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**VIA FIRST CLASS MAIL, EMAIL, AND
PERSONAL SERVICE ON REGISTERED AGENT**

C.J. Mahoney
Chief Legal Officer
Meta Platforms, Inc.
1 Meta Way
Menlo Park, CA 94025
cjmahoney@meta.com

Re: Advertisements Containing AI-Generated Child Sexual Abuse Material

Dear Mr. Mahoney:

I write regarding deeply troubling evidence that Meta Platforms, Inc. (“Meta”) has repeatedly approved and distributed paid advertisements containing apparent child sexual abuse material (“CSAM”), including AI-generated and digitally manipulated images and videos depicting children engaged in sexual acts. These advertisements have appeared on its Facebook and Instagram platforms, among other Meta services. No company—particularly one that claims all advertisements are reviewed and approved prior to distribution and then accepts payment for that distribution—should permit its advertising systems to be used in this manner.

An August 5, 2026 investigation by WIRED, based on research by the Tech Transparency Project (“TTP”), initially identified 53 advertisements containing AI-generated CSAM or sexualized depictions of children on Meta’s platforms.¹ TTP has now substantially expanded those findings. In a report published yesterday, TTP identified 332 advertisements containing apparent AI-generated CSAM that ran on Facebook and Instagram. TTP identified multiple advertisements that used photographs of real children that were digitally manipulated to depict them in sexual situations. It further found that 298 of the advertisements directed users to AI image- or video-generation applications and that 182 pointed to apps TTP independently verified could “nudify” people or put them into sex videos.²

My Office has taken a leading role in combating sales of deepfake nonconsensual intimate images, having brought the country’s first civil law enforcement suit against sixteen of the most-visited websites that sell such images.³ Building on that experience, my Office has

¹ See Matt Burgess, *Meta Ran Ads That Contained AI-Generated Child Sexual Abuse Imagery*, WIRED, <https://www.wired.com/story/meta-ran-ads-that-contained-ai-generated-child-sexual-abuse-imagery/> (Aug. 5, 2026).

² See Tech Transparency Project, *Meta Ran Hundreds of Paid Ads with Child Sexual Abuse Imagery*, <https://www.techtransparencyproject.org/articles/meta-ran-hundreds-of-paid-ads-with-child-sexual-abuse-imagery> (Sept. 8, 2026).

³ See Heather Knight, *San Francisco Moves to Lead Fight against Deepfake Nudes*, N.Y. Times, <https://www.nytimes.com/2024/08/15/us/deepfake-pornography-lawsuit-san-francisco.html> (Aug. 15, 2024).

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independently reviewed many of the advertisements identified by TTP. We are particularly concerned that many such advertisements promote services capable of creating intimate deepfakes—including services like those that have been the subject of our Office’s more recent investigations concerning “nudify” apps⁴—and continue to appear despite repeated public reporting and notice to Meta.

These findings are especially troubling because they do not appear to reflect an isolated failure that Meta corrected when first alerted to the problem. After WIRED brought the initial advertisements to Meta’s attention, Meta stated that many of the advertisements containing CSAM predated new AI technology that Meta had recently launched to better detect and block violative advertisements at upload. Yet TTP has now identified hundreds of additional CSAM advertisements that ran after that initial reporting, many verified by my Office’s independent review.

The new report also raises serious questions about Meta’s existing safeguards. Meta represents that it reviews advertisements for compliance with its own advertising standards prohibiting content that sexually exploits or endangers children. Yet TTP found 332 apparent CSAM advertisements that made it through Meta’s advertising-review process. TTP further reports that it specifically brought 129 active CSAM advertisements to Meta’s attention, and yet Meta took at least a week to review those reports, while some advertisements continued accumulating hundreds of additional views in the meantime. And for 73 of the advertisements, Meta responded that they did not violate its advertising standards at all.

Worse, TTP’s documentation suggests broader systemic problems. Meta has publicly described technology designed to detect identical and nearly identical images and videos. Yet TTP found instances in which Meta removed one CSAM advertisement while concluding that an identical advertisement did not violate its advertising standards. TTP also reports that several advertisements were placed through Meta’s own authorized advertising reseller partners in China, raising questions about how Meta applies its enforcement systems to repeat offenders and advertising partners.

These circumstances also raise significant legal questions.

