

Reference: 02176941

Information Requests  
[information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)

17 April 2026

## Freedom of Information request: Right to know request

Thank you for your request for information about resources and costs - enforcement action against 4chan (Lime Wire LLC / Lain LLC).

We received this request on 19 March 2026 and we have considered your request under the Freedom of Information Act 2000 ("the FOI Act").

### Your request & our response

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***I request the following information relating to Ofcom's enforcement action against the operator of 4chan (understood to be Lime Wire LLC and/or Lain LLC), covering the period from 1 January 2025 to the date this request is processed:***

***1) The total number of full-time equivalent (FTE) staff hours attributed to the 4chan investigation and enforcement proceedings, broken down by team or function where possible.***

The total number of FTE staff hours was between 0.9 and 2.6 per month between July 2025 and March 2026. This includes team members from policy, standards, legal and enforcement.

***2) The total estimated cost to Ofcom of the enforcement action, including staff time, legal costs, and any external advice or services procured.***

Whilst we hold this information, it is being withheld as we consider that its disclosure is exempt under section 43(2) of the FOI Act. This exemption deals with information that, if disclosed, would, or would be likely to, prejudice the commercial interests of a person or company. In applying this exemption, we have had to balance the public interest in withholding the information against the public interest in disclosing the information. Annex A attached to this letter sets out the exemption in full, as well as the factors Ofcom considered when deciding where the public interest lay.

***3) The total value of fines issued to 4chan to date, and the amount of those fines that has been paid.***

In our Confirmation Decision, published on 18 November 2025 we stated:

***"5.36 In the event of continuing non-compliance, Ofcom is also imposing a daily rate penalty at a rate of £100 per day starting from 14 October 2025 (the day after the date this Confirmation Decision is issued) until whichever is the sooner of:***

- i. the date the 102(8)(a) duty is complied with in relation to both Notices;***

- ii. *the date of the first final decision ending the investigation announced on 10 June 2025 into suspected breaches of section 9(2) and/or 23(2) of the Act; or*
- iii. *60 calendar days starting from the day after this Confirmation Decision is issued. 5.37 We consider that capping the daily rate penalty at 60 calendar days is appropriate and proportionate to the nature of the breach.”*

The full statement can be found [here](#).

Following the completion of the 60 calendar days, the maximum penalty of £6,000 has been imposed. Details of the fines imposed are published on our website and can be found [here](#) in the financial penalties imposed between 1 April 2025 and 31 March 2026 section.

While we hold information regarding payment of the fine, we are unable to disclose this information as we consider that its disclosure is exempt under the FOI Act. In particular, under section 44 of the FOI Act, information is exempt from disclosure if its disclosure is prohibited by or under any enactment. The enactment that prohibits the disclosure of this information is section 393(1) of the Communications Act 2003 (“the Communications Act”). Under this section, we are prohibited from disclosing information with respect to a particular business that has been obtained in the exercise of our regulatory functions, unless that business consents or one of the statutory gateways under section 393(2) of the Communications Act is met, neither of which apply here. Section 44 of the FOI Act is an absolute exemption and therefore is not subject to the public interest test.

***4) Any internal or external legal advice obtained by Ofcom on the enforceability of Online Safety Act penalties against entities with no UK legal presence, establishment, or assets — specifically whether such fines can be collected without cooperation from US courts or authorities.***

We can confirm that we hold information in response to this request, however we consider it is exempt from disclosure under section 42 of the FOI Act. This deals with the exemption of information in respect of which a claim to legal professional privilege could be maintained in legal proceedings. In applying this exemption, we have had to balance the public interest in withholding the information against the public interest in disclosing the information. Annex B sets out the exemption in full, as well as the factors Ofcom considered when deciding where the public interest lay.

***5) Any correspondence between Ofcom and HM Treasury, DSIT, or any other government department regarding the prospects of collecting fines from 4chan.***

We can confirm we do not hold information in scope of this question.

***6) Any internal risk assessments or enforcement strategy documents relating to the collectability of penalties issued to overseas entities with no UK assets.***

We can confirm we do not hold information in scope of this question.

