

18 U.S.C. § 2257

RECORDS REQUIREMENTS COMPLIANCE STATEMENT

Age Verification, Custodian of Records & Statutory Exemption Notice

CALLINGFANS PLATFORM

www.callingfans.com

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Operator Legal Entity:	ONLY4FITNESS LTD
Custodian of Records Address:	Dean Street, London W1D 1PT, England
Compliance Contact:	info@callingfans.com

This document constitutes the formal 18 U.S.C. § 2257 and 28 C.F.R. Part 75 compliance statement of CallingFans, prepared for review by payment processors, acquiring banks,

card networks, and legal/regulatory compliance departments.

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1. STATUTORY BACKGROUND AND SCOPE

This Compliance Statement is issued pursuant to 18 U.S.C. § 2257 — the **Child Protection and Obscenity Enforcement Act** — and the implementing regulations codified at **28 C.F.R. Part 75**, promulgated by the United States Department of Justice.

These statutory provisions impose record-keeping requirements on producers of visual depictions of actual or simulated sexually explicit conduct, requiring verification and maintenance of age records for all persons depicted. The regulations further require that a statement disclosing the location of such records be affixed to or appear within any covered material.

CallingFans ("**Platform**" or "**Operator**"), operated by **ONLY4FITNESS LTD**, issues this statement in full compliance with applicable federal law and in recognition of the requirements of its payment processing partners, including CCBill, and the card network compliance standards of Visa and Mastercard.

SCOPE: This statement applies to all visual depictions of actual or simulated sexually explicit conduct that appear on the Platform at www.callingfans.com. It covers both user-generated content uploaded by Creators and any content produced directly by the Platform Operator.

2. AGE VERIFICATION — AFFIRMATIVE COMPLIANCE STATEMENT

AFFIRMATIVE STATEMENT: CallingFans hereby affirms that any actual human being appearing in any visual depiction of actual sexually explicit conduct appearing or otherwise contained on the Website located at www.callingfans.com was at least eighteen (18) years of age at the time those visual depictions were produced.

This affirmation is supported by the following measures implemented and maintained by the Platform:

- **Mandatory Identity Verification** — All Creators are required to submit valid government-issued photographic identification prior to activating their account and before any content may be published. The submitted identification is reviewed to confirm the Creator's age and identity.
- **Minimum Age Threshold** — The Platform strictly prohibits access to, and use of, the Services by any person under the age of 18. By using the Services, all users represent and warrant that they are 18 years of age or older.
- **Document Retention** — Age verification documentation is maintained by the designated Custodian of Records in accordance with the requirements of 18 U.S.C. § 2257 and 28 C.F.R. Part 75.
- **Account Closure for Non-Compliance** — Any Creator account for which required identification is not submitted within the prescribed period is subject to immediate closure.

3. OPERATOR CLASSIFICATION — THIRD-PARTY CONTENT EXEMPTION

The Platform's Operator — **ONLY4FITNESS LTD** — is **not** the "producer" as defined under 18 U.S.C. § 2257 with respect to visual depictions of actual or simulated sexually explicit conduct that may appear on the Platform as a result of content uploaded by third-party users (Creators).

a. Basis for Exemption Under 18 U.S.C. § 2257(h)(2)(B)(v)

The Operator limits its handling of user-generated content exclusively to the following passive activities, as contemplated by the secondary producer exemption set forth at 18 U.S.C. § 2257(h)(2)(B)(v):

- Transmission of content
- Storage of content
- Retrieval of content
- Hosting of content
- Formatting of content

All such material appears on the Platform solely as the result of actions taken by third-party users. All portions of the Platform that contain user-generated material are under the direct control of the relevant Creator, for whom the Platform is provided as an online hosting and distribution service.

b. Section 230 Protection — 47 U.S.C. § 230(c)

In addition to the foregoing, the Operator is entitled to the protections afforded by Section 230 of the Communications Decency Act, codified at 47 U.S.C. § 230(c), as a provider of an interactive computer service. The Operator is not treated as the publisher or speaker of information provided by third-party users.

c. Content Moderation Authority

Pursuant to 18 U.S.C. § 2257(h)(2)(B)(v) and 47 U.S.C. § 230(c), the Platform's Operator reserves the right to delete, remove, or restrict access to any materials appearing on the Platform as a result of actions taken by users, which materials are determined — in the Operator's sole discretion — to be indecent, obscene, defamatory, or inconsistent with the Platform's policies and Terms of Service.

4. OPERATOR-PRODUCED CONTENT — EXEMPTION GROUNDS

To the extent that any images or videos appear on the Platform for which the Operator may be considered the "producer," such content is exempt from the record-keeping requirements of 18 U.S.C. § 2257 and 28 C.F.R. Part 75 for one or more of the following reasons:

Exemption	Statutory Basis	Description
I	18 U.S.C. § 2256(2)(A)	The produced content does not portray any sexually explicit conduct as defined under 18 U.S.C. § 2256(2)(A).
II	18 U.S.C. § 2257 28 C.F.R. Part 75	The produced content does not portray depictions of the genitals or pubic area created after July 27, 2006.
III	18 U.S.C. § 2257A	The produced content does not portray simulated sexually explicit activity occurring after the date of the recording.
IV	18 U.S.C. § 2257	The produced content was created before July 3, 1995.

