

**GUIDELINES ON IDENTIFIERS  
OF ONLINE ENTICEMENT AND  
CHILD SEX TRAFFICKING**  
**POTENTIAL VIOLATIONS OF  
18 U.S.C. § 1591 AND § 2422(B)**

as referenced in the [REPORT Act](#)

Released October 29, 2024



NATIONAL CENTER FOR  
**MISSING &  
EXPLOITED**  
CHILDREN®

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**The Revising Existing Procedures On Reporting via Technology Act** (the “REPORT Act”) was enacted May 7, 2024, to “amend title 18, United States Code, to strengthen reporting to the CyberTipline related to online sexual exploitation of children....” Section 4 the REPORT Act provides as follows:

- (b) GUIDELINES.—Not later than 180 days after the date of enactment of this Act, the National Center for Missing & Exploited Children may issue guidelines, as appropriate, to providers required or permitted to take actions described in section 2258A(a)(1)(B) of title 18, United States Code, on the relevant identifiers for content that may indicate sex trafficking of children, as described in section 1591 of that title, or enticement, as described in section 2422(b) of that title.



**The information provided in this document does not, and is not intended to, constitute legal advice. This document is provided only for informational purposes consistent with the REPORT Act. The guidance provided here and in any associated appendix does not create any obligation on the part of any entity beyond the obligations, if any, under the REPORT Act and related laws.**

Providers are encouraged to take steps to prevent and combat the use of their services to sexually exploit children. When making a CyberTipline report to NCMEC, providers may include images, videos and other files related to an apparent child sexual exploitation incident. Robust reporting and inclusion of all available relevant information, including uploaded files and user information relating to both apparent offenders and apparent child victims, is crucial to ensure a CyberTipline report is informative and can be used to recover and safeguard child victims and counter online child sexual exploitation.



*Throughout this document, the term “provider” refers to entities required or permitted to take actions under 18 U.S.C. § 2258A(a)(1)(B). NCMEC recommends that providers not already registered to report to the CyberTipline contact [ESPteam@ncmec.org](mailto:ESPteam@ncmec.org) to learn more about registering.*

# ENTICEMENT OF A MINOR

## AS DEFINED IN 18 U.S.C. § 2422(B)

### RELEVANT STATUTORY TEXT:

#### 18 U.S.C. § 2422(b). Coercion and enticement

Whoever, using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be fined under this title and imprisoned not less than 10 years or for life.

“Online enticement of children for sexual acts” — or simply “online enticement” — is one of eight CyberTipline reporting categories, and may include reports concerning grooming; engaging in sexualized conversation or conduct with a child; the exchange or solicitation of nude images or child sexual abuse material (CSAM); enticement to meet a child in person for sexual purposes; and blackmail or sextortion of a child that is sexually or financially motivated. See below for additional detail.

#### SUB-CATEGORIES OF ONLINE ENTICEMENT:

**Online enticement for sexual imagery or conduct** is typically sexually motivated and driven by an intent to entice the child to engage in sexual chat or conversation, produce and share sexually exploitative or abusive material of themselves or other children, meet in-person for a sexual encounter and/or offend against another child or animal. The grooming process can occur quickly or may take longer to build the rapport and trust with the child.

**Online enticement to travel** involves offenders seeking to entice, coerce or manipulate children into meeting in person. This is high-risk conduct that may result in a child being subjected to hands-on sexual abuse and/or abduction. Relevant indicators that an in-person meeting is scheduled or being discussed include a child sharing identifying information relating to their location (e.g., address, school name, phone number) or any indication that a child and offender have previously met in-person for a sexual encounter.

