A) Hypothetically assuming one wished to offer a service to create and/or host individual (not a directory) websites for escorts (and assuming that those sites might be deemed to be an offer of prostitution).

1) Is there any distinction between designing or hosting

2) Would a statement by the person commissioning the design or the hosting to certify that the content complies with all applicable US laws be any kind of protection

3) How should communication be conducted with the provider (would [protonmail.](http://protonmail.ch)com be adequate protection)

4) Where and how should the payment for the design/hosting be made

5) Can we assume that the 'safest' option is to find a host for both the design development and the ultimate hosting on a server owned by a company registered outside the US, where the server is also outside the US, and where the owning company has no US subsidiaries/affiliates/etc

6) Are there any preferred countries (for example where prostitution is either legal or not specifically criminalised). Austria, Netherlands, Spain, Germany come to mind and Switzerland (but beware that by law the owner of the website being hosted must be registered and cannot be hidden). Though for speed of connection Panama may also be an option.

7) The hosting could be conducted as sub-accounts under one main account (in which case a legal attack on one is an attack on all), or with each separate hosting instance being set up separately in a distinct account. Are there benefits to either one or the other.

8) It's doubtful the provider would be willing to set up their own hosting account (though this might not be illegal under Fosta). So how could a third party (assume a non-citizen of the US) be protected if at all. What risks of prosecution might that person face.

9) How do you advertise these services without being seen to facilitate prostitution by accepting an order form or contact from a bulk email.

B) Tips for individual listings

1) What is the real risk for individuals as opposed to blogs, boards, vetting services, directories. 2) Does a carefully worded individual site with no outbound links actually breach Fosta? Is an individual site 'facilitating prostitution'. By having a website (with no external links of references), are you ‘facilitating prostitution’ of ***yourself*** and so liable under the law.

3) Is it worth even trying to amend words and suggestions on an individual site? Does the very act of making the changes suggest you know you need to avoid illegality and therefore damn yourself with your own actions.

4) Weasel words popup. The two common elements are warnings on erotic content and on payment for time only. Do the words offer any protection? Are they a marker of an escort site? How could you amend the payment for time only warning?

5) Do links on the welcome page to Slixa, Preferred411, etc breach Fosta as they link to directory sites.

6) Should a rates page be removed, or changed.

7) What other areas should be avoided (touring; doubles; links to friends; verification rules; obvious FAQs; a secure email address)

8) Should any sections of the site (or indeed the entire site) be subject to sign up by a visitor. Here is an example of the latter:<http://anabelle-rose.com/>