

Technology, Freedom, and the Persistence of *Nineteen Eighty-Four*: Becoming Critical Consumers of Our Freedoms

Amanda Wlock

Introduction

In an age of information, literature is more and more unceremoniously being pushed to the sidelines of the classroom in favor of media, science, math, and technology. Among these important subjects, however, literature must be allowed to stand with them as an avenue to understand humanity and the human condition. Many classical works, though seemingly irrelevant to our modern age, have shaped our perceptions, ideas, and language since their inception and offer the experiences of humanity and the human condition. George Orwell and his publications occupy such an eminent place. Though long past *Nineteen Eighty-Four*, Orwell's totalitarian nightmare still resonates in the bedrooms of our conscious minds through the omnipresence and intensity of his themes and observations. *Nineteen Eighty-Four* continues to tantalize readers with the question: can the world of *Nineteen Eighty-Four* ever exist? Regardless of the time stamp Orwell emblazoned on his title page, *Nineteen Eighty-Four* was just as possible in 1949 as it could be (and is?) in 2013, and that is the selling point for Orwell in the twenty-first century classroom. *Nineteen Eighty-Four* persistently haunts the new century, especially as we see the rapid developments of our own telescreens and speakwrites. Orwell's thunderous warnings repeat the same message—beware the government's control over the people, their freedoms, and their histories.

Rationale

I chose to create this unit based on the ubiquity of technology and its effects on the younger generations that have grown up always knowing how to operate a computer, search the Internet, and participate in online social communities and networks. While the discussion of the advantages of the internet and social media is one worth having—indeed, such things have inspired revolution and deposed governments in countries like Egypt and Syria—I want my students to interrogate this entity that has infused itself to their culture and upbringing. Using *Nineteen Eighty-Four* as a backdrop and a dystopian warning to the dangers of technology and power, I want students to gain awareness of the struggles for control, and what part they play in shaping their future and the freedoms they now and will enjoy.

The overall intention of this unit, be it for graduating seniors or new freshmen, is for students to become critical consumers of their own freedoms. This is not to say that a critical consumer completely extracts him/herself from the economic means of production; a critical consumer has the background knowledge and is aware of the implications and equivocations of technology and how that defines their sense of privacy and freedom. Whether students are going to college, entering the workforce, or participating in the armed services, how does the knowledge of our freedoms in America and in the world impact them today? What insight can Orwell provide us?

What do the abstract freedoms like love and liberty mean to us? The classroom should be a place where these questions and the larger rhetoric of freedoms can be questioned, challenged, answered, and applied.

Demographics

Appoquinimink High School is located in Middletown, Delaware, a suburban/rural city that has seen considerable, rapid population growth and civic development. The school was constructed in 2008 and first housed only freshmen and sophomores; the first senior class of AHS graduated in the spring of 2011. Based on data from 2010-2011, the gendered population of AHS is comprised of 47.3% male students and 52.7% female students.¹ Racially, the student body represents 65.4% Caucasian students; 25.3% black;² about 3% Asian and about 4% Hispanic.³ Within that student body, AHS reports that 13% of its students qualify for free lunches, and 3% of students benefit from reduced-price lunches.⁴ AHS has implemented a block schedule with one class period lasting ninety minutes.

Given its young age, the building and campus boasts beautiful landscaping with state-of-the-art technology on par with technical and vocational schools throughout the state. Almost every classroom is equipped with SMART board technology; teachers have computers in every room that connect to both SMART boards and televisions; teacher computers are allowed access to internet resources like Youtube.

Though this unit is designed with twelfth-grade students studying British Literature specifically, the background information, questions, resources, and activities could be adapted for any grade, and would be especially appropriate for eleventh-grade students studying American Literature and discussing the concepts of freedom as they are represented and written about by American writers throughout American history. Because *Nineteen Eighty-Four* is a modern text, notably in comparison to authors like Shakespeare, the text would be accessible to varying reading levels in the classroom, and other resources like music videos further lend themselves to multiple reading and comprehension levels, as well as different types of learning styles.