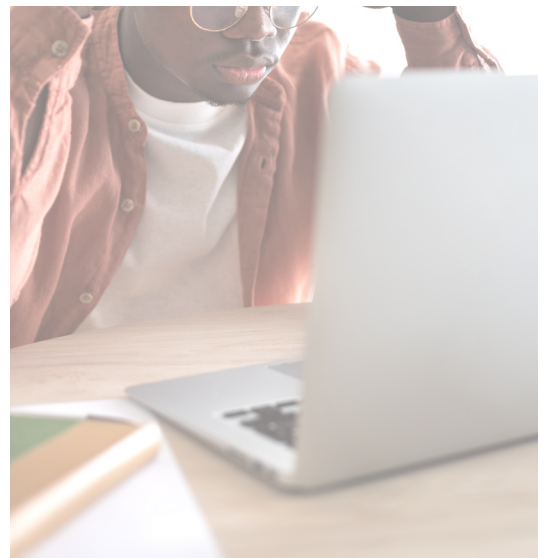
**Sextortion** is a form of online enticement where a child is blackmailed, most often with a threat that nude or sexual imagery of them will be shared publicly or with family and friends, by a person who demands that the child create and send additional exploitative or abusive



*When reported conduct includes indicators of a child being enticed “to engage in prostitution,” it is helpful for the provider to select the CyberTipline incident type “Child Sex Trafficking.”*



*Indicators of online enticement, particularly in communications between a child and an offender, may be clear in a brief interaction (as is common in aggressive, financially motivated sextortion) or occur over long periods of time (as is common in sexually motivated grooming).*



material, meet in person to engage in sexual activity or pay the blackmailer a sum of money. Sextortion or coercive forms of online enticement often include offender behaviors like those associated with online enticement for sexual imagery or conduct as described above. At some point, often very quickly, offender behavior may become explicitly malicious and aggressive, with demands for financial payment, additional sexual conduct or other actions by the child to prevent the offender's disclosure of exploitative or abusive images or sensitive information.

### INDICATORS:

While offenders may use a variety of tactics when enticing a child or children online, the following are frequently seen offender tactics within CyberTipline reports.

**Approaching a child on social media, gaming or other platforms** after accessing the child's profile(s) to learn about the child's interests, school, location, friends and family. Offenders may also leverage information available on social media to learn more and exploit children with particular vulnerabilities (e.g., eating disorders, mental health challenges, LGBTQ+ identity.). Typically, after initial contact is made, offenders attempt to move the child to communicate over private messaging apps or platforms or otherwise obfuscate their communications with the child.

**Establishing a friendship or romantic relationship with a child**, often by pretending to be an age-appropriate peer or love interest. In these instances, offenders frequently create fictitious accounts using imagery depicting attractive young women or men whom they pretend to be. Offenders may create multiple accounts or personas to vouch for the enticing persona.

**Offering something of value to the child**, whether money, goods or support for the child's goals. For example, offering to pay the child to take and send nude images or pretending to work as a recruiter in a professional field, such as a modeling agency.

**Employing scare tactics by threatening the child** with violence or claiming they already have sexual images or videos of the child, either by having hacked their devices or accounts or by receiving images or videos of the child from someone else. An offender also may create synthetic or generative AI content depicting the child in sexually explicit situations based on innocuous images publicly available online. In these instances, the child may have never previously engaged with or sent sexual imagery to the offender before the offender threatens them.



*In recent reports of financial sextortion, teen boys are most often the targets. In many cases, offenders impersonate a female who wants to trade pictures. Once the targeted boy sends the requested images, the offender demands money, gift cards or threatens to post the images online. These scenarios can happen quickly, and some have resulted in tragic outcomes with children taking their own lives.*



*Providers: See Appendix section 1(a) for examples/additional detail.*



*Providers: See Appendix section 1(b) for examples/additional detail.*



*Providers: See Appendix section 1(c) for examples/additional detail.*



*Providers: See Appendix section 1(d) for examples/additional detail.*

# SEX TRAFFICKING OF CHILDREN AS DESCRIBED IN 18 U.S.C. § 1591

## RELEVANT STATUTORY TEXT:

### 18 U.S.C. § 1591. Sex trafficking of children or by force, fraud, or coercion

(a) Whoever knowingly-

- (1) in or affecting interstate or foreign commerce...recruits, entices, harbors, transports, provides, obtains, advertises, maintains, patronizes, or solicits by any means a person; or
- (2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1), knowing, or except where the act constituting the violation of paragraph (1) is advertising, in reckless disregard of the fact, that means of force, fraud, coercion described in subsection (e)(2), or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall be punished as provided in subsection (b).

