LANewGirl.com — Age Verification & Compliance Policy

Document Control

Field	Detail
Policy title	Age Verification & Content Compliance Policy
Policy number	LNG-COMP-001
Version	2.0
Effective date	October 23, 2026 (version 2.0); policy first adopted January 1, 2025
Operating entity	Magic Media USA LLC, doing business as LANewGirl.com (the "Company")
Policy owner	Scott Emery, Managing Director and Compliance Officer
Approved by	Scott Emery, Managing Director
Review cycle	At least every 12 months, and within 30 days of any material change in card-network rules or applicable law
Next scheduled review	October 23, 2027
Distribution	All employees, contractors, moderators, content providers; acquiring bank and payment service providers on request

Scope. This Policy applies to every page, product, subscription, download and payment flow operated under the LANewGirl.com domain and any affiliated domain, application or white-label property that processes payments through the Company's merchant account(s). It governs (a) verification of the age of every user before access to adult material, (b) verification of the age, identity and consent of every person depicted in, or uploading, content, and (c) the review, complaint, takedown and reporting controls that support both.

Revision History

Version	Date	Author	Summary of changes
1.0	January 1, 2025	Scott Emery	Original age verification policy adopted
2.0	October 23, 2026	Scott Emery	Policy update: card-network and state-law mapping, Didit verification, performer consent and 2257 records, takedown process, California geo-block, governance and audit

1. Purpose and Policy Statement

No person under 18 years of age may access adult material on LANewGirl.com, and no person under 18 years of age may appear in, or upload, any content on the platform. This rule has no exceptions and applies regardless of any jurisdiction's lower age of majority. Where a jurisdiction sets a higher age of majority (for example 19 or 21), the higher age applies to users and content providers in that jurisdiction.

The Company maintains this Policy to:

1. Prevent minors from accessing sexually explicit material.
2. Ensure every person depicted in content is a verified adult who has given documented consent to be recorded and to the public distribution of that content.
3. Meet the standards of the card networks, including the Mastercard Specialty Merchant Registration requirements for adult content merchants (AN 5196) and the Visa Integrity Risk Program (VIRP), and the requirements of the Company's acquiring bank and payment service providers.
4. Comply with all applicable federal, state and international law, including 18 U.S.C. § 2257 and 28 C.F.R. Part 75 recordkeeping requirements and state age-verification statutes.

The Company operates a **zero-tolerance** standard toward child sexual abuse material (CSAM), non-consensual content, and any content or marketing that depicts, suggests or implies the involvement of a minor. Any breach results in immediate removal, account termination, preservation of evidence and reporting to the National Center for Missing & Exploited Children (NCMEC) and law enforcement as described in Section 7.

Note on the site name. "New girl" refers exclusively to adult performers who are new to LANewGirl.com or to the industry. The Company does not use, permit or market any title, tag, search term, thumbnail or description that suggests a performer is under 18, including terms such as "teen" used in combination with youth-implying language, school settings, or childlike props or styling (see Section 6).

2. Definitions

Term	Meaning in this Policy
Adult Material	Any sexually explicit, nude or erotic image, video, audio, text or other content offered on LANewGirl.com.
Age Gate	The interstitial screen shown to every visitor before any Adult Material, thumbnail or explicit preview is displayed.
Age Verification (AV)	A process that establishes, to the standard required by this Policy and applicable law, that a person is at least 18 (or the higher local age of majority). Self-declaration alone is not Age Verification.
AV Provider	The independent third-party verification vendor engaged under Section 4.3: Didit.
Content Provider	Any performer, studio, producer or other party who supplies or uploads content to LANewGirl.com.
Depicted Person	Every individual who appears, in whole or in part, in any content on LANewGirl.com.
Verified User	A user who has successfully completed Age Verification and holds a valid, unexpired verification status.
Prohibited Content	Content described in Section 6.2, including CSAM, non-consensual content and content suggesting minors.
Records Custodian	The person designated under 28 C.F.R. § 75.4 to maintain records required by 18 U.S.C. § 2257.