Constitutional Laws Concerning Privacy

Overview

A survey of history and law may serve as a good introduction and activating strategy for this unit; to that effect, included are the first and fourth amendments to the United States Constitution. When it comes to privacy, many Americans are under the false assumption that individual privacy is explicitly protected by the Constitution; the first and fourth amendments being the provisions most frequently cited. However, the rhetoric of the Constitution is vague and neglectful of any specific verdict. In connection to Orwell, *Nineteen Eighty-Four* discusses and alludes to the function of laws in Oceania—a good activity for comparison—and chapter nine of part two especially deals with the concept of the law and how Big Brother and the Party have used laws for the means to their own ends in gaining power and control. Furthermore, the

ambiguity of language would also be an excellent point to connect on given its thematic significance to Orwell.

First Amendment

Typically the first amendment is the “go-to” on matters of individual rights and is inaccurately cited as proof of the legal protections of privacy in America.

“Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press, or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.”⁵

Fourth Amendment

The fourth amendment is cited almost as frequently as the first, but specifically to debate the security of individual privacy within homes. This amendment comes in to play often when dealing with cases of wire-tapping a home or using infrared technology/heat seeking devices aimed at homes.

“The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable search and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the person or things being seized.”⁶

Privacy Laws in the United States

Overview

Scholar Peter Manning’s review essay denotes that there is a distinct tension between the philosophies of “surveillance” and “democracy,” though it is a curious tension given that there is no one, agreed-upon definition of either term. Manning poignantly conceives it thus: “the point appears to be that privacy and human rights must be defended in democracies, yet democracies to defend themselves are moving evermore toward systematic data gathering and use in the process or ordering.”⁷ The inherent paradox dictates, then, that people—perhaps we may say here especially Americans given our short yet volatile history—believe that their lives, rights, and privacies should be protected under the flag of democracy. However, how can democracies effectively and pervasively protect those lives, rights, and privacies without the proper data to know who needs protecting and who is a threat to that protection?

Historically, concerns about privacy have been associated with two phenomena: the expansion of governmental powers in response to world events like World War II, the Cold War, the creation of the FBI, and the Watergate scandal; and the increasing use and development of technology capable of widespread surveillance. These events culminated in a spectacular orchestration of privacy concerns, outrage, anxiety, and the eventually passage of privacy laws in the United States. It may shock students to realize that there is no explicitly constitutional right to privacy. The relatively sudden outbreak of privacy concerns over the last few decades have

been in part due to the realization of what personal, private freedoms are being threatened; the extremely quick evolution of technologies; and the attempt to draw a defined line between needed surveillance and unobserved private living. Indeed, many scholars trace the legacy of privacy concerns and privacy laws to an 1890 law review article from Harvard by Samuel Warren and Louis Brandeis. In that article, Warren and Brandeis attacked the privacy violations of newspaper reporters who published private information about the lives of private people. Scholar Christopher Pyle recounts the ideals behind this attack and notes that the “concept of informational privacy did not win widespread report [...] until the rise of internal security and social service bureaucracies in the post-World War II era, and the development of the new technology of computers and telecommunications.”⁸ Because technology capable of surveillance changes so rapidly, it makes sense, as Manning suggests, that our understanding of privacy itself is changing. And that may be most fitting for this era of hyperactive progress and advancement where laws (some briefly introduced below) governing technology, surveillance, and privacy are actually out-of-date by the time a law is passed.

Federal Trade Commission (FTC)

Acting as the federal privacy regulator in the nation, the FTC has been responsible for the plethora of privacy/data investigations, controls, and rulings. It monitors the adherence to such acts as the Children’s Online Privacy Protection Act, the Fair Credit Reporting Act, and the Health Insurance Portability and Accountability Act, among others. With the tremendous inundation of social media sites and their uses—indeed, statistics report that “66% of online adults use social media, and hundreds of millions of people regularly use social media and networking tools”⁹—the FTC has also shouldered the task of implementing and enforcing rules for those social media and networking sites. Though the newest social media sites still occupy a gray area in terms of potential privacy and Fourth Amendment violations, the FTC has made strides to force those sites to be accountable of the information they store by creating guidelines of best practices and settlement plans.