\* \* \*

(e) In this section:

\* \* \*

- (3) The term "commercial sex act" means any sex act, on account of which anything of value is given to or received by any person.

\* \* \*

- (6) The term "venture" means any group of two or more individuals associated in fact, whether or not a legal entity.

Child sex trafficking is a form of child abuse that occurs when a child under 18 is advertised, solicited or exploited through a commercial sex act. A commercial sex act is any sex act where something of value is given to or received by any person for sexual activity.

For the purpose of this guidance, the term "child" means an individual under the age of 18. This includes both (1) a specific individual child that may be offered by a trafficker for commercial sex or identifiable by a provider through internal data and signal analysis and (2) an unspecified child who may be sought by a commercial sex buyer. NCMEC refers to sex trafficking of children as child sex trafficking or CST.



*Providers reporting apparent instances of child sex trafficking on their service are encouraged to use the CyberTipline incident type "Child Sex Trafficking." When appropriate, additional incident types may be added through tags and/or "Additional Information" fields.*

## SUB-CATEGORIES OF CHILD SEX TRAFFICKING:

### Non-Familial

Child is targeted, groomed and exploited by an unrelated individual, male or female, who often develops an intentional relationship with the child based on their needs or vulnerabilities, which is later used as leverage in the exploitation. The targeting and grooming can begin online or in-person.

### Familial

Child is sex trafficked by their biological father and/or mother, relative, foster/adoptive parent or significant other of parent.

### Gang-Controlled

Child is sex trafficked by a gang or member of a gang/set/cliq.

### Buyer-Perpetrated

Buyer is directly exploiting the child's vulnerabilities by offering something of value to the child in exchange for the sex acts. Child is being sex trafficked without a trafficker.

## PARTIES INVOLVED IN CHILD SEX TRAFFICKING:

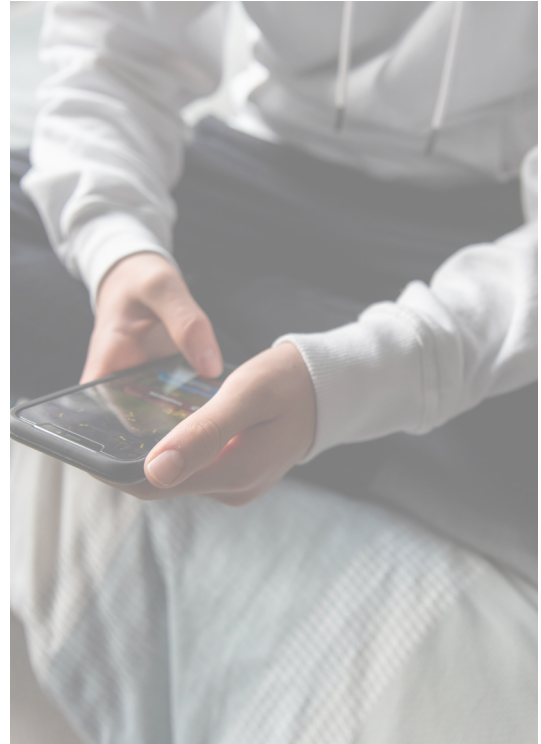
There are typically, but not always, three parties involved in an incident of child sex trafficking: a victim and two types of offenders – a trafficker and a buyer. In other circumstances, child sex trafficking may look more like an organized ring or network of traffickers and/or buyers.

### Victims

Children, including male, female and transgender youth of any race, ethnicity, nationality and socioeconomic level, may be victimized through sex trafficking. Those with particular vulnerabilities may be more frequently targeted by traffickers and buyers.