Term	Meaning in this Policy
Compliance Officer	The individual named in Document Control with overall responsibility for this Policy.
Acquirer	The acquiring bank and any payment service provider or payment facilitator through which the Company accepts card payments.

3. Regulatory and Card-Network Framework

LANewGirl.com designs its controls to satisfy the strictest applicable requirement in each area. The table below maps each requirement to the section of this Policy that implements it.

Source	Key requirement	Implemented in
Mastercard Rules, Ch. 9 Specialty Merchant Registration; AN 5196 (adult content merchants)	Documented age and identity verification for all Depicted Persons and uploaders; documented consent to be depicted and to public distribution; pre-publication content review; complaint process resolved within 7 business days; appeals for Depicted Persons; no marketing that suggests illegal content	Sections 5, 6, 7
Visa Integrity Risk Program (VIRP) and Visa Core Rules	Merchant controls preventing illegal or brand-damaging content; acquirer monitoring and reporting; mandatory consumer and creator age verification	Sections 4, 5, 6, 9
18 U.S.C. § 2257 / § 2257A; 28 C.F.R. Part 75	Age and identity records for every performer; legible ID copies; cross-referenced records; Records Custodian and compliance statement	Sections 5, 8

Source	Key requirement	Implemented in
18 U.S.C. § 2258A	Reporting of apparent CSAM to the NCMEC CyberTipline	Section 7
U.S. state age-verification statutes (currently enacted in a majority of states, upheld by the U.S. Supreme Court in *Free Speech Coalition v. Paxton*, 2025)	"Reasonable" or "commercially reasonable" age verification before access, commonly by government ID, digital ID, transactional data or a third-party AV service; some states require an anonymized option; restrictions on retaining identifying data	Section 4
UK Online Safety Act 2023 (Ofcom Part 5 guidance)	"Highly effective" age assurance for UK users	Section 4.5
EU / EEA law (GDPR; Digital Services Act) and other national laws	Lawful processing and minimization of verification data; local age-assurance rules	Sections 4.5, 8
California and other U.S. privacy laws (e.g. CCPA/CPRA)	Notice, minimization and deletion rights for personal data	Section 8

Jurisdiction register. Because state and national age-verification laws change frequently, the Compliance Officer maintains a Jurisdiction Register listing each jurisdiction with an AV law in force, its effective date, the methods it accepts, and any data-retention limits. The register is reviewed monthly against the Age Verification Providers Association (AVPA) and Free Speech Coalition trackers and legal counsel's advice. Any jurisdiction the Company cannot serve compliantly is geo-blocked (Section 4.5).

Jurisdiction-Specific Requirements

LANewGirl.com verifies the age of every visitor in every jurisdiction it serves. The jurisdictions below have national or state regimes with specific technical requirements.

Jurisdiction	Law and regulator	How LANewGirl.com meets it
United States	State age-verification statutes, enforced by state attorneys general and private lawsuits	Every visitor is age-verified through Didit regardless of state, which meets or exceeds each state's requirement. California is geo-blocked.
United Kingdom	Online Safety Act 2023, Part 5; Ofcom	Didit facial age estimation with liveness detection, with ID scan and face match as fallback: methods Ofcom recognises as highly effective age assurance.
France	SREN Law (2024); Arcom age-verification standard, in force since January 2025	Users in France are offered Didit's double-anonymity verification option, under which the provider does not know which site requested the check and LANewGirl.com never receives the user's verification data. It combines facial age estimation with ID verification.
Other EU / EEA	GDPR; Digital Services Act; national laws	Universal verification through Didit; verification data minimized and deleted as set out in Section 8.

4. User (Viewer) Age Verification

Every LANewGirl.com user must complete Age Verification through an independent third-party AV Provider before any Adult Material, explicit thumbnail or explicit preview is displayed. Clicking "I am 18" is never sufficient on its own.

4.1 Age Gate

1. The Age Gate loads before any Adult Material on every entry point, including the homepage, direct content URLs, search-engine landing pages, affiliate links and embedded players.
2. Pages behind the Age Gate are served with `noindex` and are excluded from public previews; explicit content is not loaded in the page source until verification succeeds.

