissemination of CSAM is a heinous crime that inflicts irreparable harm on its victims.³ 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.⁴

We are particularly concerned that advertisers relying on DoubleVerify’s brand safety and verification technologies have had their ads served on a website known to host CSAM. Many advertisers rely on DoubleVerify’s services to place their ads and operate under the assumption that their ads will not appear adjacent to or fund harmful content and illicit websites.

DoubleVerify states that its “Universal Content Intelligence” capabilities “provide a holistic approach to content analysis and evaluation,” asserting that “this sophisticated tool leverages AI and relies on DoubleVerify robust and proprietary content policy to provide advertisers with accurate content evaluation, broad coverage and brand suitability protection at scale.”⁵ Yet, DoubleVerify advertiser customers paying for its sophisticated and “industry-leading” technology

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, 2024).

³ 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, 2024).

⁴ *See, e.g.*, John McCarthy, *Government Launches Investigation into Brands Advertising on Child Abuse Sites*, THE DRUM (Nov. 6, 2018), <https://www.thedrum.com/news/2018/11/06/government-launches-investigation-brands-advertising-child-abuse-site>; Sheila Dang, *Exclusive: Brands Blast Twitter for Ads Next to Child Pornography Accounts*, REUTERS (Sept. 28, 2022), <https://www.reuters.com/technology/exclusive-brands-blast-twitter-ads-next-child-pornography-accounts-2022-09-28/>; David Ingram, *Meta Drew Ire from Walmart, Match for Ads Appearing Next to Explicit Content in New Mexico*, NBC NEWS (Jan. 16, 2024), <https://www.nbcnews.com/tech/news/meta-drew-ire-walmart-match-ads-appearing-explicit-content-new-mexico-rcna133467>.

⁵ *Navigating the Evolving Digital Media Landscape with DV Universal Content Intelligence*, DOUBLEVERIFY (June 6, 2024), <https://doubleverify.com/navigating-the-evolving-digital-media-landscape-with-dv-universal-content-intelligence/>.

have had their ads served on a website that hosts content involving heinous crimes against children.⁶

Advertisers who use DoubleVerify's brand safety and verification products are still unable to verify where their advertising appears and what their dollars are funding. As a vendor whose code appears directly in ads that serve on a given page, DoubleVerify should have visibility into the full-page URL where an ad is rendered. However, we understand that DoubleVerify generally withholds long-term, granular page-level data from its clients.⁷

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. How did advertisements monitored and "verified" by your platform appear on websites hosting CSAM? Please provide a thorough explanation of the mechanisms in place for identifying and blocking unlawful content and why they did not work in this instance.
2. Since becoming aware that advertising measured by your Company appeared on a website known to host CSAM, what specific actions has your company taken to remedy this issue? Include details on updates to your verification processes, blocking of offending sites, and outreach to impacted advertisers.
3. Do you annually review the National Center for Missing & Exploited Children's (NCMEC) transparency reports to ensure that you are appropriately classifying or blocking websites that host CSAM?
 - a. If so, why did you continue to allow client ads to serve on imgbb.com?
 - b. If not, why not?
4. How many URLs or pages has DoubleVerify reported to NCMEC since 2021?


⁶ *Are Google's ad exchange & Fortune 500 advertisers working with Treasury sanctioned websites in Russia, Iran, & Syria?*, ADALYTICS (Apr. 13, 2022), <https://adalytics.io/blog/adtech-sanctions>; *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>; Ryan Barwick, DOJ, NCIS, Brand Safety, Google, Integral Ad Science, DoubleVerify, MARKETING BREW (Oct. 11, 2024), <https://www.marketingbrew.com/stories/2024/10/11/doj-ncis-brand-safety-google-integral-ad-science-doubleverify>.


⁷ Reem Makari, *DoubleVerify and IAS Accused of Running Fortune 500 Ads on Websites with Offensive Content*, CAMPAIGN US (Aug. 12, 2024), <https://www.campaignlive.com/article/doubleverify-ias-accused-running-fortune-500-ads-websites-offensive-content/1884708>; Jack Neff, *Brand Safety Controls Questioned by Adalytics in Report About Fandom*, AD AGE (Aug. 7, 2024), <https://adage.com/article/digital-marketing-ad-tech-news/brand-safety-controls-questioned-adalytics-report-about-fandom/2574066>.

- a. Did DoubleVerify report the website in question?
 - b. If so, on what date(s) and to which authorities?
5. How much revenue has DoubleVerify derived from measuring, monitoring, or otherwise deploying your technologies on advertising served on websites known by NCMEC to host CSAM?
- a. What is your policy on revenue derived from monitoring advertising on illicit websites?

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