

I agree with the FTC that legal action should be taken against Mr. Craig Brittain. I do think the penalty should be harsher. His websites exploit the privacy and trust of the victims whose photos are posted on the website. He adds further injury by coercing them into paying a ridiculous high fees in order to for the victim to remove the photo. The harm done to the victim of these types of websites goes beyond mere privacy and dignity, and can potentially be lethal.

We live in a digital age. Almost everything today is done online. With the existence of social media, everyone has the ability to look into everyone's personal life. This also leads to people being able to search or look up other people. It is through this culture that emerged what is now deemed cyber bullying. Once something is on the internet, there is a good chance it is there forever. Because of this, the violation to the victims do not just happen once a picture is posted without consent, but repeats the violation with every new visitor to the website. Therefore, it is important that the FTC is taking an active role in pursuing these types of websites.

One doesn't need to look hard to find the harmful effects cyberbullying has on the victims. A representative example of cyberbullying is with the story of Amanda Todd. Ms. Todd, a teen committed suicide after explicit photos of her circulated on the internet. See <http://www.newyorker.com/culture/culture-desk/the-story-of-amanda-todd>. In Amanda Todd's case, the predator exploited Todd by threatening to show her friends and family explicit pictures of Todd over the internet. See *Id.* By threatening Todd with the guilt and shame of the photos, the predator was able to blackmail Todd. Eventually, Todd had enough and killed herself.

There is little difference in the way that Amanda Todd was exploited and how Mr. Craig Brittain exploited the victims on his website. They both prey on the emotions of the victim. In Mr. Craig

Brittain's case, he is aware of the fact that people are uncomfortable with being exposed like the victims of his website. He uses this feeling to try to exploit the victims into giving him money in order to "remove" the explicit pictures from the website. In this way, he has put himself in the same position as the predator in the Amanda Todd case.

For all of this, Mr. Craig Brittain's consequences are that he can no longer disseminate explicit images or videos of people without their consent through a website or online service according to the current agreement. Nor can he misrepresent himself whether acting directly or indirectly in connection with marketing, promoting, or offering for sale any good or service. The language used in the agreement is incredibly narrow. Applying the canon of *eiusdem generis*, one would only be able to limit his actions to very limited situations. Despite the great harm and exploitation Mr. Brittain has done, he is getting away with a mere slap on the wrist. This can be achieved by stricter consequences. The first would be to reduce Mr. Brittain's access to the internet all together. Another would be ban his ability to post explicit images online, and not just those where he has consent. This would prevent any possible chance for a loophole and sends a clear message that cyberbullying is not tolerated.