3. The Age Gate displays the RTA ("Restricted To Adults") meta label and links to this Policy, the Terms of Service and the Privacy Policy.
4. Pre-verification pages show only non-explicit, non-suggestive material.

4.2 Accepted Verification Methods

The AV Provider offers the following methods to LANewGirl.com users. The methods available to a user are limited to those accepted by the user's jurisdiction (Section 4.5).

Method	How it works	Notes
Facial age estimation (primary)	Didit estimates the user's age from a live selfie, with liveness detection to block photos, videos and masks	Default LANewGirl.com method. Pass threshold set at an estimated age of 25 to buffer estimation error. No identity document is collected from users who pass.
Government ID scan + face match (fallback)	The user scans a government-issued photo ID; Didit checks the document's authenticity and date of birth and matches it to the live selfie	Shown automatically to any user whose estimate falls below the threshold. Access is denied unless the ID check is passed.

A successful card payment alone is **not** treated as Age Verification, because debit and prepaid cards can be held by minors.

4.3 AV Provider Requirements

LANewGirl.com engages Didit as its AV Provider under a written agreement that requires the provider to:

- Be independent of the Company and organized under the laws of a U.S. state or hold equivalent certification (e.g. PAS 1296 / ISO/IEC 27566 age-assurance certification, or AVPA membership).
- Return only an over/under-age result and a verification token to the Company, not ID images, unless law or this Policy requires otherwise.
- Delete ID images and biometric data immediately after verification, except where a law requires retention.

- Maintain SOC 2 Type II or ISO/IEC 27001 security controls and provide audit evidence annually.

4.4 Verification Status, Re-verification and Failures

1. A successful verification is bound to the user's LANewGirl.com account. Logged-out sessions must re-verify, or present a valid reusable token.
2. LANewGirl.com requires re-verification at least every 12 months, on login from a new device or country, and whenever fraud signals appear (shared credentials, chargebacks citing minors, unusual account use).
3. A failed verification blocks access. A user may retry up to 3 times in 24 hours before the account is locked for manual review.
4. Any credible indication that a user is a minor (self-disclosure, parent report, support message) triggers immediate account suspension, refund of any active subscription and closure of the account.

4.5 Jurisdictional Controls

1. The Company determines user location by IP geolocation, with VPN and proxy detection.
2. Users in a jurisdiction with an AV law are shown only the methods that law accepts.
3. Users connecting through detected VPNs or anonymizing proxies must complete full ID verification.
4. Jurisdictions LANewGirl.com has chosen not to serve, or cannot serve compliantly, are geo-blocked with a notice page and receive no content. The current list is maintained in the Jurisdiction Register and is: California, United States.
5. UK users must pass a method Ofcom recognises as highly effective (photo ID matching, facial age estimation, digital ID, or equivalent).
6. Users in France are offered Didit's double-anonymity verification option, as Arcom's standard requires.

4.6 Additional Safeguards

- Billing descriptors are discreet and clearly identify the merchant to prevent confusion-based disputes: MAGIC MEDIA USA LLC.
- LANewGirl.com supports parental-control filtering by publishing the RTA label and blocking indexing of explicit pages.

- Customer support staff are trained to escalate any suspicion of a minor user to the Compliance Officer the same business day.

5. Content Provider and Performer Verification and Consent

No content is published on LANewGirl.com until every Depicted Person and the uploading Content Provider have been age-verified, identity-verified and have signed documented consent. Responsibility rests with the Company, not the Content Provider alone.

5.1 Content Provider Onboarding

1. Only verified Content Providers may upload. Each completes identity verification through the AV Provider (government photo ID + liveness selfie + document authenticity check) before upload rights are enabled.
2. Studios and producers additionally provide business registration, a named Records Custodian and their own 2257 compliance statement.
3. Each Content Provider signs the LANewGirl.com Content Provider Agreement, which includes warranties that all Depicted Persons are 18+, consented, and are covered by records the Company may inspect on request.
4. Payouts are made only to the verified individual or verified business, never to a third party.