Omnibus Crime Control and Safe Streets Act, (Title III, “Wiretap Act”) 1968

During the 1960s, concerns arose about invasions of privacy by law enforcement agencies, particularly the FBI’s surveillance of suspected political radicals. In 1967, the Supreme Court ruled that telephone conversations were subject to the Fourth Amendment and required the police to have probable cause to wiretap them.¹⁰ A year later, the Court passed the Omnibus Crime Control and Safe Streets Act with a title specified to telephone communications, their use in crime control, and the requirements and criteria the government had to follow in cases regarding wiretapping. What became known as the “Wiretap Act” mandated that it was “a crime to intercept telephone calls except with a judge’s warrant or under some relatively narrow exceptions.”¹¹ The glaring caveat to this act, however, is that the law only applied to wiretapping of voice communications over a wire or face-to-face conversations. Of course, the subsequent decades have revealed an explosive evolution of technology, and a little more than ten years later, the first wireless telephone services of the 1980’s made the law practically obsolete, or at least in need of a serious rhetorical face lift. The revolution of the 1980s has become banal, routine and ineffectual to the 2000’s: communication became through data, not voice. The transaction of life via mobile devices and email surpassed the severity of the Wiretap Act, and

the Court began drowning in the ambiguity of how these new technologies fit into the rhetoric of the Fourth Amendment. Loathe to halt the progress of the technological engine, Congress then created the Electronic Communications Privacy Act (ECPA) in 1986.

Fair Credit Reporting Act (FCRA), 1970

This act is specifically mentioned here as one of the foundational acts to those subsequent involving private information that can be/is collected, stored, and disseminated electronically, and it has particular application now to the booming use of social media and networking in the job market. The advent of instant messaging, Myspace, and Facebook—and now add Twitter, Google+, Instagram as well—brought with it a novel space in which employers could check on potential employees' actions, behaviour, character, and so on with the notion that these social networks might verify and/or expose a potential employee's flaws enough that the company could fire that employee, not hire them, or simply be assured that they had hired a good employee. Such devices have proven logical and illuminating. However, these [pre] background checks via social media networks may cause an employer to come under fire concerning the liability under FCRA that expressly protects the accuracy and private nature of a consumer's credit reports.¹²

Though the FCRA appears to deal mostly with monetary information, it is equally concerned with character and reputation information and protects individuals from false claims or representations of character. For example, mobile applications, or apps, that provide background screening services were cited in 2012 by the FTC allegedly for including information on criminal histories which “bear on an individual's character and general reputation and typically are used in employment and tenant screening.”¹³

Electronic Communications Privacy Act (ECPA), 1986

In an attempt to allow for the progress and evolution of technology while still protecting the people highlighted in the Wiretap Act, Congress “added wireless communications and data communications to the Wiretap Act, making it clear that government agents needed a judge's warrant to intercept such communications in transit.”¹⁴ A resulting debate arose over e-mail and whether or not the act should be altered depending upon the status of an e-mail, i.e. whether it was in storage or in transit. With evidence that stored e-mail that was simply left could be considered “cold storage” after a certain amount of days, older e-mails were not covered under that statute, along with “transactional data”¹⁵ such as the numbers or dialing information one might need to dial to place a call.

Children's Online Privacy Protection Act (COPPA), 1998

For the recent generations growing up in the soft glow of the computer screen—as well as the television screen, video game screen, Game Boy screen, cell phone screen—there are websites and products that target children. In order to protect children from faulty or dangerous websites, as well as online predators, website operators and online companies must observe the COPPA rule. It dictates that if a company is directing information to or collecting information from a child under thirteen years of age, the company is required to: post a privacy policy; provide

notice to parents; give parents choice to consent to the information being collected and/or used; provide parents with access to their child's information and the freedom to opt out or change that information; not allow a child to participate in the online product (e.g. an online game); and many other conditions.¹⁶ This is very much akin to what cable and internet providers offer now with parental locks on certain channels or websites, what schools do now with filtering certain websites within the school's online system, and so forth. It is of additional concern to these online operators that if there is a homepage that can only be accessed via age verification that it is not too easy for a child to input a false age. Overall, the primary apprehension is not over the fact the data is taken and utilized, it is over whether or not that particular facilitation of data collection is putting children at a greater risk. Essentially, the companies still want data, but they want to make¹⁷ sure they can obtain that data in a way that is not going to get them blasted by parents and data protection agencies.

Provide Appropriate Tools Required to Intercept and Obstruct Terrorism (PATRIOT) Act, 2001

In the earth-shattering events of 9-11, the people's eagerness for action took the form of traditional warfare and technological warfare. Passed in the same year of the terrorist attacks on the World Trade Center in New York City, "the purpose of the USA PATRIOT Act is to deter and punish terrorist acts in the United States and around the world, to enhance law enforcement investigatory tools, and other purposes."¹⁸ These "other purposes" include measures like the increased monitoring and empowered action to prevent and persecute money laundering and potential terrorist funding; amplified scrutiny of foreign financial transactions, as well as actions against bribery and the repatriation of stolen assets. What Orwell exemplifies in *Nineteen Eighty-Four*, however, is the connection piece. How is it that the government is going to monitor and search for those potential laundering schemes or bribes? How else but by searching e-mails, texts, social media accounts, and the like? And the government cannot alert the suspected party of their actions as this would cause that suspected party to relocate, close various accounts, reroute networks, and so on. So the government must do so in secret; in order to maintain peace and safety, Big Brother can justify his "Peeping Tom" actions.

