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WASHINGTON, D.C. 20580

**Statement of Chairman Andrew N. Ferguson**  
**Joined by Commissioner Melissa Holyoak and Commissioner Mark R. Meador**  
***FTC and Utah Division of Consumer Protection v. Aylo Group Ltd. et al.***  
**Matter Number 2123033**

September 3, 2025

Aylo, better known as MindGeek<sup>1</sup> or by its flagship, Pornhub,<sup>2</sup> is the dominant online pornography platform, hosting an immense amount of content on its free sites (Tube Sites). Before 2020, users were the primary source of content. In this context, a “user” is anyone who wants to upload content to Pornhub or other Tube Sites, distinguished from professional producers, or Content Partners. As alleged in the complaint, Aylo permitted users to upload content to, and download content from, its Tube Sites with virtually no restriction or oversight.

Aylo’s business model was simple: more content, more money. It had two ways of bringing in revenue: advertising and subscriptions. On its Tube Sites, Aylo makes money the same way most free sites make money: advertising. New content on Tube Sites drives traffic, which increases advertising revenue.<sup>3</sup> On its paid-access sites (Pay Sites), Aylo also makes money from users who pay fees to access content.

But Aylo’s policy of allowing users to upload and download content with nearly no oversight came at an unbearable cost. Aylo’s websites and online services allegedly hosted large amounts of child sexual abuse material (CSAM) and non-consensual material (NCM). The most prominent example of the latter is “revenge porn,” in which someone posts pornographic images or videos of a former partner without the former partner’s consent.<sup>4</sup> The creation and distribution of both is prohibited by myriad federal and state civil and criminal laws.<sup>5</sup>

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<sup>1</sup> Aylo operated under the name MindGeek until August 2023. ECF No. 1, Compl. ¶ 47 (Sept. 3, 2025).

<sup>2</sup> Though Pornhub is only one of Aylo’s free pornography websites, the Pornhub brand is well known to and often used as a shorthand by consumers to refer to Aylo and MindGeek.

<sup>3</sup> Compl. ¶ 35 (explaining that Aylo earns ad revenue from both Tube Sites and Pay Sites).

<sup>4</sup> NCM is defined by the order filed today as “[c]ontent in which a person is engaged in Sexually Explicit Conduct without that person’s consent to either the Sexually Explicit Conduct or the production, publication, disclosure, or dissemination of the Content.” Order at 8.

<sup>5</sup> E.g., 18 U.S.C. §§ 2251 (criminalizes, among other acts, enticing or coercing any minor to engage in “any sexually explicit conduct for the purpose of producing any visual depiction of such conduct”); *id.* § 2252 (criminalizes knowingly transporting or shipping visual depictions involving minors engaged in sexually explicit conduct); *id.* § 2251A (making it a crime for “[a]ny parent, legal guardian, or other person having custody or control of a minor who sells or otherwise transfers custody or control of such minor, or offers to [do so] ... with knowledge that, as a consequence of the sale or transfer, the minor will be portrayed in a visual depiction” of CSAM); *id.* § 2252A



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The victims portrayed in CSAM and NCM have suffered tremendously.<sup>6</sup> In the case of CSAM, every single child depicted is the victim of a horrific crime—and Aylo’s alleged facilitation of a market for that content increases incentives to commit those crimes.<sup>7</sup> The Supreme Court has observed that CSAM “[i]s intrinsically related to the underlying abuse.”<sup>8</sup> One victim, who at nine years old was trafficked and forced to appear in pornographic content that “ended up on Pornhub and regularly reappear[ed] there,” put it this way: “Pornhub became my trafficker.”<sup>9</sup> Other victims have turned to drugs and attempted suicide because Aylo’s sites hosted and allowed users to re-upload and continue viewing CSAM and NCM depicting them for years.<sup>10</sup> Aylo was aware of this