5.2 Verification of Every Depicted Person

For each Depicted Person in each piece of content, LANewGirl.com obtains and retains before publication:

- A legible copy of a current, government-issued photo ID showing legal name and date of birth.
- A second form of verification: a liveness-matched selfie through the AV Provider, or a second ID.
- A dated photograph of the Depicted Person holding their ID, taken on the production date.
- All names, stage names, aliases and maiden names used (28 C.F.R. § 75.2).
- The production date(s) of the content.

The Depicted Person must be at least 18 on every production date. Content in which any Depicted Person cannot be verified is rejected.

5.3 Documented Consent

Each Depicted Person signs a written LANewGirl.com release, separate from any general model release, that expressly records:

1. Consent to be recorded and depicted in the specific content.
2. Consent to the public distribution of the content and to its upload to LANewGirl.com.
3. Consent to the content being downloaded by users, where downloads are offered.
4. Acknowledgment of the right to request removal under Section 7.3.

Consent forms are signed electronically through the verification platform or in wet ink, dated, and linked to the content ID.

5.4 No Livestreaming

LANewGirl.com does not offer livestreaming, webcam or any other real-time content. Livestreaming will not be introduced until this Policy has been amended to add real-time verification and monitoring controls and the amendment has been provided to the Acquirer.

5.5 2257 Compliance Statement

Every LANewGirl.com page displaying content carries a link to the Company's 18 U.S.C. § 2257 compliance statement, identifying the Records Custodian and the address where records are kept.

6. Content Review, Moderation and Prohibited Content

Every item of content submitted to LANewGirl.com is reviewed by a trained human moderator before publication; nothing goes live on upload.

6.1 Pre-Publication Review

1. Identity match first: the uploader and every Depicted Person must already hold a Didit-verified identity and signed consent on file, or the content does not enter review.
2. A human moderator then reviews the full content, title, description, tags and thumbnail, and confirms each Depicted Person matches their verification records.
3. Any doubt about a Depicted Person's age (appearance, styling, context) causes rejection unless the Compliance Officer confirms the records and approves in writing.
4. Reviews are logged with moderator ID, timestamp and decision.

6.2 Prohibited Content

LANewGirl.com prohibits the following and removes it immediately:

- Any content involving, or appearing to involve, a person under 18.
- Content suggesting minors through titles, tags, search terms, school uniforms, childlike props, "barely legal" framing or similar.
- Non-consensual content, including hidden-camera, "revenge", coerced or intoxicated-incapacity content, and content depicting non-consent, even if simulated.
- Incest, bestiality, extreme violence, and any content illegal in the jurisdiction of the Company or the user.
- Deepfakes or synthetic content depicting a real person without their documented consent.
- Any content that violates the Mastercard BRAM or Visa VIRP standards.

6.3 Marketing and Search Controls

Titles, tags, descriptions, ad creatives, affiliate materials and search terms must not give the impression that content involves minors or non-consent. LANewGirl.com maintains a blocked-terms list that prevents such searches and tags, and reviews affiliate marketing quarterly.

7. Complaints, Takedowns and Law Enforcement Reporting

Anyone, whether or not they hold a LANewGirl.com account, can report content, and every report is resolved within 7 business days; suspected CSAM is removed immediately.

7.1 Reporting Channels

- A "Content Removal" link in the footer of every LANewGirl.com page, leading to the public takedown form at www.lanewgirl.com/content-removal. The form requires no login and accepts any report: suspected minors, non-consensual content, other illegal content, copyright claims, and removal requests from Depicted Persons.
- Email to legal@lanewgirl.com, monitored every business day.