Wireless Communications and Public Safety Act (WCPSA), 1999

Akin to the development of the ECPA to cover issues with wireless technology not anticipated in the Wiretap Act, the WCPSA further attempts to delineate the boundaries between public access and personal privacy while still aiding the beneficial progress of the newer technologies. The WCPSA enacts that all cell phones made after 2000 must include a mapping system capable of linking to a GPS device. While this can be and is advantageous in an emergency situation where response teams and vehicles can find a person in need, the act had to clarify this law due to the concerns that a cell phone could actually be tracked at any time. In reaction, the act expanded and explains that those cell phones must include an "opt in" consent that would give cell phone providers permission to collect data in non-emergency situations.

[Surveillance] Technology

The question before the world now in this era of "massively mediated social relationships"¹⁹ is whether surveillance via any method "increases choice or diminishes it, increases inequality or

reduces it, is a source of populist power or a governmental tool”²⁰ is still a stance needing defined establishment. The benefits of the internet are as boundless as its dangers; though “Google Amazon, Facebook and Apple [...] have custody of the raw material of hundreds of millions of lives—the intimate e-mails, the revealing photographs, searches for help or love or escape,”²¹ as a people we are so enchanted with the possibilities of data and its power to connect the whole world. Social media has sparked revolutions and toppled governments, and the incessant outpouring of progress and innovation is intimately linked with the hopes of combating world hunger, cancer, and war. As history has shown, significantly evolved modernity accompanies the question of control—who has it and how much of a limit should be placed upon those developments? In order to maintain this lightning-fast advancement, should more leeway in legality be allowed because of the proven, tangible benefits? In agreement, “most tech companies reject the need for more regulations. New laws will quash innovation right when it’s most needed and could threaten the nature of the Internet, they argue.”²² However, the unmatched willingness to trade in control for technological access cannot come without sizeable strings attached. To be cliché, there is no such thing as a free lunch, and the proverb certainly applies to the technological banquet spread out before the twenty-first century masses. There must be a price to this surrender: “the loss of control, or even knowledge, of where the personal information is going and how it is being reshaped into an online identity that may resemble the real you or may not.”²³ How much, then, are we invested in our authentic selves and their protection?

Google

Of the plethora of technologies and systems floating within the cyber cloud, perhaps none have come to grips with the law as frequently as the massive search engine Google has in recent years. Despite Google’s “street cred” as a hip and progressive company, it has simultaneously become the brunt of equally expansive outrage and concern from the collective masses that argue “it wields a tremendous weight unfairly [...] it ignores local laws” and “privacy advocates [who] think it takes too much from its users.”²⁴

The first wave of outcry came in 2007 from European nations over Google maps’ Street View feature which allows users to see snapshots of a location. If a person wanted to find their friend’s house for the first time, Google maps²⁵ provides a directions and mapping graphic, but Street View allows the driver to see a picture of the street where the house/building is located in order to identify landmarks, the house colour, what cars to look for in a driveway, etc. While certainly a convenient feature for visually-sensitive consumers, or simply those who want a definite picture of where they might be going, privacy violation outweighs convenience in Europe where such privacy laws are tougher than in the US. Undoubtedly some of that protest originates from the historical underpinnings of the use of government data by the Nazis and East German Stasi to scrutinize perceived enemies or unwanted populations.²⁶

