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February 18, 2021

Mr. Jeffrey Bezos
Chairman, President, and CEO
Amazon.com., Inc.
410 Terry Avenue N.
Seattle, WA 98109

RE: Amazon named to the 2021 Dirty Dozen List

Dear Mr. Bezos:

We write to inform you that Amazon will remain on the annual Dirty Dozen List, which names 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—recognizes the cultural influence of Amazon through its myriad of businesses and calls on Amazon to improve key policies and practices.

The National Center on Sexual Exploitation recognizes and thanks Amazon for a number of improvements, especially for 2020 updates to parental controls for Amazon Prime Video and for the recent removal of full-body and childlike sex dolls from your online marketplace.

We remain concerned about a number of other issues, however. As a social media platform, Amazon's Twitch is rife with sexual harassment, predatory grooming, and child sexual abuse. As an online retailer, Amazon is in the business of selling incest-themed and racist-themed pornography, disembodied sex dolls, photography books with eroticized child nudity, pornographic magazines, and more. As a media creator, Amazon Prime Video inserts unnecessary, gratuitous nudity and simulated sex scenes into many of its original programming, while providing faulty parental controls. Amazon S3 and Amazon Web Services are also host to thousands of hardcore violent pornography and prostitution websites.

Regarding the incest-themed and racist-themed pornography that frequently inundates your marketplace and Kindle offerings even with innocent search terms: NCOSE researchers reviewed all of the "100 top paid" titles in the 18 sub-categories of "erotica" for Kindle and found that between 20-35% of the

top paid titles were blatantly incest-themed.

Incest is a prevalent form of sexual abuse, with conservative estimates showing 34% of child sexual abusers are family members.ⁱ The real-life trauma that these books eroticize is not a trifling matter: it leaves physical and mental scars that go on to cause pain to millions of Americans, and likely to many Amazon employees. When these themes are normalized and eroticized it not only increases victim-blaming by reducing empathy for real-life victims, but it can also encourage and escalate abuse.

We have written to you in previous years outlining in great detail most of these concerns. If you would like to see copies of those letters for reference, please visit

EndSexualExploitation.org/Amazon/#downloads.

While most of those concerns previously communicated with you remain, we have included detailed concerns about your gaming platform, Twitch, in this letter. Following those concerns, we include a summary of improvements we urge you to make on a number of your platforms.

Outline of Concerns Regarding Twitch

Despite Twitch's [strict policies on paper](#)ⁱⁱ prohibiting nudity, exploitation, and other sexual content, as well as other harmful behavior such as harassment or violence, Twitch has a serious problem with moderating and enforcing those policies in practice for the millions of viewers and streamers on their platform. And those users tend to be young—[in 2019, 41% of all Twitch users](#)ⁱⁱⁱ were between the ages of 16-24 years old.

Sexual Grooming and Child Safety on Twitch

Like any other social media platform, Twitch requires users to be at least 13 years old before they sign up. However, the only age verification Twitch asks for during the account creation process is a birthday, an easily-bypassed age gate. In July 2020, a perfunctory [investigation of Twitch revealed a number of children demonstrably under the minimum legal age](#)^{iv}, including a girl who admitted on camera she that was only 11 years old. When reported to Twitch, only a handful of accounts were removed. The article points out the real issue is not the young age of users, but the way adult predators use and abuse platforms like Twitch to have unmitigated access to vulnerable children:

“The dozens of active accounts WIRED discovered on Twitch sometimes contain harrowing conversations between apparent children and strangers. In some instances, the strangers “dare” young streamers for their entertainment, including asking young girls to flip their hair or kiss their friend on camera. Other times, strangers ask for young streamers' contact information on other apps such as Facebook-owned Instagram or Snapchat. (Twitch also has an integrated private chat feature.) They also pretend to donate money, making a chat message appear like a verified donation, or post inappropriate ASCII art in chat. The streamers themselves are by and large unsupervised.”

Despite the meteoric rise in users and the popularity of Twitch with the young demographic, Twitch has yet to develop a set of lockable parental controls for minor accounts, leaving many parents frustrated and children unprotected. The current privacy and safety features are bare minimum at worst and confusing at best. Moderation is too often left to the streamers themselves to report bad actors and suspicious behavior. And [when accounts do violate policies](#)^v, such as when one popular streamer accidentally featured child nudity, Twitch can choose to reinstate revenue-making users, choosing profits over policies.

Clearly Twitch can be counted among the technological advances propelling predators' easy access to minors. This fact is greatly concerning as sexual harassment and assault continues to become more rampant in society. Even more disconcerting is the potential role Twitch is playing in the facilitation of child abuse and exploitation.

