

FEDERAL BUREAU OF INVESTIGATION

**REGULATORY INSPECTION REPORT
(18 USC 2257)**

OF

**Private
(Pure Play Media, Inc.)
19800 Nordhoff Place
Chatsworth, CA 91311**

Date of Inspection: 11/16/2006

REGULATORY INSPECTIONS REPORT

SUBJECT TO PROTECTIVE ORDER

FBI_000830

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REGULATORY INSPECTIONS REPORT

Report of: SSA Charles R. Joyner,
2257 Regulatory Inspections Program, Crimes Against Children Unit,
Violent Crimes Section, Criminal Investigative Division

Report Date: November 17, 2006

File Number: [REDACTED] (F) Private

PRODUCER INFORMATION

An inspection was conducted of Private (Pure Play Media, Inc.) pursuant to 18 USC 2257 and 28 Code of Federal Regulations Part 75. The inspection was conducted at Pure Play Media, Inc. on November 16, 2006, at 19800 Nordhoff Place, Chatsworth, CA 91311. [REDACTED] identified herself as the Compliance Supervisor for Pure Play and provided the 2257 information. The Custodian of Records was listed as [REDACTED] at the 19800 Nordhoff Place address, but [REDACTED] advised [REDACTED] is no longer employed at Pure Play and now [REDACTED] serves in that capacity. [REDACTED] Vice President of Sales and Marketing, telephone number (818)717-5355, fax number (818)998-6952, was also present during the inspection. [REDACTED] advised the owner of Pure Play is [REDACTED]. [REDACTED] advised Private is a separate company than Pure Play, but Pure Play serves as the Custodian of Records.

INSPECTION SUMMARY

DVDs produced by Private were ordered from the internet. Contract inspectors reviewed seventeen DVDs and identified all performers by stage name or by still photographs taken from the video. All videos reviewed contained the required 2257 information in the proper format. A total of 258 performers were identified as appearing in the seventeen DVDs. Prior to the inspection, contract inspectors printed several still photographs of each performer's face from different camera angles. During the inspection, the still photographs were compared with the performer identification on record to ensure the identification was, in fact, of that performer.

After the inspection on November 16, 2006, it was determined Private had 2257 violations. These included missing photo identification for four performers and the DOB was not legible on one photo identification.

During this inspection, all provisions of 18 USC 2257 guidelines were followed by the inspection team.

FINDINGS

1. In the movie "Exotic Illusions," two separate performers used the stage name (P-1) but only one of the performer's photo identification was on file.

28 CFR Part 75.2 – "...the records shall also include a legible copy of the identification document examined and, if that document does not contain a recent and recognizable picture of the performer, a legible copy of a picture identification card."

2. No identification records were present for a male performer in "Witch Bitch."

28 CFR Part 75.2 – "...the records shall also include a legible copy of the identification document examined and, if that document does not contain a recent and recognizable picture of the performer, a legible copy of a picture identification card."

3. In the video "Fetish TV," the DOB for stage name (P-1) was illegible.

28 CFR Part 75.2 – "...the records shall also include a legible copy of the identification document examined and, if that document does not contain a recent and recognizable picture of the performer, a legible copy of a picture identification card."

4. In the video "I Only Love Real Couples," no photo identification was available for stage name (P-1) or a male actor appearing in scene four.

28 CFR Part 75.2 – "...the records shall also include a legible copy of the identification document examined and, if that document does not contain a recent and recognizable

Producer Response to Findings:

1. Photo identification was provided for both performers using the stage name (P-1). One was identified as (P-1). The other was identified as (P-1).

2. Photo identification was provided for (P-1).

3. A legible copy of (P-1) identification was provided indicating her DOB is (P-1).

4. Photo identification was provided for (P-1).

PRE-INSPECTION PROCEDURES

The following Pre-Inspection Procedures were followed:

1. Private was randomly selected from a data base provided by FBIHQ of known producers of adult products using a computerized random selection program.
2. A sample of Private DVDs was ordered and the method of purchase was documented and maintained in a 1A envelope with the case file.
3. All products ordered were reviewed for 18 USC 2257 compliance and a pre-inspection analysis was conducted for each of the DVDs ordered.
4. All performers depicted in the videos engaging in sexually explicit conduct were identified by either a stage name or by still photographs of their likeness taken from the video.