Google came under fire again in 2011 due to an FTC claim that its 2010 launch of Google Buzz, a social networking feature through Gmail, “involved deceptive tactics and violated Google’s privacy policy.”²⁷ This led to an announced change in January of 2012 of Google’s privacy policy that was described as a way to streamline all data through Google, rather than through separate systems. In March, then, Google “began creating a single profile for each user

by combining the data it collects about that user from its various websites and services via small cookie files.”²⁸ In Google’s 2012 policy it was notated that “for people logged in to a Google account, Google can use information shared on one service in other Google services.”²⁹ For example, if a user searches Youtube for kitten videos, that user’s Youtube homepage would program in and display recommended videos of kittens based on information garnered from the Youtube search engine. Google also made attempts to keep with European privacy laws after its 2010 and 2011 fiascos by asserting it would only collect data on encrypted, private networks if user’s “opted in” and consented to their information being collected. Nonetheless, good business sense must also prevail and, by simple cause and effect, “if large numbers of users opt out, Google’s advertising revenue would suffer.”³⁰ Endeavoring to satisfy financial reasoning and privacy crack downs in Europe, Google created this policy and “opt in” feature, “but opting in essentially became a requirement of using each of the services, by clicking the ‘I Agree’ button before using the service for the first time, after the new policy went into effect.”³¹ In these equivocal twists of business, Google could offer consent to please data protection agencies, but then make “opting out” a near impossibility to ensure that revenue from products advertised and sold would not suffer. Though it appeared to fly under the radar for a few months, and along with simultaneous objections about Google’s Street View mapping feature, the license for Google to gather, analyze, and reconstruct targeted data for consumers brought it to the FTC chopping block. In August of 2012, Google was fined \$22.5 million, “the largest civil penalty ever levied,” by the FTC for allegedly bypassing privacy settings in Apple’s Safari browser. The nature of the violation indicated that Google had tracked users’ browser to collect marketing information and then show those users products and ads targeted to them based on information collected from their browser searches.³² Though Google’s privacy policy does include a clause for collecting information of user’s logged on, because Safari is an Apple product and was not included in Google’s policy, Google was still fined.

While Google altered and adjusted its privacy policy as promised, 2012 also bestowed upon Google more European concerns with its Street View map feature. To create Street View and amass data, Google admitted to collecting private data as its Street View cars were out across the globe taking pictures of streets, houses, and buildings for the map feature. Alarm swelled when Google failed to present the data when asked to reveal its information collected, then it claimed that it could not find some of its Street View cars. Google intimated that only a few, selected individuals in the company actually knew what data was being collected and for what it was being used. In May 2012, however, and after considerable amounts of time in negotiation, “Johannes Caspar, a German data protection official forced Google to show him exactly what its Street View cars had been collecting from potentially millions of his fellow citizens. Snippets of e-mails, photographs, passwords, chat messages, postings of Web sites and social networks—all sorts of private Internet communications—were casually scooped up as the specially equipped cars photographed the world’s street.”³³ Yet, Google stands by its claim that they have, in fact, not broken any privacy laws. As per its privacy statement, something that is also similar to Microsoft, Google maintains that its policy guards users only if they are using protected wireless. Accordingly, since the information the Street View cars acquired came from unencrypted networks, Google has moved for dismissal of the allegations.³⁴

As a direct result of the antitrust regulations and cyclical debates over privacy laws and policies, more than twenty European data protection agencies in October 2012, following the

example of the likes of Johannes Caspar, have again asked Google to modify their January privacy policy edit. Addressed by Larry Page, the chief executive of Google, the policy alteration would affect “dozens of Google online services—including the flagship search engine, Android mobile phone apps and Youtube videos—so that users have clearer understanding of what personal data is being collected and can better control how that information is shared with advertisers.”³⁵ While a fair request on many levels, Page responded that he was disheartened by the demand and the attempt to quell data collection as, he remarked in perhaps a tell-tale sign of the times, “nobody knows how the Internet will function in a decade.”³⁶ Since the express purpose of the data was to collect information to tailor advertising to Google consumers, Page further argued that as a business Google is obliged to find those means by which the company can more effectively target and sell products. Again, this is a logical argument that has gone hand-in-hand with business endeavors since the dawn of industry and dealing; however, it continues to reflect the complicated nature of business in the cyber age, the adoration of technology, and the balance of power and privacy.

While much of the legalities and uproars came from Europe, reports like David Streitfeld and Kevin J. O’Brien from *The New York Times* predict that American data protection agencies and regulators are not far behind in mimicking the clamours from their European counterparts. But this is yet to be seen. In perhaps the most telling remark reported throughout Google’s tumultuous year of 2012, communications technology researcher Christian Sandvig from the University of Illinois observed that, “we don’t have much choice but to trust Google, [...] we rely on them for everything.”³⁷ Perchance the Orwellian warning is knocking at the doors again. Where Oceania depends solely and absolutely on Big Brother’s interpretation of events and notions of history, Oceania has allowed Big Brother total control over all information so there is no other place to look for counter ideas and knowledge. Google may indeed be amassing a similar exploitive power as per Sandvig’s glum opinion. Does this then justify Google’s actions? If the American people willingly place their reliance on Google, sacrifice their informational independence on the altar of convenience and one-stop shopping, how can we then bring Google under fire for violating that which was given up anyway?

