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**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION**

submitters were men sending photographs of women. Respondent required that all submissions include at least two photographs, one of which had to be a full or partial nude, as well as the subject's full name, date of birth (or age), town and state, a link to the subject's Facebook profile, and phone number. Respondent received and compiled the photographs and personal information, posted them on the Website, and in some instances, Respondent posted additional personal information that he independently located about the subjects.

6. Second, Respondent posed as a woman on the Craigslist advertising website and, after sending other women photographs purportedly of himself, solicited photographs of them

12. Respondent has operated an additional website, obamanudes.com, which largely displayed the same content as isanybodydown.com.

COUNT I

THEREFORE, the Federal Trade Commission this ____ day of _____, 2015, has issued this complaint against Respondent.

By the Commission.

Donald S. Clark
Secretary