United States Senate

WASHINGTON, DC 20510

November 18, 2026

Mark Zuckerberg
Chairman and Chief Executive Officer
Meta Platforms, Inc.
1 Meta Way
Menlo Park, CA 94025

Dear Mr. Zuckerberg:

We write regarding Meta's continued role in advertising apps marketed and distributed for the purpose of generating nonconsensual intimate imagery of women and children. Despite Meta's stated prohibition on these ads, independent investigations have documented extensive ad campaigns on Facebook and Instagram directing customers to apps capable of digitally undressing people in photographs or placing their likeness into sexually explicit content without their consent. These findings raise serious questions regarding Meta's enforcement of its own policies and the effectiveness of the safeguards that would prevent it from profiting off this abuse.

The consequences of these failures are not hypothetical. A 2024 survey by the Center for Democracy & Technology found that 15% of U.S. public high school students knew of AI-generated nonconsensual intimate imagery (NCII) depicting someone at their school. A separate 2025 Thorn survey found that 6% of young people reported having been targeted by AI-generated NCII. Internationally, in February 2026, UNICEF reported that at least 1.2 million children in 11 countries disclosed being victims of nonconsensual nudification in the past year. Outside of schools, NCII is frequently weaponized against female journalists, human rights defenders, politicians, and other prominent women – not simply to humiliate them, but to discredit, intimidate, and silence their work and advocacy. Research by the American Sunlight Project revealed that one in six female Members of Congress were targeted by sexually explicit deepfakes and a 2025 New America investigation documented 100 cases involving public officials across 14 countries, 97 of them involving women. A 2026 UNESCO and UN Women report also found that 45% of surveyed women journalists had self-censored in response to online violence, underscoring the broader threat of image-based sexual abuse to women's free expression rights.

Meta has long been aware that advertisers use its platforms to promote purpose-built NCII applications. In June 2025, Meta acknowledged that advertisers promoting nudify apps were evading detection through seemingly innocuous ad copy, replacement domains, and networks of related accounts. Meta announced new detection measures, enforcement against coordinated advertising networks, and legal action against the operator of CrushAI. Meta has also stated that it has begun sharing URLs associated with nudify applications and websites through the Tech Coalition's Lantern information-sharing network.

Nevertheless, Meta continues to profit from ads for nonconsensual nudify apps that victimize women and girls worldwide. In September 2026, the Tech Transparency Project (TTP) identified 332 paid advertisements on Facebook and Instagram containing apparent child sexual abuse material, including AI-generated sexualized depictions involving real children. According to TTP, 298 of those ads directed users to AI image- and video-generation applications available through Apple's App Store or Google Play.

More troubling still, nonconsensual nudification developers appear to be using Meta's platforms to evade app-store review. In November 2026, AI Forensics documented a network of 444 connected applications associated with more than 84,000 matching advertisements on Meta's platforms since January 1, 2026. Researchers found that some applications concealed sexual deepfake functionality when accessed directly but revealed it to users arriving through Facebook or Instagram advertisements. Referral information and remotely hosted content appeared to determine which features the applications displayed. These findings suggest that Meta's advertising systems were not merely promoting prohibited services, but were being used to direct users to nudification functionality that developers had concealed from Apple and Google's reviewers.

In accompanying reporting, WIRED documented apparent links between the network and Hong Kong-registered KeLing Technology Limited. Meta told WIRED that it had banned KeLing from advertising in 2025, but that the company had continued attempting to advertise through other means. After WIRED shared more than 400 associated domains, Meta reported enforcement against 11,600 advertising accounts, more than 4,700 business pages, 5,200 users, and 15,000 pages linked to the domains, and said it had blocked 209 applications from advertising. Meta told WIRED that it identified more than 3,000 advertisements linked to the domains, most of which it had already removed. But AI Forensics associated more than 84,000 advertisements with the network. These disclosures raise questions about how a network apparently linked to an advertiser Meta had already banned continued operating for most of a year, and why Meta's own accounting captured only a fraction of the advertising researchers identified.

The findings also raise questions about whether Meta has effectively used the information available to it. Through Lantern, Meta has acknowledged sharing information about nudify apps with other companies so they can identify related services and take enforcement action. Yet the network identified by AI Forensics connected Meta advertisements to applications distributed through Apple and Google. It remains unclear when Meta first identified these connections, whether it shared relevant information through Lantern before the investigations became public, or whether its enforcement addressed the underlying network rather than individual advertisements and accounts.

These findings raise questions not only about failures of advertising review, but also about Meta's willingness and ability to identify repeat offenders and disrupt coordinated networks. The TAKE IT DOWN Act, enacted in May 2025, criminalizes certain nonconsensual disclosures of intimate imagery and imposes removal obligations for imagery published on covered platforms. However, its enactment has not resolved the proliferation of advertising for applications

marketed or designed to facilitate this abuse. That gap warrants scrutiny of Meta's enforcement practices and potential gaps in federal law. To help examine those gaps, please respond to the following questions:

- For each year from 2022 through 2026, how many advertisements promoting applications or services intended to facilitate NCII has Meta rejected, removed, or restricted for violating its policies? Please provide annual totals, the applicable policies, and the number of actions initiated proactively rather than in response to external reports.
- How did the advertisements containing apparent child sexual abuse material identified by TTP pass Meta's review systems? How many had Meta previously identified or received reports about, and what actions did Meta take before and after TTP shared its findings?
- How does Meta review advertisements and their destinations to determine whether they promote applications capable of generating nonconsensual nude or sexually explicit imagery? Does Meta examine functionality available after installation, paid features, remotely hosted content, and attempts to conceal the actual purpose of an application?
- When did Meta first become aware that developers were using referrals from Facebook and Instagram advertisements to reveal sexual deepfake functionality concealed from app-store reviewers? What has Meta learned about the referral information and technical mechanisms used to activate these features, and what steps has it taken to prevent advertisers from using its platforms in this way?
- AI Forensics identified more than 84,000 advertisements associated with the network it investigated. How many had Meta identified before the findings became public, and what investigations or enforcement actions resulted? What explains the continued operation of apparently related accounts and domains following Meta's 2025 ban of KeLing Technology Limited?
- What information has Meta shared through Lantern concerning nudify applications, related websites, advertisers, and developer networks since March 2025? Were any applications, domains, or advertisers identified by AI Forensics or WIRED previously flagged through Lantern? If so, when did Meta first identify and share those signals?
- What has Meta learned from its investigations into the individuals, companies, and coordinated networks responsible for advertising applications intended to facilitate NCII, including those identified by AI Forensics and WIRED? Please describe the networks' apparent operators, geographic locations, common technical and financial infrastructure, advertising intermediaries, methods of evading detection and enforcement, and connections to the developers distributing these applications.
- To what extent have these networks continued operating or returned to Meta's platforms following enforcement actions? What obstacles has Meta encountered in identifying the entities ultimately responsible, disrupting their operations, and preventing them from reestablishing advertising accounts?

Meta has repeatedly stated that advertisements promoting nudify applications violate its policies and has promoted its work to combat intimate image abuse. Yet independent researchers continue to document extensive advertising campaigns through which Meta profits from the abuse of women and girls. Meta must explain why its review and enforcement systems have

failed and what concrete measures it will take to more effectively enforce its own policies. We request responses to the above questions by December 9, 2026.

Sincerely,

Ron Wyden
United States Senator

Ben Ray Lujan
United States Senator

Edward J. Markey
United States Senator