Microsoft

Parallel to Google’s forced privacy policy changes in 2012, Microsoft more recently in October of the same year instituted its own revamped privacy policy. Via this new policy, Microsoft establishes that it can broadly gather data and utilize any personal information collected in that data sweep provided those records came from its free, web-based services like email (Hotmail), searches, the Buzz feature, and instant messaging. “Almost no one noticed, however, even though Microsoft’s policy changes are much the same as those that Google made to its search rules the year.”³⁸ Again like Google, the devil is in the semantics of how these “Services Agreements” are written. Microsoft has reportedly promised not to use personal information it create targeted ads, which is purportedly one major reason why Google changed its policy in January because it in fact wanted that power, but reporters Edward Wyatt and Nick Wingfield from *The New York Times* assert that, in truth, “Microsoft wants to be able to compile massive digital dossiers about users of its services and monetize them.”³⁹ Given the precedent Google has set in terms of its business, it seems to be a scathing but probably true statement despite promises.

Ultimately that seems to be the most accurate assessment. In this capitalist economy, the new, digital arms race is for monetary gain and ever-increasing market dominance. Whether or not the means justify the ends, to get to that “ends” it appears that companies are willing to whatever it takes to win that race, and for now that exponentially increased evolution of technology versus the comparatively tortoise-paced realization of, engagement with, and development of privacy policies and laws gives companies like Google and Microsoft the advantage. In reality, no one knows nor understands exactly how the data is being synthesized and employed and, as Wyatt and Wingfield emphasize, “no single authority oversees the collection of personal information from Web users by Internet companies. Though most companies have written privacy policies, they are often stated in such broad, ambiguous language that they seem to allow virtually any use of customers’ personal information.”⁴⁰ Again, the Orwellian state looms on the horizon. The “doublespeak” of language that has long been the fodder for critique and lamentation in politics and laws in general has completely infiltrated business ventures and business law. Without concrete, black and white understandings of language, terminology, and policy, companies like Google and Microsoft are wont to continue in their pursuit of loopholes to achieve their monetary ends. Until the people can come to one distinct definition of what privacy is and how it may be violated in every single permutation, we are conceivably doomed to prolong this process of prosecution and monitoring, change and circumvention.

Social Networks

Facebook

The boom of social networking sites has created a similar concern in data collection as Google and Microsoft, but offers a different apprehension when it comes to one’s digital presence in cyberspace and permanent digital footprint. Facebook conducts similar data sweeps to gather personal information about a person—sex, age, interests, activities—to tailor advertising and offer a more personalized experience of social networking. Like Google, Facebook allows for ads on a user’s homepage but, just as one might see in a Gmail account, those ads are specifically linked to an individual’s sex, age, interests, and activities that they have displayed on their Facebook account. In November of 2011, Facebook came under scrutiny by the FTC for that practice under allegations that “Facebook misrepresented its privacy policy to users and failed to protect sensitive consumer data. [...] The FTC claimed that certain information that may have been designated as private was made public without prior notice to users, and such information remained publicly accessible even after users deactivated or deleted their accounts.”⁴¹ And this supposed deactivation and account deletion is the crux of the matter. Many users are unaware that deleting a Facebook account erases next to nothing of that user’s information. While the account is gone and contacts removed, the digital presence or footprint remains and the information attached to that footprint can still be accessed by Facebook data systems. Though sneaky, if an individual says to the effect that “I do not want to monitor this information via my Facebook account,” how much truly hinders Facebook from amalgamating that information into its larger databases? Yes, Facebook came under fire for this, but as indicated above with Google and Microsoft, there is no one law in place to convict Facebook to the fullest extent.

If all of this online culture and privacy anxiety is too much for a person, there is a program developed in the Netherlands that deletes that concerned citizen's profiles from all social networks—Facebook, Twitter, Myspace, LinkedIn, and so on. Alas, this is another eternally-plaguing caveat of looking at the fine print. Reporter Paula Hane conveys that though social network profiles are deleted, specifically the private content and friend relationships, the aptly named Web 2.0 Suicide Machine does not totally delete accounts because that information is apparently still stored in Facebook's backup servers. This is a greater case for concern over one's digital footprint and supports the growing adage that once something is put into cyber space it will *always* be there in some form.

