Tennessee v. Meta
Case No. 23-1364-IV
PX-10049

PHOENIX AZ 852
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Mark Zuckerberg
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March 7, 2022

Mark Zuckerberg
CEO
Meta Platforms, Inc.
One Hacker Way
Menlo Park, CA 94025

RE: Meta Platforms, Inc. on the 2022 Dirty Dozen List

Dear Mr. Zuckerberg,

We write to inform you that Meta Platforms, Inc. is being named to the 2022 Dirty Dozen List, which identifies 12 leading mainstream contributors to sexual exploitation and abuse. The National Center on Sexual Exploitation—a non-partisan nonprofit in Washington, DC dedicated to addressing the full spectrum of sexual exploitation—calls on Meta to improve key policies and practices to prevent and disrupt the sexual abuses rampant on its many platforms.

Given its prominence and resources, Meta has the potential to lead the tech industry in creating and implementing online safety standards. Instead, Meta is prioritizing new projects and products, all while pursuing increased, sweeping encryption without sufficient provisions for child online safety which will aid predators in escaping detection and accountability. And without a commitment to put safety before profit across all its platforms, the so-called "metaverse"—where social media and virtual reality meet—will likely unleash new manifestations of sexual abuse and exploitation.

Concerns Regarding Meta's Prioritization of Safety in the Metaverse and Related Products

The technological trend towards augmented, virtual reality, and more, is like all tools: neutral in nature. However, many unique dangers already exist in these spaces that will likely expand as the technology becomes more popular and easily accessible.

In fact, instances of sexual abuse and harassment through Meta's virtual reality have already made headlines when a psychotherapist who researches the metaverse was gang raped within a minute of stepping into Horizon Worlds.[1] So many people were being groped

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online that as a result, Facebook belatedly added a Personal Boundary feature for avatars that will be on by default.[2]

And while Facebook's portal into its concept that is closest to Meta's vision of the metaverse, Horizon Worlds, is supposedly for those 18 years old and older, there is growing evidence that many children are "playing" in an adult space with no protections for minors.[3]

Meta is on the Dirty Dozen List as it has a track record of failing to prioritize the online safety and well-being of its users and has not made significant enough improvements given the gravity and extent of the harms on its platforms. In the later part of 2021, whistleblower revelations and US Senate Congressional hearings with Facebook and Instagram executives unveiled that despite knowing the significant harms its products cause – especially to young girls – the company consistently chooses profits over people. As noted above, sufficient evidence already exists that this negligent track record is set to continue as the company rushes to build new "metaverse" products without comprehensive safety measures in mind.

In fact, a Meta spokesperson speaking with the Washington Post "emphasized that social VR is an emerging and rapidly evolving medium and that the company is figuring things out as it goes" and declined to share if any measures were put in place to protect children from threats.[4]

It is socially irresponsible and reckless to apply a "figure it out as it goes" mentality to issues as serious as sexual assault, harassment, online grooming, and more. Products should not be launched unless they are designed with safety in mind, and thoroughly vetted.

Unless Meta truly prioritizes sweeping and significant safety improvements at the pace it develops new profit-producing products and features, the existing harms will continue to metastasize and new manifestations of sexual exploitation and violence will be unleashed.

Concerns Regarding Meta's Management of Existing Platforms

Meta's entities; Facebook, Instagram, and WhatsApp are all consistently noted by researchers, survivors, and law enforcement as primary places for grooming, sextortion, child sexual abuse materials, sex trafficking, and a host of other crimes and ills.

The 2020 Federal Human Trafficking Report cited that in 2020, 59% of online victim recruitment in active sex trafficking cases occurred on Facebook (more than any other platform). In active cases involving children, that percentage rose to 65%. And the top two most frequently cited platforms for recruiting child victims were Facebook and Instagram.

Of 2000 children ages 9 – 17 surveyed about popular platform usage, 1 in 5 (22%) of Instagram users surveyed, reported having had a sexual interaction on the platform (Snapchat had the highest at 26%, while WhatsApp came in at third with 21%).[5]

This data does not even account for the rampant online grooming for child sexual abuse materials, adult image-based sexual abuse, sextortion, and more.

We have found extensive additional proof of such exploitation happening on these platforms, and would welcome a conversation where we can share this information in detail.

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While we acknowledge that Facebook and Instagram have made notable improvements in the past few years to increase safety, the measures are not nearly enough given the gravity of the harms their products perpetuate and the overwhelming evidence that – despite those changes – **Meta platforms continue to be among the most dangerous places for children and vulnerable adults.**

Improvements Required for Meta to Be Removed from the 2022 Dirty Dozen List

We request the following improvements:

1. Proactively engage with survivors of sexual abuse and exploitation and other experts to ensure new features are developed with a priority placed on the safety and well-being of users, including children.
2. Create pin-protected caregiver controls on all platforms and products including on Oculus Quest headsets and Ray-Ban Stories smart glasses, as well as through adult Facebook accounts that would prevent children from accessing apps and experiences built for adults.
3. Create a very simple way for adult users to report minors in Horizon Worlds and notify the adults whose Facebook accounts are being used.
4. Require additional age verification upon download of "metaverse" products.
5. Invest in and expand technology to detect age-lying, as well as moderation (AI and human.)
6. Improve reporting options to be more prominent, with youth-accessible vernacular at the level of content and users.
7. Prevent verbal or written sexual harassment by default in Horizon Worlds and other virtual or augmented reality products.
8. Follow safety-by-design and Age-Appropriate Design Code principles. Even if children are not allowed on the app, they are there and must be kept as safe as possible.
9. Institute substantive changes across all Meta platforms, including:

Facebook recommendations

- Work together with international law enforcement to ensure encryption pursuits do not undermine child protection.
- Improve proactive monitoring and removal of online grooming and posts, direct messages, or accounts functioning as advertisements for commercial sex.

Instagram recommendations

- Prioritize developing and using preventative and protective tools to stem the sexualization of minors and adult-managed minor accounts.
- Remove known prostitution and pornography accounts of both individual users and corporations like Pornhub and OnlyFans.
- Read all of our recommendations for Instagram in the attached document.

WhatsApp recommendations

- Improve and invest in the privacy of child sex abuse victims by better preventing and disrupting the sharing of child sexual abuse materials (CSAM, i.e. child pornography) through messages, including proactive scanning for novel CSAM materials.
- Turn on privacy and safety settings by default for minor users.
- Improve reporting mechanisms to allow easy, specified reporting for child sexual abuse materials, online grooming, inappropriate behavior towards a minor, and other options related to online safety.

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- Work with survivors of sexual exploitation and other subject matter experts to better understand the impact WhatsApp has when it fails to prevent and disrupt sexual crimes.

Unless Meta prioritizes sweeping and significant safety improvements at the same pace it develops new profit-producing products and features, the existing harms will continue to metastasize and new manifestations of sexual exploitation and violence will be unleashed.

We urge Meta to harness its prominence and resources to lead the tech industry in creating and implementing online safety standards and to finally put people before profits.

We welcome a conversation with Meta about these issues. Please contact us at public@ncose.com.

Respectfully,

Patrick Trueman, Esq.
President

Dawn Hawkins
CEO

Cc:
Sheryl Sandberg, Chief Operating Officer, Meta
Vivek Sharma, Vice President, Horizon
Adam Mosseri, Chief Executive Officer, Head of Instagram
Vaishnavi J, Head of Safety and Wellbeing, Instagram
Karina Newton, Head of Public Policy, Instagram
Will Cathcart, Chief Executive Officer, Head of WhatsApp

Attachment: Instagram Memo Outstanding Issues

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