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(criminalizing, among other acts, the knowing “transport[.]” “recei[pt] or distribut[ion],” “reproduct[ion],” “advertise[ment],” “s[ale] or possess[ion] with the intent to sell,” or “possess[ion], or ... access[.] with intent to view” child pornography); *id.* § 2260 (criminalizing, among other things, the coercion of “minor[s] to engage in ... any sexually explicit conduct for the purpose of producing any visual depiction of such conduct” or “transport[ation of] any minor with the intent that the minor engage” in that prohibited conduct); 15 U.S.C. § 6851 (allowing civil actions relating to the disclosure of intimate images); Take It Down Act, Pub. L. No. 119-12 (eff. May 19, 2026); Ala. Code § 13A-6-240 (criminally prohibiting distribution of intimate images); Haw. Rev. Stat. § 711-1110.9 (criminalizing revenge porn).

<sup>6</sup> See *The Children of Pornhub: Why Does Canada Allow This Company to Profit Off Videos of Exploitation and Assault?*, N.Y. Times (Dec. 4, 2020), <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>.

<sup>7</sup> Unrelated to this matter, litigation is pending against Aylo in which a federal court certified a class of CSAM victims who allege that Aylo violated sex trafficking and child pornography laws. See ECF No. 209, *Doe v. MindGeek*, No. SACV-21-003389-CJC (Nov. 17, 2023). That litigation is now pending summary judgment. ECF No. 375, Order, *Doe v. MindGeek*, No. SACV-21-003389-CJC (Aug. 14, 2024).

<sup>8</sup> *United States v. Stevens*, 559 U.S. 460, 471 (2010); see also *Osborne v. Ohio*, 495 U.S. 103, 110 (1990) (endorsing the fact that “the advertising and selling of child pornography ... are ... an integral part of the production of such materials”). There is also evidence linking the viewing of CSAM to the commission of crimes against children. Some studies have highlighted the connection between exposure to CSAM and increased likelihood of sexually abusing or molesting children. E.g., R. Hall, MD et al., *A Profile of Pedophilia: Definition, Characteristics of Offenders, Recidivism, Treatment Outcomes, and Forensic Issues*, Mayo Foundation for Medical Education and Research (Apr. 2007), <https://web.archive.org/web/20080528040559/http://www.mayoclinicproceedings.com/pdf%2F8204%2F8204sa.pdf>; C. Kim, *The Link Between Viewing Child Pornography and Molesting Children*, NDAA (2004), [https://ndaa.org/wp-content/uploads/Update\\_gr\\_voll\\_no3.pdf](https://ndaa.org/wp-content/uploads/Update_gr_voll_no3.pdf) (acknowledging that “statistical absolutes are impossible to draw in an arena such as this but evidence from actual investigations and experience tells us it is a small leap from viewing child pornography to molesting children”). Indeed, those who sexually abuse children themselves “acknowledge that exposure to [CSAM] ... plays an important part in leading them to commit hands-on sexual offenses against children.” Kim, *supra* at 2.

<sup>9</sup> N.Y. Times *supra* n.6 (explaining that because Pornhub continued to host that content, she “[was] still getting sold, even ... five years” after the sexual abuse ended and “may never be able to get away from this”).

<sup>10</sup> *Id.*; see also *Pornhub is Awash in Lawsuits by Hundreds Who Say They Never Consented to the Videos Uploaded on the Site*, Business Insider (Jul. 24, 2024), <https://www.businessinsider.com/pornhub-is-awash-in-lawsuits-unverified-videos-2024-7> (explaining that one such video had nearly three million views).