Twitter

In a humanitarian push, Twitter has recently donated its entire tweet database—encompassing all tweets from 2006 to the present—to the Library of Congress “as a primary source archive.”⁴² The action itself is fascinating paired with our modern sociology that echoes the shift from printed to digital text, but before getting whipped into theoretical postulations of culture and so forth one might consider the concept of permission for Twitter to do this. Did those Twitter users consent to their tweets becoming primary source material in the Library of Congress? Is it even a question worth considering if the intentions are nobler for record keeping and posterity, not disputable for means of selling information and advertising (i.e. Google, Microsoft, and Facebook)?

Twitter seems to be in a category all its own despite it serving many of the same social functions of Facebook; it is a repository of everyday thoughts and actions where discretion is usually wanting. Due to the nature of Twitter being a play-by-play of every thought for every day, and that tweets may now be ubiquitously searched [and used?], it is set apart from Facebook in the sense reporter Paula Hanes dubs the lack of “security by obscurity”⁴³. Unlike Facebook, though much perhaps can be debated about this, Twitter does not have a privacy setting; it is an open playing field where anyone can follow anyone else and have unprecedented access to everything. Why, then, should Twitter be excused or immune from targeted sales if it is equally used from biography to stalking? It seems contradictory in bequeathing tweets onto the Library of Congress when in June 2010 “Twitter settled claims that it failed to protect consumers’ personal information, which led to hackers obtaining unauthorized administrative control of Twitter including access to non-public user information, private tweets, and the ability to send out phony tweets from any account.”⁴⁴ Twitter, too, may be selling those tweets in addition to donating them, and it has even been reported that “the database may be subpoenaed for legal discovery or even criminal cases.”⁴⁵

Analogous to the other technologies discussed, the balance and debate is one of connection versus private life. Are we so invested in the need to showcase our lives down to the minute, banal details of what was eaten for breakfast and how one felt about that that we, as a collective, are willing to sacrifice some, or potentially all, of our privacy to those sites that allow us to feed our lime-light seeking desires and fantasies? By doing so, we are saying that this is more important, so do what you want with my information to insure financially that I can continue to upload my life to this site. Can we truly then bring these companies to court for selling, gather, using, analyzing our private information? It all begs the question of how close we are to the

Orwellian state. Can we avoid it? What fate will we write for ourselves? How much more will we sacrifice for convenience and for what George Carlin blasts as the “illusion of safety?”⁴⁶

Classroom Activities

Overview

Though there are many possibilities with *Nineteen Eighty-Four*, included are activities that could easily be incorporated into the beginning, middle, and end of the unit.

Reading Guide for Nineteen Eighty-Four

Reading guides serve much the same purpose as a tour guide might in a foreign country or in a museum; yes, one could find their way and eventually learn the ins and outs of a country or museum, but a guide can make that process easier and more enlightening for a first-timer. With that in mind, reading guides would be beneficial for difficult passages as a guide asks that students focus on the specific passage given, but they can also be used at the beginning of the work to help orient the student. Reading guides come with a host of benefits can be used in a myriad of valuable permutations. According to educational scholars Michael McKenna and Richard Robinson, reading guides can help students, “make the reading process active rather than passive; [...] *translate* the material into their own words, phrases, and sentences; [...] integrate reading and writing; [...] produce a useful tool for review; and provides [...] a valuable aid for discussion; [...]” McKenna and Robinson also cite research that shows the documented effectiveness of reading guides as an aid to improving reading comprehension, which can be advantageous for struggling and strong readers alike.⁴⁷ The following, then, is a reading guide for the beginning five pages of the novel that can be used as an extended thinking activity after the teacher has introduced the novel, talked about George Orwell, initiated discussion about technology and privacy, and so on.

Nineteen Eighty-Four Reading Guide

Section I

(from part I, chapter 1)

It was a bright cold day in April, and the clocks were striking thirteen. Winston Smith, his chin nuzzled into his breast in an effort to escape the vile wind, slipped quickly through the glass doors of Victory Mansions, though not quickly enough to prevent a swirl of gritty dust from entering along with him.