Sexual Harassment on Twitch

As gaming continues to gain popularity and wield influence over mainstream culture, it is imperative that Twitch and Amazon become industry leaders in how the community handles and treats sexual harassment and assault. Twitch, as one of the online hubs for gaming, represents much of this culture and community on their platform.

An [estimated 65% of Twitch users are male](#)^{vi}, yet women are an ever growing demographic in the gaming world and therefore on Twitch. Some of the [most popular Twitch streamers](#)^{vii} are women with millions of followers. **Why then, are women still being harassed and even assaulted through Twitch on an almost daily basis?**

This problem is not new to Twitch, which has been noted as a haven for sexual harassment and female-targeted hate for years. In June 2020, [dozens of women on Twitch came forward with stories of harassment and assault](#)^{viii} by many streamers and members of the Twitch community. Even after women shared harrowing accounts, many accused accounts remained live on Twitch. [A collection of the accusations lists over 400 users](#)^{ix} as complicit in harassment, abuse, and even rape.

“The men accused of harassment and misconduct range from streamers with thousands of followers to those with hundreds of thousands of followers or more. Some of the stories involve incidents that happened on Twitch, such as men who were allegedly streaming while messaging underage fans for sexual photos. Others didn't happen on Twitch directly but involve people in its community. Several people said they met an abuser through Twitch or that misconduct occurred at a Twitch event or an afterparty at a Twitch convention.”^x

[The Twitch CEO said this](#)^{xi} of the accusations: “The status quo needs to change. This reckoning and industry-wide actions are overdue, and this is another issue that we, and the industry, need to address to create lasting and positive change.”

We agree the status quo needs to change. So what is Amazon doing to change it?

Twitch has the capability to develop and implement strong, industry-leading policies and practices that will protect its users from exploitation, abuse, and harassment. It's not just a matter of capability, but rather responsibility on Twitch and Amazon's part to do everything in their power to create a safe, respectful, and exploitation-free culture—on both the Twitch platform and in the gaming community as a whole.

Ultimately, Twitch is responsible for setting the tone of its online environment, for regulating that environment, and for ensuring Twitch does not increasingly become a hunting ground for predators and abusers. In this regard, we strongly believe Twitch is falling short of doing all that could be done to mitigate against the use of its platform in ways that foster and perpetuate sexual harms.

Summary of Improvements Requested of Amazon:

Again, while we applaud Amazon for 2020 improvements of removing full-body and childlike sex dolls and for finally rolling out parental controls on Prime Video, it continues to be an online marketplace rife with sexual exploitation. We request the following improvements:

Prime Video Parental Controls

Shortcomings of the current parental controls offering:

- These features do not work if you are accessing Prime Video from Xbox.
- Kids can just move from profile to profile without a pin. (This was the same problem Netflix had and fixed thanks to NCOSE's advocacy in 2020.) The only way around this is to have the strictest age restrictions on all profiles until Amazon fixes this.
- If you have downloaded mature rated content on any of your devices to watch when you're not connected, it will be available to all profiles (read: to kids) no matter your settings.
- Ironically, none of these features when set at the account owner level will work on Amazon's own Fire TV, Fire Tablet, or Fire phone. Users will have to manually set parental controls for each of these systems separately, which is just redundant and complicated for already overburdened caregivers (Here's how for Fire Tablet, for Fire TV, for Fire Phone).

Amazon Studios & Prime Video

- Stop making films with gratuitous amounts of nudity and sexual violence. Unfortunately, a sample survey of third-party reviews of Amazon Prime original content shows that 66% of it contains nudity (82% of which is female) and 36% of the surveyed Amazon Prime original shows contain simulated sex.

Amazon's Twitch

- Develop and implement lockable controls, so parents can monitor and streamline their child's experience on Twitch and ensure basic safety is being met
- Develop more robust age-gating features to protect children on Twitch, including filtering and blocking streams with mature game ratings and/or themes
- Ban minor-aged accounts from sending or receiving money through Twitch's donation and bits feature
- Disable the Whisper feature on minor-aged accounts
- Automatically default minor-aged accounts to the highest level of safety and privacy available on the Twitch platform
- Require, not suggest, that streamers provide mature content warnings on their channel if they broadcast content intended for adults
- Provide education to all users and parents on the potential harms and risks associated with exploitation and abuse on Twitch, and feature prominent reporting processes on all forms of Twitch's interface
- Create and feature PSAs about safety on the Twitch platform