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content being perpetually re-uploaded, but did very little to prevent it. It profited from the increased traffic driven by CSAM and NCM despite complaints.<sup>11</sup>

As alleged in the complaint, Aylo changed its tune only when hosting CSAM and NCM endangered its bottom line. After Visa and Mastercard threatened to terminate their business relationships with Aylo and impose massive fines, Aylo audited its Tube Sites and one Pay Site, “turn[ing] up tens of thousands of CSAM and NCM videos and photos—all content that [Aylo had] solicited for upload.”<sup>12</sup> Even after subsequent audits revealed that multiple channels on its sites hosted and even publicly advertised CSAM and NCM for years, Aylo did not necessarily remove that content.<sup>13</sup> Aylo instead “suspended th[ose] channels . . . to avoid incurring any fines from credit card companies, but . . . later restored most of the[] channels and their content once the threat had passed.”<sup>14</sup> Of the thirty-five channels Aylo identified through an audit as hosting and advertising CSAM and NCM, it banned only five.<sup>15</sup> Even when Aylo “removed what [it] identified as illegal content” from certain channels, it “continued publishing content from the Content Partner” that owned and operated that channel “and distributing it through the channel.”<sup>16</sup>

Finally, Aylo caved. In the face of unrelenting public pressure and potential financial threats to its business, Aylo “removed over 10.5 million videos from Pornhub and limited future uploads to Content Partners and individuals who submitted documentation to establish their identities.”<sup>17</sup> Even still, the complaint alleges that Aylo’s “sites continue[d] to contain [thousands of] CSAM and NCM” videos.<sup>18</sup>

One may naturally ask what all of this has to do with the Federal Trade Commission (FTC). Federal and state criminal law directly prohibit and regulate CSAM and NCM. The FTC is a consumer-protection agency. So, why does the FTC need to get involved? We have been tasked

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<sup>11</sup> N.Y. Times, *supra* n.6; Business Insider, *supra* n.10 (noting that at least one CSAM and NCM video with millions of views remained “on Pornhub despite hundreds of comments saying . . . this is definitely child pornography [and t]hat girl can’t be any more than fourteen, thirteen” because “Pornhub *still* wouldn’t take it down, even when [the victim] messaged [Pornhub] multiple times” (emphasis added)).

<sup>12</sup> Compl. ¶¶ 66–74, 77–79.

<sup>13</sup> E.g., *id.* ¶¶ 67–86.

<sup>14</sup> *Id.* ¶ 72.

<sup>15</sup> *Ibid.*

<sup>16</sup> *Id.* ¶ 74.

<sup>17</sup> *Id.* ¶¶ 87–88.

<sup>18</sup> *Id.* ¶ 89 (noting that, even after removing 10.5 million videos, Aylo found *thousands* of CSAM and NCM videos that had been on its websites for over a year and were titled in ways that made clear the nature of that content).



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with policing unfair or deceptive acts or practices in or affecting commerce.<sup>19</sup> Aylo’s acts and practices were both unfair and deceptive.

First, distributing such content is an unfair practice.<sup>20</sup> Reasonable consumers do not want to view CSAM and NCM. It serves no socially acceptable purpose. Simply viewing such content has the potential to inflict deep psychological and moral wounds on a consumer, and the victims portrayed in the content are injured every time it is viewed.<sup>21</sup> Further, possessing CSAM exposes consumers to substantial criminal liability.<sup>22</sup> These injuries could not be reasonably avoided by consumers. At least some consumers who viewed and downloaded Aylo’s CSAM and NCM were unaware of the content’s character, and could not reasonably have determined that it was CSAM or NCM based on the information Aylo provided before viewing.<sup>23</sup> Finally, there are no countervailing benefits for the distribution of CSAM and NCM.<sup>24</sup> It is difficult to conjure any arguments in defense of CSAM and NCM, never mind ones that could outweigh the identified harms. Neither the intensity of consumer demand nor the availability of profit could justify the distribution of this content.