7.2 Response Timelines

Report type	Action	Deadline
Suspected CSAM or minor	Content disabled on LANewGirl.com, evidence preserved, NCMEC CyberTipline report filed	Disabled immediately; NCMEC report as soon as reasonably possible and within 24 hours
Non-consensual content or request by a Depicted Person	Content disabled on LANewGirl.com pending review	Disabled within 24 hours; final decision within 7 business days
Other illegal or policy-violating content	Reviewed and removed from LANewGirl.com if confirmed	Within 7 business days
Copyright (DMCA) notice	Handled under the DMCA procedure	Expeditiously

7.3 Appeals and Removal Requests by Depicted Persons

Any Depicted Person may request removal of LANewGirl.com content in which they appear, including on the ground that they withdraw consent or never gave it. Requests are reviewed by someone other than the original moderator. Where consent is disputed, the content stays offline until the dispute is resolved in the Depicted Person's favor or the Company holds valid, unrevoked consent records.

7.4 Law Enforcement

LANewGirl.com complies with 18 U.S.C. § 2258A, preserves reported content and associated account data for at least 1 year after a CyberTipline report, terminates the associated accounts, and cooperates with valid law-enforcement requests. Suspected content is never forwarded internally by email or chat; it is accessed only in the moderation system by authorized staff.

7.5 Reporting to the Acquirer

LANewGirl.com provides its Acquirer with a monthly report of content flagged, content removed, reasons, and resolution times, and notifies the Acquirer within 5 business days of any NCMEC report or law-enforcement contact relating to LANewGirl.com.

8. Recordkeeping, Data Protection and Retention

LANewGirl.com keeps performer records for as long as federal law requires and keeps viewer identity data for as little time as possible.

Record	Where held	Retention
Performer 2257 records (IDs, names, aliases, production dates, cross-references)	Encrypted records system, under the Records Custodian	Per 28 C.F.R. § 75.4: at least 7 years from creation or last amendment; 5 years after the business ceases
Performer consent forms	Encrypted records system, linked to content ID	Life of the content + 7 years
Viewer ID images and biometrics	AV Provider only	Deleted immediately after verification unless law requires otherwise
Viewer verification result (pass/fail, method, timestamp, token)	Company database	Life of the account + 2 years
Moderation logs and decisions	Moderation system	3 years
Complaint and takedown records	Compliance case system	5 years
NCMEC reports and preserved material	Restricted, access-logged storage	As required by law and law enforcement

Security. LANewGirl.com records are encrypted at rest (AES-256) and in transit (TLS 1.2+). Access follows least-privilege rules, requires multi-factor authentication, and is logged. Access logs are reviewed quarterly.

Privacy. Verification data is used only for age and identity verification and legal compliance. It is never sold, used for marketing, or disclosed except to the AV Provider, regulators, law enforcement or the Acquirer as required. The Privacy Policy explains users' rights under applicable law (including CCPA/CPRA and GDPR).

9. Governance, Training, Audit and Enforcement

The Compliance Officer owns this Policy for LANewGirl.com and reports on it to Company management at least quarterly.

9.1 Roles

Role	Responsibility
Compliance Officer — Scott Emery	Owns the Policy, Jurisdiction Register and Acquirer reporting; approves exceptions; leads incident response
Records Custodian — Scott Emery	Maintains 2257 records and makes them available for inspection
Moderation Lead — Scott Emery	Runs pre-publication review for LANewGirl.com; trains moderators
Technical Lead — Scott Emery	Operates the Age Gate, the Didit integration, and geolocation and geo-blocking

9.2 Training

All LANewGirl.com moderators and support staff complete training on this Policy, CSAM recognition, trauma-informed handling and escalation before starting work and at least annually. Completion is recorded.