### Traffickers

Offenders involved in targeting, grooming, controlling, advertising and/or selling/trading of children for the purpose of sex abuse by a buyer for commercial benefit. Traffickers use psychological pressure, false promises, acts of perceived love/support and intimidation to control and sexually exploit the child for their benefit. Traffickers are often directly involved in sexually abusing the child under their control as a means of grooming, training, controlling and advertising the child. Traffickers may include but are not limited to known individuals with access to the child such as caregivers (e.g., mothers, fathers, foster parents), intimate partners, teachers, coaches, religious leaders and gang members. They also may include individuals the child has only met online, which served as the starting point for building the relationship and grooming prior to the in-person commercial sexual exploitation.



*Providers: See Appendix section 2(a) for examples/additional detail.*

## Buyers

Offenders involved in the direct sexual abuse of a child where they have offered/provided something of value (either directly to the child or to the trafficker) in exchange for a sex act. Buyers can be male or female offenders of any race, ethnicity and socioeconomic level.

Providers have a unique opportunity to detect child sex trafficking at different stages of the victimization. Different indicators may be relevant at different stages of victimization. Understanding the various forms of child sex trafficking and indicators creates opportunities for prevention, identification and response.

## INDICATORS:

Persons involved in child sex trafficking have developed and commonly use terminology, slang, phrases and emojis to communicate about various aspects of the crime. While any one term alone may not establish the existence of child sex trafficking in any particular context, this vocabulary is an important resource that can be **combined** with other signals (such as age and other indicators of activity) to identify conduct related to suspected child sex trafficking.

### Commercial sex terminology (generally)

Persons involved in commercial sex use a shared vocabulary of standard and slang terminology.

### Indirect indicators of commercial sex

Commercial sex can be identified through direct references to money, payment and exchanges of something of value. Indirect indicators of commercial sex may include usernames, links or other references to peer-to-peer payment services or escort sites. Abbreviations may be used to describe specific sex acts or periods of time and corresponding fees.

### Commercial sex terminology in context

While individual terms may be helpful, child sex trafficking is more likely involved when the use of commercial sex terminology is combined with discussion or awareness of a child's age and other aspects of child sex trafficking, including advertising, a buyer seeking sexual services, familial trafficking, negotiating a meetup and recruitment.



*Under U.S. law, the involvement of a trafficker is not a required element of a sex trafficking offense. A buyer who offers anything of value in exchange for a sex act also commits sex trafficking of a child.*



*A commercial benefit includes money and anything else of value, such as drugs, food, shelter, transportation, medical care, job promotions, access to another child for sexual abuse, etc.*



*Providers: See Appendix section 2(b) for examples/additional detail.*



*Providers: See Appendix section 2(c) for examples/additional detail.*



*Providers reporting apparent instances of child sexual abuse material for sale on their service without other indicators of child sex trafficking are encouraged to use the CyberTipline incident type "Child Pornography." When appropriate, additional incident types may be added through tags and/or "Additional Information" fields.*



*Providers: See Appendix section 2(d)-2(j) for examples/additional detail.*



*Commercial sex terminology, when used to inform strategies for keyword search and semantic search (to locate different expressions with similar meanings), may support efforts to detect child sex trafficking on online platforms.*



## **ADDITIONAL GUIDANCE: CHILD SEXUAL ABUSE MATERIAL (CSAM)**

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Pursuant to the REPORT Act, NCMEC is issuing these guidelines relating to indicators of online enticement and child sex trafficking. However, conduct related to those offenses is often inextricable from conduct related to other forms of online child sexual exploitation, such as the manufacture, possession and distribution of CSAM (referred to as “child pornography” under 18 U.S.C. § 2256(8)). Therefore, NCMEC offers this additional guidance regarding CSAM as a supplement to the guidelines.