The second reason for the FTC to pursue this enforcement action is that Aylo profited from the distribution of CSAM and NCM for many years by deceiving consumers “both in the press and on their websites” to convince them that its business practices were all above board.<sup>25</sup> The FTC’s action today against Aylo rests on eight alleged misrepresentations. I want to highlight six allegations of deception relating to the proliferation of CSAM and NCM on the sites.<sup>26</sup>

**First**, Aylo told consumers, media, and business partners that “[c]ontent flagged by our community as inappropriate is promptly reviewed and removed if necessary.”<sup>27</sup> But the complaint alleges that Aylo’s “actual policy was only to review a video once it had received more than fifteen separate user flags.”<sup>28</sup> As a result, over the course of eight years, Aylo “amassed a backlog of over 700,000 active . . . videos [on Pornhub alone] with up to 15 user flags,” “many of which were for

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<sup>19</sup> 15 U.S.C. § 45(a).

<sup>20</sup> *Id.* § 45(n).

<sup>21</sup> See *supra* n.8.

<sup>22</sup> E.g., 18 U.S.C. § 2252A(a)(5)(B); see also *supra* n.5.

<sup>23</sup> Compl. ¶¶ 91–92.

<sup>24</sup> *Id.* ¶ 93.

<sup>25</sup> *Id.* ¶ 94.

<sup>26</sup> The complaint also alleges that Aylo violated the FTC Act by failing to disclose that sensitive personal information collected from consumers and held by vendors would also be shared with defendants, and misrepresenting its data security practices.

<sup>27</sup> *Id.* ¶ 98.

<sup>28</sup> *Id.* ¶¶ 96–106.



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CSAM and NCM,” “[and] had never been reviewed.”<sup>29</sup> Of the 70,000 videos Aylo eventually reviewed from that backlog, “30% ... w[ere] CSAM” and subsequently removed.<sup>30</sup>

**Second**, Aylo promised to ban users who uploaded CSAM onto its sites.<sup>31</sup> Instead, as alleged in the complaint, users who uploaded such content were able to make new accounts on the Tube Sites. Even when Aylo attempted to uphold its commitment, it fell short; it either “did not cross-ban CSAM uploaders across their websites”<sup>32</sup> or “merely prohibited the user from ... [using] the same username or email address,” allowing “numerous ‘banned’ users [to] create[] new accounts and continue[] upload[ing] CSAM to [Aylo’s] websites.”<sup>33</sup>

**Third**, Aylo claimed its “fingerprint[ing]” technology “prevent[s] CSAM from ever being re-uploaded to [its] websites.”<sup>34</sup> But the complaint alleges that, for four years, that technology “did not work effectively.”<sup>35</sup> “As a result, hundreds of videos that had previously been identified as CSAM were re-uploaded to [Aylo’s] websites, where they remained live for months before [Aylo] took them down again”—an issue Aylo knew about and that was reported on extensively.<sup>36</sup>

**Fourth**, Aylo claimed that it had obtained, reviewed, verified, and maintained copies of documentation of performers’ names and dates of birth to ensure that performers were adults.<sup>37</sup> But on many of its sites, the complaint alleges, Aylo did not require any such documentation for user-uploaded videos until December 2020 or January 2021.<sup>38</sup>

**Fifth**, the complaint alleges that Aylo repeatedly misrepresented to consumers, the general public, and even members of Congress that its “[m]oderation team reviews all content prior to it going live to ensure that CSAM and NCM do not go live on [its] websites.”<sup>39</sup> “In truth, . . . there were hundreds of thousands of videos on Pornhub [alone]” and “5 million videos on” a few of Aylo’s other sites “all linked to by Pornhub and . . . in the Pornhub network” “that had never been

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<sup>29</sup> *Id.* ¶¶ 103; cf. *supra* 1–3 & nn.6–10.

<sup>30</sup> Compl. ¶ 104.

<sup>31</sup> *Id.* ¶ 107.

<sup>32</sup> *Id.* ¶ 111 (“meaning that when a user was banned from one of [its] websites for uploading CSAM, [it] did not ban the user from any of their other websites even when they used the same email address and username on [Aylo’s] other websites”).

