

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 with their intimate parts exposed in return. If they sent such photographs, Respondent posted them on the Website without their knowledge or permission.
7. Third, Respondent instituted a "bounty system" on the Website, whereby anyone could request that others find and post photos of a specific person in exchange for a reward of at least \$100. Respondent collected a "standard listing fee" of \$20 for each request and half of all rewards given.
8. After obtaining the photographs, Respondent grouped the photographs on the Website by the State of residence of the photograph's subject. Visitors to the Website could post comments about the photographs. Such comments often included derogatory and sexually explicit language directed at the subject of the photograph. Indeed, Respondent touted the Website as superior to similar websites because the Website produced a "higher level of hatred" than other websites. During the time the Website operated, Respondent posted personal information and photographs of over 1,000 people with their intimate parts exposed.
9. Women whose photographs appeared on the Website often contacted Respondent to request that he remove the images. They reported that they suffered significant harm from having their photographs and personal information, including location information, posted on the site. Some received unwelcome contacts from strangers, including requests for additional photographs. Many worried about harm to their reputations.

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

COUNT I
RESPONDENT'S UNFAIR PRACTICES RELATING TO
POSTING OF PHOTOGRAPHS AND PERSONAL INFORMATION

13. Through the means described in Paragraphs 4 through 12, Respondent disseminated photographs of individuals with their intimate parts