

Attorney Review of Site and Materials

Scope of Work:

1. Do you recommend I move my website, currently hosted by GoDaddy and SquareSpace, out of the U.S.? **Yes. Move site to Switzerland, Holland or Germany - where sex work is legal.** What about email? **Yes, use protonmail.ch.** I currently use Gmail for client email and everyday correspondence, and Mailchimp for outbound email newsletters. Lastly, what about a .com in general which is governed by ICANN? Do you recommend I move off it to something else; are there any domains that don't fall under US jurisdiction? **Could use a .ch rather than .com to avoid US and ICANN.**

2. Do I need to stop offering touch? **No, but should be solely for educational purposes.** If not, how should I be wording this offering? As a precaution, I have already removed reference to touch from most of my website.

3. In addition to the in-person coaching, I also offer online coaching via Skype and Zoom. In both the in-person and online sessions, I remain clothed. However my clients may not. Anything I need to be aware of regarding the legality of this? **Need to verify age and location. Ensure private setting for both client and provider. Otherwise ok unless scene playing with things like blood, rape, scat, etc.** Along these lines, does it matter where I am located or where the client is located? Could I be working in Canada with clients in the US? Or vice versa? Or working in the US with a client in the UK? **Suggests non-US server hosting.**

4. Do you have any specific recommendations on how to protect myself and this work from being seen and prosecuted as general sex work? **You are unlikely to face this issue.**

5. This service disclaimer is at the bottom of my website's [coaching page](#) Should it be added to the intake/waiver I have clients sign? **Yes.**

Service disclaimer: Massage therapy is a professional occupation regulated by state licensure (OMB). I do not provide massage, nor any preventative, restorative, or therapeutic treatments of any kind. If you have an injury or medical concern, please consult your doctor or seek out a licensed massage therapist.

6. To your knowledge, has anyone besides Craig's List been prosecuted under this new federal law? I'm under the impression that BackPage closed as a response to this but voluntarily. **All shut downs have been voluntary to far. No prosecutions. Electronic Frontier Foundation is filing a lawsuit. This will be in litigation for awhile.**

Additional comments given in person:

- Ensure all forms state LLC to protect personal assets. All income should come into LLC. Keep a log / receipt book. Any ads or marketing materials should have LLC as part of name.
- The police are not going after me, or anyone like me. I'm too hippy, too white and too old.
- The church folks tend to go after women under the age of 35.
- More likely to have a disgruntled partner than the vice coming after me. Try to avoid problem clients. Screen for unhappy marriages or partnerships and vindictive partners.
- I'm 98% fine the way everything is now. If want extra protection, move site and email overseas.
- Prostitution is legal in NV. Nowhere else in the US. What Fosta changed is the jurisdiction. Might be worth banding together as an association and setting up a non-profit institute there. Sex bods could be independent contractors of the non-profit. This would provide the most protection in the US. He's happy to work with us on this if there's interest.
- Cam work is legal. Nothing to worry about there as long as not scene playing with things like blood, rape, scat.
- There's an exception to laws about touch for education. This is true in OR and in most states. Website and all docs should state that touch is for education only. Expressly stating this will provide legal protection.
- Intake / waiver form should verify age. Clients need to be over the age of consent in the jurisdiction they're in. 18-19 years old in Canada. To eliminate any problems, just say 21 or older.
- Send a close-out / termination email or letter to anyone you are ending a client relationship with.
- Suggests having a "burner" phone. Cheap, separate phone for work only.
- For Canadians, advertising is the trickiest part. There's a human rights charter and laws are different in different provinces. See a Canadian solicitor - John can refer if need be.