<sup>33</sup> *Id.* ¶ 112.

<sup>34</sup> *Id.* ¶¶ 113–14.

<sup>35</sup> *Id.* ¶¶ 113–15 (explaining that internal communications show Aylo knew of their broken technology for at least 9 months).

<sup>36</sup> *Id.* ¶¶ 114–15; see also, e.g., *supra* 1–3 & nn.6–7, 9–10.

<sup>37</sup> Compl. ¶¶ 116–17.

<sup>38</sup> *Id.* ¶¶ 116–19.

<sup>39</sup> *Id.* ¶¶ 120–34.



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reviewed by th[at] team.”<sup>40</sup> And the individual review process managed by Aylo’s content moderation team was largely meaningless, perhaps deliberately so. Aylo handicapped its moderators by “limit[ing] the number of videos that [they] could remove from [the] websites, regardless of the illegality of the content,” and in some instances limited that number to less than 1% of the content uploaded onto certain sites.<sup>41</sup> Aylo further “limit[ed] the review of each video to one moderator” who “routinely d[id] not [even] listen to the entirety of the video[ a]nd, in some instances, ... d[id] not understand the language spoken in the[m].”<sup>42</sup> Moderators reviewed, on average, over two thousand videos and photos in an eight-hour shift, which “amounted to a moderator watching on average, only 39 seconds of each video that they reviewed.”<sup>43</sup>

**Last**, Aylo has continued to promise consumers that their “policies, and practices, and procedures work together to ensure there is no CSAM or NCM on their websites.”<sup>44</sup> As I have explained, and as is alleged in the complaint, that promise could not be further from the truth.

Given Aylo’s deplorable conduct, the Commission and the State of Utah filed a complaint and consent agreement in the U.S. District Court for the District of Utah settling claims that Aylo violated Section 5 of the Federal Trade Commission and the Utah Consumer Sales Practices Act. The Commission claims that Aylo engaged in unfair conduct by distributing CSAM and NCM to consumers<sup>45</sup> as well as made numerous deceptive representations to consumers.<sup>46</sup> We further allege that Aylo violated Section 5 by deceiving consumers about its privacy and security practices.<sup>47</sup> Utah’s claims rely on similar facts.<sup>48</sup>

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<sup>40</sup> *Id.* ¶ 124.

<sup>41</sup> *Id.* ¶ 126.

<sup>42</sup> *Id.* ¶ 128.

<sup>43</sup> *Id.* ¶ 129.

<sup>44</sup> *Id.* ¶¶ 135–41.

<sup>45</sup> *Id.* ¶¶ 7, 91–93, 165–67.

<sup>46</sup> *Id.* ¶¶ 168–185.

<sup>47</sup> *Id.* ¶¶ 142–47, 186–88 (alleging that Aylo failed to disclose that it “collect[ed] and retain[ed] consumers’ sensitive personal information from the [third-party] Vendor” that Aylo said it “used ... to collect, verify, and secure consumers’ identification documentation”); *id.* ¶¶ 149–54, 189–91 (documenting Aylo’s “unreasonable data security practices” such as “regularly disregard[ing] [its] protocols by failing to secure [its] database storing ... identification documents ... [and] instead emailing unencrypted copies of consumers’ verification images, identification documents, passports, driver’s licenses, Social Security numbers, and birth certificates to numerous employees who are not supposed to have access to the documents” despite its representations to the contrary).

<sup>48</sup> *Id.* ¶¶ 195–205.