### **RELEVANT STATUTORY TEXT:**

#### **18 U.S.C. § 2256. Definitions for chapter**

For the purposes of this chapter, the term-

- (1) "minor" means any person under the age of eighteen years;
- (2) (A) Except as provided in subparagraph (B), "sexually explicit conduct" means actual or simulated-
  - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex;
  - (ii) bestiality;
  - (iii) masturbation;
  - (iv) sadistic or masochistic abuse; or
  - (v) lascivious exhibition of the anus, genitals, or pubic area of any person;
- (B) For purposes of subsection 8(B) of this section, "sexually explicit conduct" means-
  - (i) graphic sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex, or lascivious simulated sexual intercourse where the genitals, breast, or pubic area of any person is exhibited;
  - (ii) graphic or lascivious simulated;
    - (I) bestiality;
    - (II) masturbation; or
    - (III) sadistic or masochistic abuse; or
  - (iii) graphic or simulated lascivious exhibition of the anus, genitals, or pubic area of any person;
- (3) "producing" means producing, directing, manufacturing, issuing, publishing, or advertising;

\* \* \*

- (5) "visual depiction" includes undeveloped film and videotape, data stored on computer disk or by electronic means which is capable of conversion into a visual image, and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format;
- (6) "computer" has the meaning given that term in section 1030 of this title;

\* \* \*

- (8) "child pornography" means any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where-
  - (A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct;
  - (B) such visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaging in sexually explicit conduct; or
  - (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.
- (9) "identifiable minor"-
  - (A) means a person-
    - (i) (I) who was a minor at the time the visual depiction was created, adapted, or modified; or
    - (II) whose image as a minor was used in creating, adapting, or modifying the visual depiction; and
    - (ii) who is recognizable as an actual person by the person's face, likeness, or other distinguishing characteristic, such as a unique birthmark or other recognizable feature; and
  - (B) shall not be construed to require proof of the actual identity of the identifiable minor.

\* \* \*

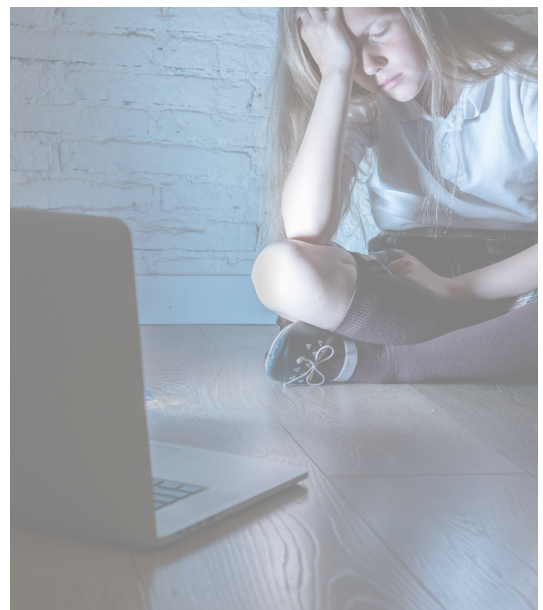
- (11) the term "indistinguishable" used with respect to a depiction, means virtually indistinguishable, in that the depiction is such that an ordinary person viewing the depiction would conclude that the depiction is of an actual minor engaged in sexually explicit conduct. This definition does not apply to depictions that are drawings, cartoons, sculptures, or paintings depicting minors or adults.

## TERMINOLOGY:

NCMEC refers to visual depictions described in 18 U.S.C. § 2256(8) as "child sexual abuse material" (CSAM) and encourages others to also use this term rather than "child pornography." In 2024, the term "child sexual abuse material" replaced "child pornography" in 34 U.S.C. § 11293 (NCMEC's congressional authorization).

## INDICATORS:

The ongoing circulation of CSAM is widely recognized as an additional and significant harm suffered by survivors of abuse depicted in CSAM.



Because of this, NCMEC encourages providers to use a multi-faceted approach to detect and combat CSAM on their platforms, which may include any of the following:

**Utilizing human moderators to visually verify**

**content** as conforming to the definition of “child pornography” in U.S. federal law.

**Utilizing cryptographic and perceptual hashes to detect known CSAM** as compiled in hash sets curated by NCMEC, industry groups or other organizations which can support detecting, removing and reporting suspected CSAM.



*Providers: Contact NCMEC at [ESPteam@ncmec.org](mailto:ESPteam@ncmec.org) for more information about hash-sharing initiatives.*

**Analysis of signals and behaviors** may assist in detecting CSAM and related conduct. Providers are best positioned to determine which combinations of certain behaviors and signals on their respective platforms might be indicators of potential CSAM offenses. These determinations can be informed by NCMEC’s guidance in this document and elsewhere.

