

CONFIDENTIAL

Online Safety Enforcement

Email:

Onlinesafetyenforcement@ofcom.org.uk

6 January 2026

Dear Mr Byrne

Ofcom investigation into the provider of Sanctioned Suicide

We are writing to you as the legal representative of Personal Autonomy LLC, the provider of the regulated user-to-user service ‘Sanctioned Suicide’.

The purpose of this email is to provide your client with an update on our ongoing investigation into compliance with its duties under sections 10, 20 and 21 of the Online Safety Act 2023 (the ‘Act’) to protect users in the UK from illegal content, as well as its duties to carry out an illegal content risk assessment under section 9(2) of the Act, and to respond to requests for information issued under section 100 of the Act.

As you will be aware, we opened an investigation into the provider of Sanctioned Suicide’s compliance with the Act on 9 April 2025. Following Sanctioned Suicide’s decision to restrict users with UK IP addresses from accessing sanctioned-suicide.net and santionedsuicide.site on 1 July 2025, we entered a period of monitoring the sites to ensure that the service maintained these restrictions consistently and refrained from promoting or encouraging ways for UK users to avoid them.

On 6 and 7 November 2025, we notified your client that we had received evidence that the ‘Sanctioned Suicide’ service had been made available to individuals with UK IP addresses through an alternative ‘mirror site’ and advised your client of Ofcom’s intention to continue our investigation into the provider of Sanctioned Suicide’s compliance with the Act.

Further, as part of our investigation, we have noted comments from your blog dated 6 November 2025¹ discussing Sanctioned Suicide’s case, in which you stated that “*the only way to counter [Ofcom’s] strategy is to deny Ofcom a clean precedent*” and “*ensure that any “orders” [Ofcom] give to Americans are visibly and publicly refused*”.

Next steps in our investigation

While no formal decision has yet been reached, having reviewed the available evidence, we are now working towards issuing a provisional notice of contravention (‘Provisional Decision’) to your client in relation to breaches of the Act on which your client will have the opportunity to make representations, as required by the Act and as explained in our [Online Safety Enforcement Guidance](#). This will be issued in the first quarter of this calendar year.

¹ <https://prestonbyrne.com/2025/11/06/the-ofcom-files-part-2-ip-blocking-the-uk-is-not-enough-to-comply-with-the-online-safety-act/>

We will send a copy of this notice to your client's registered address and to you as their legal representative. We will publish an update on our [Enforcement Bulletin](#) page for the investigation, but the Provisional Decision itself will not be published.

Our Provisional Decision will also set out what steps we propose to take in light of our provisional findings of contravention. These may include imposing fines of up to £18m or 10% of qualifying worldwide revenue (whichever is greater).

In the most serious cases of non-compliance, where there is a continuing failure to comply with the Act and our enforcement action does not have the intended deterrent effect, and where appropriate given the risks of harm to individuals in the UK, we can seek a court order to require third parties to take action to disrupt the business of the provider ('business disruption measures'). This may require third parties to withdraw services from, or block access to, a regulated service in the UK.

Unless our concerns are fully addressed, Ofcom will consider using all of the powers available to us.

In particular, given that:

- (i) the service is capable of being used by individuals in the UK, and content on the service presents a risk of significant harm to users in the UK; and
- (ii) the provider of Sanctioned Suicide's consistent position in correspondence with Ofcom that it is a US-based service and not required to comply with the Act; and
- (iii) it appears clear from your blog above that you intend to advise your client not to take steps to comply with its obligations under the Act or with decisions that may be issued by Ofcom;

your client should note that, if appropriate and proportionate, we would be prepared to make an application to the court for business disruption measures swiftly after the period for making representations on the Provisional Decision has elapsed, if any non-compliance we may identify in our Provisional Decision continues.

For reasons of transparency, we are also publishing a short update on our [Enforcement Bulletin](#) page for the investigation. The wording of the update is set out in Annex 1.

In line with our standard processes, we will give your client notice in advance of issuing a Provisional Decision in this investigation.

Yours sincerely,

Ofcom's Enforcement Team

Annex 1

Ofcom has today [6 January 2026] informed the provider of this suicide forum that, having reviewed the available evidence, we are working towards issuing a provisional notice of contravention ('Provisional Decision') in relation to breaches of the Online Safety Act ('the Act'). This is part of the legal process we must follow as part of any investigation. While no formal decision has yet been reached, we are working to issue this in the first quarter of this year. The provider will then have an opportunity to make representations on our Provisional Decision, as required by the Act.

Unless our concerns are fully addressed, we will consider using all of the powers available to us. These include imposing fines of up to £18m or 10% of qualifying worldwide revenue (whichever is greater). In the most serious cases of non-compliance, where there is a continuing failure to comply with the Act, and where appropriate given the risks of harm to individuals in the UK, we can seek a court order to require third parties to take action to disrupt the business of the provider. This may require third parties to withdraw services from, or block access to, a regulated service in the UK.

As such, we have informed the provider of this forum that we would be prepared to make an application to the court for business disruption measures, where appropriate and proportionate, swiftly after the period for making representations on the Provisional Decision has elapsed, if any non-compliance we may identify in our Provisional Decision continues.

We will provide further updates on this investigation as soon as possible.