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The order that we have asked the district court to enter against Aylo will help ensure that Aylo never again profits from the distribution of CSAM and NCM.<sup>49</sup> Aylo will be required to create a “CSAM and NCM Prevention Program” that allows anyone to report actual or suspected CSAM and NCM on its website. In response to such reports, Aylo will be required promptly to suspend and, where appropriate, remove the content.<sup>50</sup> Aylo will have to review all user-uploaded content before publication<sup>51</sup> to verify that each depicted individual is an adult who consented to the production and publication of the content.<sup>52</sup> Unless Aylo concludes that the individuals depicted are consenting adults, Aylo may not distribute the content.<sup>53</sup> Aylo will additionally have to honor Withdrawal of Consent requests through which individuals depicted in published content can withdraw consent and have the content removed.<sup>54</sup> The order also requires Aylo to remove users’ comments or direct messages that encourage or solicit CSAM or NCM, or encourage or engage in child abuse or non-consensual sexual activities.<sup>55</sup> Aylo is required to ban users who engage in the above misconduct.<sup>56</sup>

Aylo is further required to post a notice of this matter to all of its sites.<sup>57</sup> Specifically, for a period of two years, Aylo must “post Clearly and Conspicuously on the landing pages for each [of its sites], a link to [a] . . . notice” disclosing this Commission and Utah’s allegations that its sites “made available videos and photos containing . . . CSAM[] as well as . . . NCM.”<sup>58</sup> That notice will also inform consumers that Aylo settled the matter with the Commission and Utah and, as part of that settlement, it must implement the CSAM and NCM Prevention Program “with [particular] robust safeguards.”<sup>59</sup> Coming from an entity that the complaint alleges refused, for years, to own up to its egregious wrongdoing,<sup>60</sup> this notice is a major victory for countless victims

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<sup>49</sup> The order also requires Aylo to create a Privacy and Information Security Program and related injunctive relief to help ensure Aylo no longer fails to protect or deceives consumers with its privacy and security practices. See ECF No. 2, Order §§ IX–XII (Sept. 3, 2025).

<sup>50</sup> *Id.* § III.E.7, III.E.9, III.E.11.

<sup>51</sup> *Id.* at 6 (defining “Content” as “any depiction of Sexually Explicit Conduct, including but not limited to a photograph, film, video, picture, audio recording, or computer-generated image”).

<sup>52</sup> *Id.* § III.E.2.a.1–2. The order also contemplates that where “the creation date is unavailable,” Aylo can use the age of the individual at “the time the Content was uploaded.” *Ibid.*

<sup>53</sup> *Id.* § III.E.1–3.

<sup>54</sup> *Id.* § III.E.10.

<sup>55</sup> *Id.* § III.E.15.

<sup>56</sup> *Ibid.*; see also *id.* § III.E.13–14.

<sup>57</sup> *Id.* at 4; *id.* § VII.

<sup>58</sup> *Id.* § VII; *id.* Ex. A.

<sup>59</sup> *Id.* Ex. A (listing out specific safeguards related to preventing publication of CSAM and NCM content on its sites and ensuring effective removal of that content from its sites).

<sup>60</sup> E.g., *supra* pp. 1–6 (Aylo refusing to even acknowledge its own shortcomings despite the numerous public reports, victims’ accusations, and even Senators’ inquiries).



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of sexual abuse. The notice will ensure consumers remain vigilant to the CSAM and NCM they might encounter on Aylo's sites—both to help them avoid it and so they can spot and report it.

This momentous order complements recent actions by Congress and the Trump-Vance Administration to combat the proliferation of non-consensual intimate visual depictions.<sup>61</sup> For example, Congress recently enacted the Take it Down Act (TIDA), landmark legislation championed by the First Lady, that protects victims of non-consensual intimate visual depictions by, among other things, imposing notice-and-takedown provisions on covered platforms.<sup>62</sup> TIDA requires covered platforms to remove prohibited content within 48 hours after receiving a “valid removal request” from the individual depicted or the individual's representative.<sup>63</sup> In light of the repeated, serious misconduct that the complaint alleges against Aylo, the order we propose today will broaden Aylo's obligations even further and require it to affirmatively review all content before posting it to ensure that it is neither CSAM nor NCM. The order will also require that Aylo take down CSAM or NCM when requested by anyone, not just the individuals depicted in the content or their representatives.