**Image classifiers** can detect visual content that may be CSAM not previously categorized and added to hash sets. Such material may be newly produced or not previously circulated and may indicate a child in imminent or ongoing abuse and exploitation.

**REPORTING TO THE CYBERTIPLINE:**

When reporting CSAM to the CyberTipline, providers are encouraged to utilize available file annotations to aid in labeling and categorizing the reported content:

**The Tech Coalition’s Industry Classification System** is “a standardized classification framework [enabling] NCMEC and other third-party reviewers to quickly sort the voluminous amount of reported content and help identify the most egregious material.” (Tech Coalition)

**NCMEC file annotation**

NCMEC offers options for providers to label CSAM files when reporting to the CyberTipline, including:

- Anime/Drawing/Virtual/Hentai: file depicts anime, drawing, cartoon, virtual or hentai content.
- Bestiality: file depicts sexual conduct with an animal.
- Generative AI: file depicts content believed to have been created or altered with generative artificial intelligence.
- Infant: file depicts an infant.
- Live Streaming: file depicts content that was streamed live at the time it was uploaded.
- Physical Harm: file depicts an intentional act of causing physical injury or trauma to a person.
- Possible Self-Production: file depicts content that is believed to be self-produced.
- Potential Meme: file is shared or posted out of mimicry or for seemingly poor comedic effect.
- Violence/Gore: file depicts graphic violence, including but not limited to acts of brutality or detailed or vivid gruesomeness.
- Viral: file is circulating rapidly from one user to another.

## IMPORTANT DETAILS ABOUT AGGRAVATING CIRCUMSTANCES

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The inclusion of relevant details is essential to ensure that CyberTipline reports are useful for protecting children. Particularly when certain aggravating factors exist, NCMEC encourages providers to include detailed information so that the nature of suspected abuse or exploitation is clear, enabling more appropriate responses. Such factors may include, but are not limited to:

- **Indicators of possible production of new CSAM** involving the recent or ongoing abuse or exploitation of a child, including but not limited to CSAM produced in response to specific enticement, CSAM not previously included in hash lists, CSAM with metadata indicating recent production or possible first-generation distribution (e.g., location and/or device details in EXIF), etc.
- **Indicators of possible active online advertisement or negotiations offering a child for sexual purposes.** This may present through the linking to an online escort site, dating site or social media text that features the child for sale or active text that appears to indicate live negotiations related to making a child available for sexual exploitation or commercial sex.
- **Self-harming behavior or expressions, by a child victim, of suicidal ideation or other distress** (anxiety, hopelessness, fear, isolation, etc.) that may lead to self-harm.
- **Offender entices or coerces victims to engage in sexual conduct, physical abuse or production of CSAM involving other children or animals to which they have access.** This may be sexually motivated or a purely manipulative effort to further harm the child.
- **Offender is in close proximity to the child** (based on chat logs, listed profile locations, IP address geolocation or other account signals). This increases risk that the offender may know the child offline or can easily gain access to the child.
- **Indicators or signals indicate the high probability that the offender has immediate access to the child and intends to travel with them.**
- **Offender has access to children** in the home as a parent or caregiver, via their employment or any position of trust or authority (teacher, coach, mentor, spiritual or religious leader, first responder, health care provider, law enforcement officer, babysitter, camp counselor, etc.).
- **Offender has history of violence or crimes against children** (e.g., individual is a registered sex offender or the subject of open-source reporting about investigation, arrest or prosecution for violent crimes).



*When aggravating circumstances require an urgent response due to the threat of imminent harm to a child, providers submitting a CyberTipline report are encouraged to use the escalation field and include details about those circumstances.*

## APPENDIX

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An appendix containing examples from CyberTipline reports submitted to NCMEC and additional details related to the guidelines in this document is available to providers upon request.

# REPORT Act Guidance for Providers

National Center for Missing & Exploited Children  
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[NCMEC.org](https://www.ncmec.org)