Federal law imposes an independent obligation on online service providers to report certain apparent child sexual exploitation to the National Center for Missing & Exploited Children (“NCMEC”). NCMEC operates the CyberTipline, a centralized national reporting system through which suspected online child sexual exploitation is reported for review and potential referral to law-enforcement agencies. Under 18 U.S.C. § 2258A, once a covered provider like Meta obtains actual knowledge of facts or circumstances indicating an apparent violation of federal child-exploitation offenses, the provider must submit a report to NCMEC as soon as reasonably possible.

⁴ See Matt Burgess, *San Francisco Demands Apple and Google Delete AI ‘Nudify’ Apps From App Stores*, WIRED, <https://www.wired.com/story/san-francisco-demands-apple-and-google-delete-ai-nudify-apps-from-app-stores/> (July 17, 2026).

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TTP states that it reported the advertisements it identified to NCMEC. But TTP's reports do not answer whether Meta itself complied with any independent reporting obligations triggered by Meta's own knowledge of these advertisements—including knowledge acquired through Meta's pre-publication ad review, automated detection systems, user reports, prior enforcement against identical material, or subsequent investigation. Failure to comply with independent statutory obligations such as section 2258A may also implicate California's Unfair Competition Law, Business and Professions Code section 17200 *et seq.* My Office is concerned about whether Meta's reporting and compliance systems are adequately designed to ensure that apparent CSAM is correctly identified, escalated, and reported as soon as Meta becomes aware.

The apparent gap between Meta's stated policies and these results raises additional concerns. Meta has publicly described a "zero tolerance" approach to child exploitation, and it represents that every advertisement is reviewed for compliance with policies prohibiting child sexual exploitation. Yet as noted by TTP's findings—confirmed by my Office's own independent review—hundreds of advertisements containing apparent CSAM passed through those systems. In particular, TTP found 113 CSAM advertisements Meta labeled under adult-oriented policies or generic policy violations without any reference to children. Meta corrected those notices to reflect violations of its child-exploitation policy only after TTP flagged the discrepancies, which raises questions about the reliability of Meta's safeguards for identifying and addressing apparent CSAM.

Meta has publicly stated that it has committed substantial resources to combating child sexual exploitation, as well as addressing some of the advertisements identified by TTP. However, the scale, persistence, and nature of the problems documented here suggest that Meta's isolated takedown efforts are woefully inadequate.

We therefore ask Meta to immediately cease and desist from allowing paid advertisements containing CSAM. We also ask Meta to provide a response explaining how these advertisements were able to pass through its review and enforcement systems; how Meta ensures that apparent CSAM advertisements are appropriately identified, escalated, and reported to NCMEC as required by law; how it addresses repeat offenders, related accounts, and advertising partners associated with such material; and what changes it has made or will make to prevent similar failures in the future. To that end, we would welcome prompt discussions with appropriate representatives from Meta's legal, child-safety, and advertising-compliance teams.

At a minimum, any proposed solutions should: (1) include meaningful measures to improve detection of apparent CSAM before paid advertisements run; (2) ensure rapid and reliable escalation and NCMEC reporting once Meta obtains the requisite knowledge; (3) prevent known offending material and repeat bad actors from reappearing via different advertisements or accounts; (4) provide meaningful mechanisms for reporting apparent CSAM anywhere on Meta's services, including in its ad library; and (5) periodically evaluate whether these systems are actually working, and report publicly on these evaluations.

My Office's objective is not simply to identify past failures but to ensure that Meta puts systems in place that prevent children from being sexually exploited through advertisements

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Meta is paid to distribute, and that Meta reliably satisfies the legal obligations that arise when it becomes aware of apparent child sexual exploitation. This is a serious problem that victimizes real children and contributes to a broader online ecosystem of deepfake sexual exploitation that disproportionately harms women and girls. The burden cannot principally fall on outside researchers, law enforcement, or victims to police advertisements containing apparent CSAM.

Please provide an initial written response within twenty-eight (28) days of this letter and identify appropriate representatives with whom our Office can meet to discuss these issues. If Meta is unwilling to provide sufficient information or meaningful assurances that these problems will be corrected, my Office reserves all rights to pursue further investigation and appropriate legal remedies.

Should you have any questions, please contact my colleague David Louk at 415-505-0844 or david.louk@sfcityatty.org. I appreciate your prompt attention to this matter.

Very truly yours,



DAVID CHIU
City Attorney