Yours sincerely,

Information Requests

**Request an internal review**

If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress. Please email the Information Requests team ([information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)) to request an internal review.

**Taking it further**

If you are unhappy with the outcome of our internal review, then you have the right to [complain to the Information Commissioner's Office](#).

Annex A

<p><b>Section 43(2) of the FOI Act provides that:</b></p> <p><b>“Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it)”.</b></p>	
Factors for disclosure	Factors for withholding
<ul style="list-style-type: none"> <li>• Disclosure would enable the public to gain a better understanding of the commercial relationships between Ofcom and third parties and the nature of the services provided, and thereby increasing public confidence in Ofcom’s work.</li> <li>• Generally, there is a public interest in the transparency of expenditure, particularly if public money is involved.</li> </ul>	<ul style="list-style-type: none"> <li>• Ofcom continues to negotiate its fees like those related to this request regarding legal service providers. To release the specific information requested would likely put Ofcom in a detrimental position for future fee negotiations by undermining its bargaining position with potential legal service providers.</li> <li>• In addition, the release of the detailed amount Ofcom paid would likely prejudice the commercial interests of the contracted legal firm – in that it would provide details of negotiated fees to its competitors or potential clients.</li> <li>• Ofcom contracts with a variety of companies in order to support its operations and has ongoing financial relationships with many of them. Companies need to be confident that information relating to their business, such as information relating to the charges for services, will not be disclosed if it would, or would be likely to, prejudice their commercial interests. Releasing companies’ commercially sensitive information might detrimentally affect their negotiating power in the future, and may deter them from partaking in our procurement exercises or providing us with services in future.</li> </ul>
Reasons why public interest favours withholding information	
<ul style="list-style-type: none"> <li>• We consider that, on balance, the potential prejudice to commercial interests outweighs the public interest in disclosure of the amount spent on legal fees regarding this case.</li> <li>• We consider that, on balance, the public interest in withholding disclosure of the requested information outweighs the public interest in disclosing the information.</li> <li>• Ofcom enjoys a positive relationship with those organisations it contracts with. The release of information which would, or would be likely to, prejudice commercial interests</li> </ul>	

into the public domain would impair both Ofcom's relationship with providers of services, and adversely affect its commercial relationships with them. Similarly, Ofcom's bargaining position, and therefore ability to obtain value for money in services it contracts for, may be undermined in future negotiations if details about the cost of these services were disclosed.

- Weighing the issues presented, it is considered that on balance, the factors for withholding the requested information outweigh those for disclosing the information.

**Annex B**

<b>Section 42 – Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings is exempt information.</b>	
<b>Factors for disclosure</b>	<b>Factors for withholding</b>
<ul style="list-style-type: none"> <li>Ofcom recognises that the legal position behind the 4Chan investigation is a matter of interest to the wider public. Releasing such information could be said to increase transparency in our work and allow for discussion in a public forum.</li> </ul>	<ul style="list-style-type: none"> <li>The documentation in relation to which the exemption is claimed reflects advice regarding the enforceability of imposing fines on extraterritorial organisations.</li> <li>These documents contain information which is subject to legal professional privilege, as the information was made for the purpose of providing or obtaining legal advice about ongoing, or contemplated litigation.</li> </ul>
<b>Reasons why public interest favours withholding information</b>	
<ul style="list-style-type: none"> <li>We consider that, on balance, the potential prejudice to legal professional privilege outweighs the public interest in disclosure of Ofcom’s legal advice regarding the 4Chan investigation.</li> <li>It is in the public interest that decisions taken by Ofcom in relation to policy development, enforcement, and litigation are taken in a fully informed legal context, where relevant. Ofcom therefore needs high quality effectively obtained legal advice for the effective conduct of its business. That advice needs to be given in context, and with a full appreciation of the facts. It needs to be sought and given in a timely fashion to ensure that policy develops in a fully informed way.</li> <li>Legal advice cannot be effectively obtained unless Ofcom is able to put all the facts before its in-house legal advisers or external counsel without fear that they may afterwards be disclosed and used to its prejudice. Without such effectively obtained advice, the quality of Ofcom’s decision making would be much reduced because it would not be fully informed and this would be contrary to the public interest.</li> </ul>	