Prime (Online Retailer)

- Stop selling sexual exploitation and abuse. It is unacceptable that you are selling sex trafficking how-to books, disembodied sex dolls, photography books with "eroticized" child nudity, incest-themed and racist-themed written pornography, pornographic magazines and DVDs, and misogynistic clothing items, and more^{xii}
- Better ensure that items are categorized correctly so that sexually explicit content is not showing up in general, innocent searches

Kindle & Publisher

- Reject books with themes sexualizing and normalizing incest, racism, sex with children and teens, and extreme sexual violence

- Ensure “adult” books are actually tagged as “adult” and prohibited from surfacing in general search results as your policy seems to indicate should be happening

Amazon Web Services

- Refuse to host websites that facilitate the purchase of human beings for sex and abuse

In today’s culture, where sexual harassment and assault are rampant, corporations such as Amazon have a renewed corporate responsibility to refrain from normalizing or promoting material that promotes sexual exploitation. Thus far, Amazon has more work to do in order to adequately live up to that vital responsibility.

We invite you to reform these policies and to become a leader against sexual exploitation, by addressing these aforementioned issues.

While the National Center on Sexual Exploitation is placing Amazon on the 2021 Dirty Dozen List, we hope to engage in a future dialogue around these concerns with your executive team, so that Amazon can become a corporate leader against sexual exploitation. Please feel free to reach out to us at 202-393-7245 to set up a meeting or conference call on these concerns.

Respectfully,



Patrick Trueman, Esq.
President & CEO



Dawn Hawkins
Vice President & Executive Director

CC:

Dave Clark, CEO Worldwide Consumer

Andrew R. Jassy, CEO, Amazon Web Services

Ryan Lefton, Principal Business Development Manager, Education

Brian Olsavsky, Senior Vice President & CFO

Mike Roth, Vice President, North America Operations

Dan Scharf, Global Head of Business Affairs, Amazon Studios

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- ⁱ Department of Justice, Office of Justice Programs, Bureau of Justice Statistics, Sexual Assault of Young Children as Reported to Law Enforcement (2000).
- ⁱⁱ *Community Guidelines: Sexual Content*. (2021, Jan 22). Twitch.tv. <https://www.twitch.tv/p/en/legal/community-guidelines/sexualcontent/>.
- ⁱⁱⁱ Mansoor, I. *Twitch Revenue and Usage Statistics (2020)*. (2020, Oct 30). Business of Apps. <https://www.businessofapps.com/data/twitch-statistics/#:~:text=generated%20through%20advertising,Twitch%20User%20Statistics,monthly%20users%20at%20140%20million.>
- ^{iv} D'Anastasio, C. (2020, Jul 31). *Children Stream on Twitch-Where Potential Predators Find Them*. Wired. <https://www.wired.com/story/children-stream-twitch-potential-predators-exploitation/>.
- ^v Patterson, C. (2020, Sep 26). *Twitch reverses Auronplay ban after suspension for bizarre reason*. Dexerto. <https://www.dexerto.com/entertainment/twitch-reverses-auronplay-ban-after-suspension-for-bizarre-reason-1424419/>.
- ^{vi} Monsoor, I. *Twitch Revenue and Usage Statistics*
- ^{vii} Bellanger, C. (2021, Jan 6). *15 Twitch Gaming Streamers Worth Watching*. Upfluence. <https://www.upfluence.com/influencer-marketing/15-twitch-gaming-streamers-worth-watching>.
- ^{viii} Kastrenakes, J. (2020, Jun 25). *Twitch reckons with sexual assault as it begins permanently suspending streamers*. The Verge. <https://www.theverge.com/2020/6/25/21303185/twitch-sexual-harassment-assault-permanent-bans-streamers>.
- ^{ix} Industry, S. S. (2020, Jun 24). *Survivor Stories of Harassment Assault with the gaming and live-streaming industry*. Medium. https://medium.com/@survivors_streaming_industry/survivor-stories-of-harassment-assault-with-the-gaming-and-live-streaming-industry-11cb2fab96f0.
- ^x Kastrenakes, J. *Twitch reckons with sexual assault as it begins permanently suspending streamers*.
- ^{xi} Shear, E. [@eshear]. There's been a lot of important conversation happening over the previous couple days, and I've heard your voices. I'd like to share the email I just sent internally to the company on the topic. [Tweet]. Twitter. <https://twitter.com/eshear/status/1275234049070526464>
- ^{xii} Visit www.endsexualexploitation.org/amazon for screenshots and examples