a. Exemption Category I — No Depiction of Sexually Explicit Conduct

Images or videos produced by the Operator that do not portray any sexually explicit conduct as defined in 18 U.S.C. § 2256(2)(A) are exempt from the record-keeping requirements of 18 U.S.C. § 2257 and 28 C.F.R. Part 75.

b. Exemption Category II — Post-July 27, 2006 Genital Depiction

Images or videos produced by the Operator that do not portray depictions of the genitals or pubic area created after July 27, 2006, fall outside the scope of the record-keeping obligations imposed by the statute and its implementing regulations.

c. Exemption Category III — Simulated Activity Post-Effective Date

Images or videos produced by the Operator that do not portray simulated sexually explicit activity occurring after the effective date of 18 U.S.C. § 2257A are exempt from the requirements of that provision.

d. Exemption Category IV — Pre-July 3, 1995 Productions

Images or videos produced by the Operator that were created before July 3, 1995, predate the applicability of the record-keeping requirements and are therefore exempt.

5. DESIGNATED CUSTODIAN OF RECORDS

Without limiting the applicability of the exemptions stated above, and in accordance with the requirements of 18 U.S.C. § 2257 and 28 C.F.R. Part 75, the Operator has designated a Custodian of Records responsible for the maintenance of all records described therein in connection with materials appearing on the Platform that are not exempt from the record-keeping requirements.

a. Custodian Identity and Address

Designated Role:	Custodian of Records — 18 U.S.C. § 2257 / 28 C.F.R. Part 75
Legal Entity:	ONLY4FITNESS LTD
Street Address:	Dean Street
City / Country:	London W1D 1PT, England
Compliance Contact:	info@callingfans.com

b. Scope of Custodial Responsibility

The Custodian of Records is responsible for maintaining original records as required by 18 U.S.C. § 2257 and 28 C.F.R. Part 75 for all materials falling within the following categories:

- **Marketing and Advertising Materials** — Visual depictions of actual or simulated sexually explicit conduct contained in marketing or advertising materials that have been acquired or created by the Operator to promote the Platform.
- **Non-Exempt Operator-Produced Content** — Any materials produced by the Operator that are not exempt under the grounds set forth in Section 4 of this Statement.

6. RECORD-KEEPING OBLIGATIONS

In connection with its obligations under 18 U.S.C. § 2257 and 28 C.F.R. Part 75, CallingFans maintains the following records with respect to covered content:

- **Identity Records** — Copies of government-issued photographic identification for all Creators, confirming date of birth and identity.
- **Age Verification Records** — Documentation confirming that each depicted individual was 18 years of age or older at the time of production.
- **Record Accessibility** — Records are maintained at the address of the designated Custodian of Records and are available for inspection as required by applicable law.
- **Record Retention Period** — Records are retained for the period required by applicable federal law and regulation.

RECORDS INSPECTION: The records required by 18 U.S.C. § 2257 and 28 C.F.R. Part 75 are available for inspection at the address of the Custodian of Records identified in Section 5a of this Statement, during regular business hours, upon lawful request by authorized government officials.

7. PLATFORM ENFORCEMENT AND CREATOR OBLIGATIONS

CallingFans requires all Creators to comply with applicable law, including the age verification and record-keeping requirements of 18 U.S.C. § 2257 and 28 C.F.R. Part 75, with respect to any content they produce and publish on the Platform. The following obligations apply to all Creators:

- **Age Verification of Depicted Persons** — Creators are solely responsible for verifying the age of any persons depicted in content they produce and publish on the Platform. Creators must ensure that all depicted individuals are 18 years of age or older.
- **Record-Keeping** — Creators who qualify as "producers" under 18 U.S.C. § 2257 are responsible for maintaining the records required by that statute and its implementing regulations with respect to content they produce.
- **Submission of Identity Documentation** — All Creators are required to submit a valid government-issued photographic identification document to the Platform prior to publishing any content. Failure to do so within the prescribed period will result in account closure.
- **Prohibition on Unlawful Content** — Creators are strictly prohibited from uploading, publishing, or distributing any content that depicts any person under the age of 18 in any sexually explicit context. Violation of this prohibition will result in immediate account termination, removal of content, and reporting to relevant law enforcement authorities.
- **Truthful Representations** — By submitting identification and publishing content, Creators represent and warrant that all information provided is accurate, complete, and truthful, and that all depicted persons are 18 years of age or older.

ZERO TOLERANCE POLICY: CallingFans maintains an absolute zero-tolerance policy with respect to any content depicting minors in any sexually explicit or suggestive context. Any such content, if identified, will be immediately removed from the Platform. The matter will be reported to the National Center for Missing and Exploited Children (NCMEC) and to relevant law enforcement authorities. Responsible accounts will be permanently terminated.

8. CONTACT AND COMPLIANCE INQUIRIES

For any inquiries relating to this 18 U.S.C. § 2257 Compliance Statement, the Custodian of Records, or the Platform's age verification and record-keeping procedures, please contact us using the information below.

Compliance Inquiries	info@callingfans.com
Custodian of Records	ONLY4FITNESS LTD Dean Street, London W1D 1PT, England
Platform Website	www.callingfans.com
USC 2257 Statement URL	www.callingfans.com/p/USC2257
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