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ALVIN L. BRAGG, JR.
DISTRICT ATTORNEY

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Neal Mohan
Chief Executive Officer
Google LLC, D/B/A YouTube
901 Cherry Avenue
San Bruno, CA 94066

Dear Mr. Mohan,

I am writing in my capacity as the Manhattan District Attorney about concerns over YouTube's hosting of videos on how to make and manufacture so-called "ghost guns," as well as the algorithms that push these videos onto the screens of young children. Privately made firearms, commonly referred to as "ghost guns," are firearms that have been completed, assembled, or produced by a person other than a licensed manufacturer without serial numbers.¹ These guns are available without a background check and can be difficult if not impossible to track. They can be 3-D printed or assembled from individual parts, and instructions for both methods are not only available on YouTube, but actively recommended to children interested in video games.

A 2023 report by the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF") found that between 2017 and 2021, there was a 1,083% increase in the number of ghost guns recovered by law enforcement agencies from potential crime scenes and submitted to ATF, including 692 used in homicides or attempted homicides.² Between 2020 and 2021 alone the number of recovered and submitted ghost guns more than doubled from 8,504 to 19,273.³ ATF also believes that these numbers underrepresent the number of ghost guns recovered—and they do not even begin to take into account the ghost guns that remain on the streets.

In New York City, the NYPD reported a significant increase in ghost guns seized on the streets over the past four years. In 2020, 150 ghost guns were seized; in 2021, this increased to 263 ghost guns; in the past two years, the total number seized was 825.⁴

Letters sent to YouTube from Everytown for Gun Safety in 2021 and the United States Senate in 2022 both detail how YouTube's Community Guidelines specifically prohibit content instructing viewers on how to create these guns. The Community Guidelines explicitly state that "content intended to sell

¹ Bureau of Alcohol, Tobacco, Firearms, and Explosives, *Privately Made Firearms* (2023), <https://www.atf.gov/firearms/privately-made-firearms>

² *National Firearms Commerce and Trafficking Assessment: Crime Guns – Volume Two* (Bureau of Alcohol, Tobacco, Firearms, and Explosives, 2023), Part III; 5

³ *National Firearms Commerce and Trafficking Assessment: Crime Guns – Volume Two*, 6

⁴ *NYPD Unit Combating the Growing Problem of Ghost Guns*, (Spectrum News, 2023), <https://ny1.com/nyc/all-boroughs/public-safety/2023/09/20/nypd-unit-combatting-the-growing-problem-of-ghost-guns>

firearms, instruct viewers on how to make firearms, ammunition, and certain accessories, or instruct viewers on how to install those accessories is not allowed on YouTube.”⁵ Yet this content continues to persist on the platform. A cursory search for “how to print a 3D gun” on YouTube immediately brings up instructional videos that clearly violate the Community Guidelines.

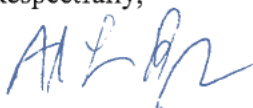
Perhaps even more troubling is the publicly reported evidence that these videos that should not be available are being actively pushed by YouTube’s algorithms to minors who begin watching clips of video games. A 2023 study by the Tech Transparency Project created four test YouTube accounts—two identifying as 9-year-old boys and two identifying as 14-year-old boys—and used these accounts to play at least 100 gaming videos. The YouTube algorithm then began pushing content on shootings and weapons, including instructional videos about ghost guns, to all four accounts, regardless of whether the accounts interacted with the recommended videos or not.⁶ These videos not only violated the Community Guidelines, but they were not even age restricted. Additionally, even for parents actively trying to keep their children safe, there is no way to turn off the YouTube recommendation system.

As identified by the Tech Transparency Project, the video game to ghost gun manufacturing path is playing out in homes across New York City. In a number of cases before my office, young individuals who are being investigated for ghost gun possession and manufacturing tell a similar story and have explicitly stated they have learned to build ghost guns on YouTube – with some learning how to do so in less than an hour. The bottom line is that allowing videos on the platform that instruct users on how to create dangerous, difficult to trace weapons, and actively targeting children with these videos, leads to the proliferation of ghost guns and the illegal possession of dangerous firearms by our most vulnerable.

There are numerous examples of YouTube removing videos once they are called out by gun safety groups or the media. This signals to me that YouTube does stand by its Community Guidelines. However, these reactive strategies do not go far enough. YouTube must revise its content moderation strategies to take a proactive role in both making sure that current videos demonstrating how to create ghost guns are removed, and future videos are prohibited from being uploaded. Additionally, YouTube must modify its algorithms to immediately stop recommending videos with violent content, including those modeling ghost guns, to children. There should also be an option to turn off recommendations altogether for those who choose. I believe these steps are a public safety imperative to protect New York City residents, and especially our children from going down a dangerous path.

In order to facilitate these necessary changes, I respectfully request a meeting with representatives from YouTube and members of my office. The Manhattan District Attorney’s Office is committed to working with you to curb the rise in ghost guns and keep our children and communities safe.

Respectfully,



Alvin L. Bragg, Jr.

⁵ *Firearms Policy*, YouTube Help, <https://support.google.com/youtube/answer/7667605?hl=en>, Accessed February 28, 2024

⁶ *YouTube Leads Young Gamers to Videos of Guns, School Shootings*, (Tech Transparency Project, May 16, 2023), <https://www.techtransparencyproject.org/articles/youtube-leads-young-gamers-to-videos-of-guns-school>