

Ever Accountable Policy: Handling and Reporting Child Sexual Abuse Material (CSAM)

Effective Date: [Insert Date]

Applies To: All Ever Accountable LLC employees, contractors, independent contractors, temporary workers, support representatives, and any other personnel who may encounter user content or reports in the course of their duties

1. Purpose

This policy establishes Ever Accountable LLC's mandatory procedures for responding to any report or discovery of possible *Child Sexual Abuse Material (CSAM)*, including AI-generated or synthetic depictions of minors, in compliance with 18 U.S.C. §2258A, 18 U.S.C. §2252A, and other similarly applicable federal and state laws. This policy is essential to fulfilling our legal obligations as an electronic communication service provider and our company's mission to protect individuals and families.

2. Policy Overview

Ever Accountable LLC **does not routinely review customer reports** except when: (a) our paid accountability coaches provide services; (b) customer support agents respond to inquiries from accountability partners to verify concerning content; or (c) we are required to do so by law or legal process. This limited review practice does not diminish our obligation to report CSAM when we obtain actual knowledge of apparent violations.

All reports are automatically deleted after **21 days**, except where: (a) further preservation is required by law, including 18 U.S.C. §2258A(f); (b) preservation is required by legal process including subpoenas, court orders, search warrants, or law enforcement requests; or (c) the report relates to suspected CSAM and the 90-day preservation period under 18 U.S.C. §2258A(h) has not expired, or any extension thereof requested by NCMEC or law enforcement. However, if any employee obtains actual knowledge of any facts or circumstances from which there is an apparent violation of 18 U.S.C. §§2251, 2251A, 2252, 2252A, 2252B, or 2260 (relating to CSAM or AI-generated sexual content involving minors) through the provision of services or in the normal course of business operations, Ever Accountable must report it to the

National Center for Missing & Exploited Children (NCMEC) as soon as reasonably possible, and in no event later than the time periods required by 18 U.S.C. §2258A.

Ever Accountable LLC reserves the right to alert appropriate law enforcement agencies regarding unlawful or suspected criminal activity, and to preserve, copy, and share content and related information with law enforcement in response to their request or as required or permitted by law. Such disclosures are made pursuant to 18 U.S.C. §2702(b) and (c), which permit voluntary disclosure to law enforcement and disclosure in response to legal process, and 18 U.S.C. §2258A(f), which authorizes preservation of evidence. Ever Accountable LLC may also disclose information to law enforcement as permitted under any relevant federal or state law where a duty to report crimes against children is implicated.

3. Definition of CSAM

For purposes of this policy, CSAM (Child Sexual Abuse Material) includes any visual depiction, including any photograph, film, video, picture, digital image, or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where: (a) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; (b) such visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaging in sexually explicit conduct; or (c) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. "Minor" means any person under the age of 18 years. "Sexually explicit conduct" has the meaning set forth in 18 U.S.C. §2256(2). This includes AI-generated, synthetic, or "deepfake" depictions.

4. Reporting Procedure

If any employee receives or observes content, screenshots, or descriptions that may be CSAM:

1. **Do not further view, copy, download, distribute, or share** the material except: (a) as necessary to make a report to the designated Trust & Safety Lead; (b) as necessary to comply with reporting obligations to NCMEC; (c) as required to preserve evidence under 18 U.S.C. §2258A(f); or (d) as required by law enforcement or legal process. Employees must minimize exposure to the material while fulfilling legal obligations. Unauthorized viewing, copying, downloading, or distribution of CSAM may constitute a federal crime under 18 U.S.C. §2252A and any applicable state law.
2. **Immediately notify** the designated Compliance or Trust & Safety Lead [Attn. Julia, email: reports@everaccountable.com]. If the designated lead is unavailable, notify [Attn. Zakson, email: reports@everaccountable.com]. If neither is available, contact [Attn.

Marianne, email: reports@everaccountable.com EXECUTIVE CONTACT]. All notifications must be made within 2 hours of obtaining actual knowledge.

3. The designated lead will:

- Securely document the information required by 18 U.S.C. §2258A(b), including: (1) identifying information about the user; (2) the date and time of the apparent violation; (3) the geographic location information available; (4) images or other data relating to the apparent violation; and (5) a complete copy of any related communication.
- Submit a report to NCMEC's CyberTipline (<https://report.cybertip.org/>) in accordance with 18 U.S.C. §2258A, including all required elements specified in that statute.
- Preserve NCMEC's confirmation of the report and maintain records of the report for the period required by 18 U.S.C. §2258A(h), which is currently 90 days from the date of submission, unless extended by NCMEC or law enforcement request.

4. Do **not** contact the user or accountability partner about the content or the fact that a report has been made, as prohibited by 18 U.S.C. § 2258A(e), except as may be required by law or legal process.

5. AI-Generated or Synthetic Material

If the content **appears to depict minors** in sexual acts—even if clearly AI-generated—it must be treated as suspected CSAM and reported following the same procedure.

6. Data Retention

- Regular user reports continue to auto-delete after 21 days.
- NCMEC confirmations and related documentation are retained for at least ninety (90) days as required by 18 U.S.C. § 2258A(h), or longer if requested by NCMEC or law enforcement, or as required by applicable record retention policies.

- No CSAM imagery is stored by Ever Accountable except as may be necessary to comply with preservation obligations under 18 U.S.C. § 2258A(f) or as required by law enforcement or legal process.
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7. Training and Awareness

All employees who handle customer support or content escalation will receive periodic training on:

- Recognizing potential CSAM or AI-generated depictions of minors.
 - Proper escalation and reporting steps.
 - Privacy and data handling during incident response.
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8. Confidentiality and Compliance

All information regarding CSAM reports is confidential and handled only by authorized personnel, subject to disclosure requirements under applicable law, including 18 U.S.C. 2258A and § 2702 and any applicable state law, and except as may be required in response to valid legal process or governmental investigations. Failure to follow this policy may result in disciplinary action up to and including termination, and may expose non-compliant individuals to criminal liability under 18 U.S.C. §2258A(f) for failure to report or under 18 U.S.C. §2252A for knowing possession or distribution of CSAM. Nothing in this policy shall be construed as providing legal advice, and individuals should consult with their own legal counsel regarding potential criminal liability.

This policy has been approved and adopted by Ever Accountable LLC.

Approved by: _____

Printed Name and Title: _____

Date: _____

Acknowledged and agreed by Employee/Contractor:

Printed Name and Title: _____

Date: _____