



Florida Action Committee, Inc.
P.O. Box 470932
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www.floridaactioncommittee.org

April 12, 2016

Florida Department of Law Enforcement (FDLE)
Missing Persons and Offender Registration
2331 Phillips Road
Tallahassee, Fl. 32308

SENT VIA EMAIL
sexpred@fdle.state.fl.us

RE: RECENT CHANGE TO THE DEFINITION OF "INTERNET IDENTIFIER"

To Whom It May Concern:

I am writing for guidance on the recent change in the definition of "Internet Identifier" found in F.S. 775.21.

HB 1333 was recently signed into law by Governor Rick Scott. Among other changes, the definition of the term "Internet Identifier" was expanded to include the following:

"Internet identifier" includes, but is not limited to, all website uniform resource locators (URLs) ... used for Internet communication, including anonymous communication, through electronic mail, chat, instant messages, social networking, social gaming, or other similar programs and all corresponding usernames, logins, screen names, and screen identifiers associated with each URL ..."

Of specific concern is the language *"all website uniform resource locators (URLs)"*.

A URL is the address of a specific webpage or file on the internet. It is generally comprised of the *prefix* or protocol (such as <http://>), the *domain* or server name (such as google.com) and the *path*, which is the location of the page or file on the domain (such as [/offender/Important.jsp#New](http://offender/Important.jsp#New), where the re-registration requirements can be found on the FDLE site).

There exists hundreds of millions of URLs on the Internet. Our organization's own domain; floridaactioncommittee.org, for example, currently has over 878 pages, each with a unique URL.



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If one of our members wanted to contribute information in our forum, ask a question or comment on an article, would it be sufficient to register their username at "floridaactioncommittee.org", or would they have to repeat the process multiple times for multiple URLs on our domain to which they wanted to comment in advance of each submission? If it's the latter, active contributors could potentially have hundreds of URLs "registered" for the floridaactioncommittee.org domain.

Our concern is not limited to our own website. A registered individual who is looking for a job would not just be required to register the job site they are searching on (for example; indeed.com), but the URL of every single job posting they applied to (for example; <http://www.indeed.com/cmp/Quietvox/jobs/Reservation-Data-Entry-d9fd713392156acb?q=data+entry>). An individual who is sourcing product on a directory (such as Alibaba.com, for example), would not just be required to register their username with the domain alibaba.com, but the URL for each vendor they contacted or product they submitted an inquiry for - as each one has a different URL.

The new requirement would render some jobs effectively unfeasible for registered citizens, as many businesses have web-based interfaces or portals, where every client id or order number has a unique URL that would have to be registered under the new law. To be compliant, that individual would need to stop what they are doing before every single entry, open the FDLE portal, register the URL and then resume their work. In many cases, this process would need to be done hundreds of times per day.

Another question we have is whether this URL information can be obtained through a public records request the same way registrant's emails can. Can a business competitor or vigilante request all these registered URLs from the FDLE?

The new URL requirement is not only horrifically burdensome, overly broad, strips registrants of their right to engage in constitutionally protected free speech and an extreme invasion of privacy but comes with a very scary risk. An innocent oversight or misinterpretation of the requirements is a third-degree felony, which could subject the registered citizen to years in prison.

I look forward to your guidance.

Sincerely,

Gail Colletta, President
Florida Action Committee, Inc.
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