INSPECTION PROCEDURES

The following Inspection Procedures were followed:

1. Inspection began at approximately 10:00 a.m. during regular business hours.
2. SSA Charles Joyner, the Lead Inspector, immediately identified himself and the purpose of the inspection upon entering Pure Play Media, Inc.
3. SSA Joyner explained the nature and purpose of the inspection, including the limited nature of the records inspection.
4. Digital photographs were taken of the business and the room used to store 2257 information prior to the inspection. A disc containing a total of seven photographs was placed in a 1A envelope and maintained with the case file.
5. As Pure Play's 2257 records were all automated, [REDACTED] downloaded all of the requested 2257 information of the selected performers' identifications indicating date of birth on CDs provided by SSA Joyner.
6. After receiving the CDs containing the 2257 information, Inspectors later reviewed the 18 USC 2257 records maintained by Pure Play Media, Inc. to determine compliance with 2257.
7. The Inspectors left Pure Play premises at approximately 11:00 a.m.
8. Digital photographs were taken of the room used to store 2257 information prior to the inspectors departing the place of business.

RECORDS VERIFICATION SPREADSHEET

PRIVATE

VIDEO	DATE	PERFORMER NAME	DOB	TRUE NAME
HOUSE OF GAMES				
HOUSE OF GAMES				
HOUSE OF GAMES				
HOUSE OF GAMES				
HOUSE OF GAMES				
I ONLY LOVE REAL COUPLES	8/15/05			
I ONLY LOVE REAL COUPLES				
I ONLY LOVE REAL COUPLES				
I ONLY LOVE REAL COUPLES				
I ONLY LOVE REAL COUPLES				
I ONLY LOVE REAL COUPLES				
I ONLY LOVE REAL COUPLES				
I ONLY LOVE REAL COUPLES				
PORN WARS EPISODE 1	Jul-06			
PORN WARS EPISODE 1				
PORN WARS EPISODE 1				
PORN WARS EPISODE 1				
PORN WARS EPISODE 1				
PORN WARS EPISODE 1				
PORN WARS EPISODE 1				
PORN WARS EPISODE 1				
PORN WARS EPISODE 1				
PORN WARS EPISODE 1				
PRIVATE LIFE OF	Aug-02			
PRIVATE LIFE OF				
PRIVATE LIFE OF				
PRIVATE LIFE OF				
PRIVATE LIFE OF				
PRIVATE LIFE OF				
PRIVATE LIFE OF				
PRIVATE LIFE OF				
PRIVATE LIFE OF				
PRIVATE LIFE OF				
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REALITY NO. 14: THE GIRLS OF DESIRE	Aug-02			
REALITY NO. 14: THE GIRLS OF DESIRE	Aug-02			
REALITY NO. 14: THE GIRLS OF DESIRE	Apr-02			
REALITY NO. 14: THE GIRLS OF DESIRE	Apr-02			
REALITY NO. 14: THE GIRLS OF DESIRE	Apr-02			
REALITY NO. 14: THE GIRLS OF DESIRE	Feb-02			
REALITY NO. 14: THE GIRLS OF DESIRE	Jun-02			
REALITY NO. 14: THE GIRLS OF DESIRE	Jun-02			
REALITY NO. 14: THE GIRLS OF DESIRE	Jun-02			

(P-1)

(P-1)

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FBI_000842

PRIVATE

VIDEO	DATE	PERFORMER NAME	DOR	TRUE NAME
YOUR TIME IS UP		(P-1)		
YOUR TIME IS UP				
YOUR TIME IS UP				

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FBI_000845

PHOTO LOG/PHOTOS

CAMERA Nikon Coolpix 995
 LENS - Normal - N
 Wide - W
 Macro - M
 Tele. - T

LIGHT - Available - A
 Elec. Strobe - E
 Flashbulb - F

FILM : ASA Digital
 ROLL No. _____

Photo No.	Lens	Light	SS	f - stop	Description	Photo Log Sketch	REMARKS
1							
2					Private Title Page		
3					19800 front door		
4					Sign - use rear entrance		
5					Private back door		
6					2257 room - file cabinets		
7					2257 room - computer, discs		
8							
9							
10							
11							
12							
13							
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INSPECTION COMPLIANCE DETERMINATION

Private (Pure Play Media) was determined not to be in compliance with 18 USC 2257 and 28 CFR 75 as initially some performer identification records were missing.