Today's order is permanent, and I will do everything in my power to ensure that Aylo is held to it. I am deeply grateful to the staff of the Division of Privacy and Identity Protection and to the leadership of the Bureau of Consumer Protection for their extraordinary work on this groundbreaking case. They conducted a top-notch and thorough investigation into Aylo's conduct and obtained this injunction that will protect millions of Americans in the future. Their work on this case is an example of the FTC at its very best.

The United States is drowning in pornography, with dire consequences for the common good of the people of our nation.<sup>64</sup> Judicial decisions of the mid-twentieth century have foreclosed

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<sup>61</sup> Congress has not given the Commission authority to obtain monetary redress for the sort of Section 5 violations that Aylo allegedly committed. See *AMG Capital Mgmt. LLC v. FTC*, 593 U.S. 67 (2021). I have long called on Congress to grant the Commission authority to obtain monetary redress for consumers in at least some Section 5 cases. See, e.g., A Conversation with FTC Commissioner Andrew Ferguson Hosted by Alden Abbott, Mercatus (June 13, 2024), <https://www.mercatus.org/economic-insights/event-videos/conversation-ftc-commissioner-andrew-ferguson-hosted-alden-abbott> (“Congress should restore to the Commission power that resembles the power we thought we had under Section 13(b).”). I agree with Commissioner Meador that the Commission would have pursued monetary relief for consumers in this case had Congress granted us the power to do so.

<sup>62</sup> Pub. L. No. 119-12 § 3(a)(3)(A)–(B).

<sup>63</sup> *Id.* § 3(a)(1)(B).

<sup>64</sup> See The Public Health Harms of Pornography, NCOSE (Feb. 2018), available at [https://endsexualexploitation.org/wp-content/uploads/2021/04/NCOSE\\_SymposiumBriefingBooklet\\_1-28-2.pdf](https://endsexualexploitation.org/wp-content/uploads/2021/04/NCOSE_SymposiumBriefingBooklet_1-28-2.pdf) (“Drawing from recent peer-reviewed research literature, as well as the latest reports and surveys, the research summary herein presents evidence supporting the view that pornography constitutes a public health crisis” that





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many of the tacks that States and Congress have tried to take to protect families from this flood.<sup>65</sup> The FTC does not regulate pornography. But Congress has empowered it to require all merchants to play by the rules and desist from deception and unfairness. There is no First Amendment exception to these rules for pornographers. And the FTC under President Trump has focused intently on protecting children. That is why the FTC today acts to protect children, women, and all consumers from those who would profit from the shockingly unscrupulous behavior in which Aylo is alleged to have engaged.

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involves a “broad array of harms ... includ[ing] higher incidence of STIs, increased verbal and physical sexual aggression, acceptance of rape myths, risky sexual behaviors among adolescents, reduced impulse control and reckless decision making, increased sexual dysfunction, and more.”). While much of this statement and the focus of many with respect to the harms of CSAM, NCM, and child pornography are about women, men and boys too are victims of these consequences. E.g., *Twisting Masculinity: Harms of Pornography to Young Boys and Men*, 2 Dignity 1, 3 & nn.3–8 (2017), available at <https://digitalcommons.uri.edu/cgi/viewcontent.cgi?article=1075&context=dignity> (discussing the “most common effects” men report as a result of consuming pornography as evidenced by studies, including a paper by U.S. Navy urologists and psychologists).

<sup>65</sup> A. Candeub, *How the Supreme Court Can Protect Digital Childhood*, Law & Liberty (Jan. 9, 2025), <https://lawliberty.org/how-the-supreme-court-can-protect-digital-childhood/>; but see *Free Speech Coalition v. Paxton*, 606 U.S. ---, 145 S. Ct. 2291 (2025) (holding that laws requiring age verification to access pornographic content are not subject to strict scrutiny).