9.3 Testing and Audit

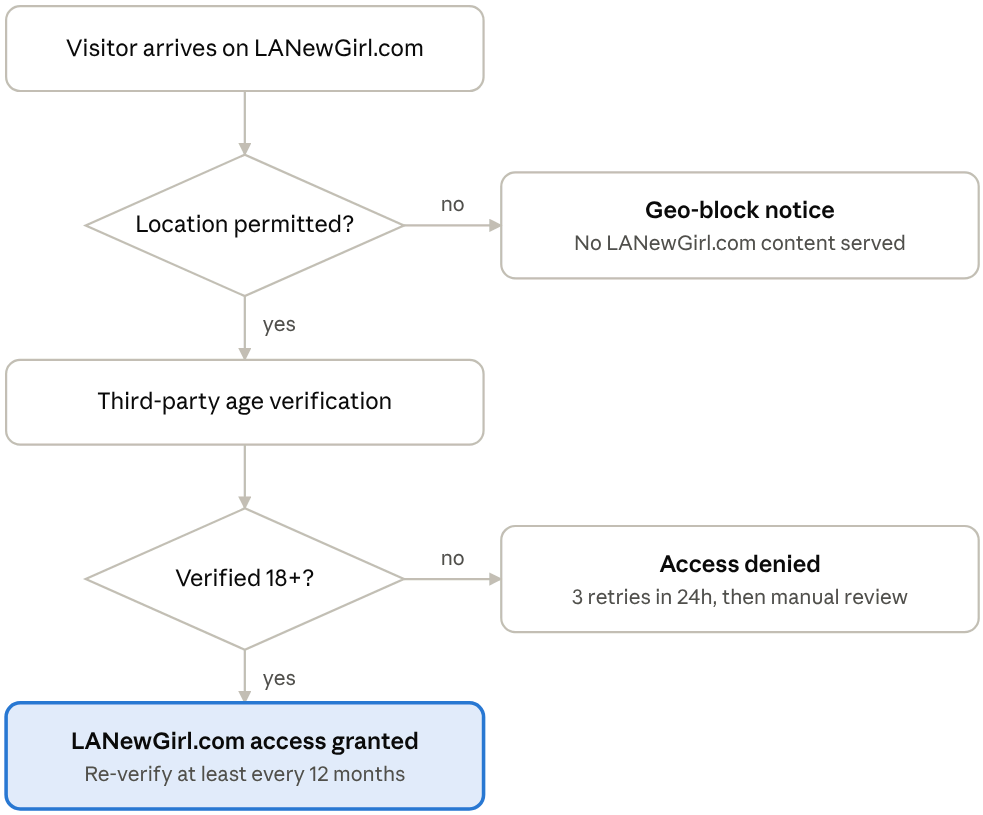
1. Monthly: test purchases and access attempts from AV-law jurisdictions to confirm the LANewGirl.com Age Gate and AV flow cannot be bypassed.
2. Quarterly: sample audit of at least 5% of newly published content against verification and consent records.
3. Annually: internal review of this Policy and its controls by the Compliance Officer, documented in writing and shared with the Acquirer on request.
4. AV Provider performance (pass rates, error rates, outages) reviewed quarterly.

9.4 Enforcement

Violation of this Policy by a Content Provider results in content removal and account termination, and may result in forfeiture of unpaid earnings and referral to law enforcement. Violation by staff or contractors results in disciplinary action up to termination. If the AV system fails, access to Adult Material is suspended until it is restored; LANewGirl.com fails closed, never open.

Appendix A — Viewer Verification Flow

LANewGirl.com shows adult content only after a verified 18+ result



viewer age verification flow · 2 checks

A visitor sees no adult content until the location check and third-party age verification both pass; any failure stops access.

Appendix B — Compliance Contacts

Purpose	Contact
Compliance Officer	Scott Emery, legal@lanewgirl.com
Content reports and removal requests	www.lanewgirl.com/content-removal or legal@lanewgirl.com
18 U.S.C. § 2257 Records Custodian	Scott Emery, Magic Media USA LLC
Law enforcement requests	legal@lanewgirl.com
AV Provider	Didit (didit.me)

Appendix C — Officer Attestation

I certify that, to the best of my knowledge, this Policy accurately describes the controls in place and operating on LANewGirl.com as of the date below, and that the Company will notify its Acquirer of any material change.

Name	Scott Emery
Title	Managing Director, Magic Media USA LLC
Signature	*Scott Emery* Date: October 23, 2026

Sources

- Mastercard Rules Ch. 9 / AN 5196 summary — Adult Biz Law
- Mastercard adult content requirements — Segpay
- Card brand requirements: Mastercard AN 5196 and Visa VIRP — VerifyMy
- US state age verification laws — AVPA
- Age verification FAQ — Free Speech Coalition