UNITED STATES OF AMERICA
Federal Trade Commission

Office of the Secretary
600 Pennsylvania Avenue, NW
Washington, DC 20580

March 31, 2014

Brownell
State of Florida

Re: In the Matter of Goldenshores Technologies, LLC, File No. 1323087

Thank you for your comment on the Federal Trade Commission's consent agreement with Goldenshores Technologies, LLC, and Mr. Geidl ("respondents"). The Commission has placed your comment on the public record pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii), and has given it serious consideration.

Your comment recommends that respondents face criminal prosecution. The Federal Trade Commission is a civil agency and does not have authority to criminally prosecute individuals for violations of the FTC Act. The FTC also does not have authority to issue fines or civil penalties under the circumstances of this particular case. However, should respondents violate any term of the final order, they could be liable for civil monetary penalties of up to $16,000 per violation (pursuant to Section 5(l) of the FTC Act).

The Commission is committed to safeguarding consumer privacy and believes the proposed order will accomplish this objective. In particular, Part I of the proposed order prohibits respondents from misrepresenting the extent to which its mobile applications collect, use, disclose, or share covered information. It also prohibits respondents from misrepresenting the extent to which users exercise control over the collection, use, disclosure, or sharing of information collected from or about them. Part II of the proposed order requires respondents to (1) disclose, among other things, that they collect or share geolocation information prior to the collection or transmission of such information, and (2) obtain consumers' affirmative express consent to the transmission of such information. Part III of the proposed order requires the company to delete information already collected from consumers through the Brightest Flashlight App.