The hallway smelt of boiled cabbage and old rag mats. At one end of it a coloured poster, too large for indoor display, had been tacked to the wall. It depicted simply an enormous face, more than a metre wide: the face of a man of about forty-five, with a heavy black moustache and ruggedly handsome features. Winston made for the stairs. It was no use trying the lift. Even at the best of times it was seldom working, and at present the electric current was cut off during daylight hours. It was part of the economy drive in preparation for Hate Week. The flat was seven flights up, and Winston, who was thirty-nine and had a varicose ulcer above his right ankle, went slowly, resting several times on the way. On each landing, opposite the lift-shaft, the

poster with the enormous face gazed from the wall. It was one of those pictures which are so contrived that the eyes follow you about when you move. BIG BROTHER IS WATCHING YOU, the caption beneath it ran.

Inside the flat a fruity voice was reading out a list of figures which had something to do with the production of pig-iron. The voice came from an oblong metal plaque like a dulled mirror which formed part of the surface of the right-hand wall. Winston turned a switch and the voice sank somewhat, though the words were still distinguishable. The instrument (the telescreen, it was called) could be dimmed, but there was no way of shutting it off completely. He moved over to the window: a smallish, frail figure, the meagreness of his body merely emphasized by the blue overalls which were the uniform of the party. His hair was very fair, his face naturally sanguine, his skin roughened by coarse soap and blunt razor blades and the cold of the winter that had just ended.

Outside, even through the shut window-pane, the world looked cold. Down in the street little eddies of wind were whirling dust and torn paper into spirals, and though the sun was shining and the sky a harsh blue, there seemed to be no colour in anything, except the posters that were plastered everywhere. The blackmoustachio'd face gazed down from every commanding corner. There was one on the house-front immediately opposite. BIG BROTHER IS WATCHING YOU, the caption said, while the dark eyes looked deep into Winston's own.

Section I Reading Guide

1. What is the name of the building where Winston Smith lives? _____

What words and tones come to your head when you hear the name of the building?

"Victory"	"mansions"

2. Consider how Victory Mansions is described as Winston returns home. How is it described?

List of descriptive words and observations

3. Given the words and tones you highlighted in question 1 and the descriptions offered by the text that you found for question 2, you might be thinking right now that they seem to be a bit contradictory. What was Orwell thinking to confuse you like that?! Try to figure that in writing on the lines below:

4. As Winston trudges upstairs to his apartment, he notices one of the many giant posters that litter the walls of Victory Mansions. Given the descriptions, draw a quick sketch of what the poster might look like (if you are doing this for homework, feel free to print out a picture of a person that might fit the description).

Section II

(from part I, chapter 1)

Winston kept his back turned to the telescreen. It was safer, though, as he well knew, even a back can be revealing. A kilometre away the Ministry of Truth, his place of work, towered vast and white above the grimy landscape. This, he thought with a sort of vague distaste -- this was London, chief city of Airstrip One, itself the third most populous of the provinces of Oceania. He tried to squeeze out some childhood memory that should tell him whether London had always been quite like this. Were there always these vistas of rotting nineteenth-century houses, their sides shored up with baulks of timber, their windows patched with cardboard and their roofs with corrugated iron, their crazy garden walls sagging in all directions? And the bombed sites where the plaster dust swirled in the air and the willow-herb straggled over the heaps of rubble; and the places where the bombs had cleared a larger patch and there had sprung up sordid colonies of wooden dwellings like chicken-houses? But it was no use, he could not remember: nothing remained of his childhood except a series of bright-lit tableaux occurring against no background and mostly unintelligible.

The Ministry of Truth -- Minitrue, in Newspeak* -- was startlingly different from any other object in sight. It was an enormous pyramidal structure of glittering white concrete, soaring up, terrace after terrace, 300 metres into the air. From where Winston stood it was just possible to read, picked out on its white face in elegant lettering, the three slogans of the Party:

WAR IS PEACE
FREEDOM IS SLAVERY
IGNORANCE IS STRENGTH

The Ministry of Truth contained, it was said, three thousand rooms above ground level, and corresponding ramifications below. Scattered about London there were just three other buildings of similar appearance and size. So completely did they dwarf the surrounding architecture that from the roof of Victory Mansions you could see all four of them simultaneously. They were the homes of the four Ministries between which the entire apparatus of government was divided. The Ministry of Truth, which concerned itself with news, entertainment, education, and the fine arts. The Ministry of Peace, which concerned itself with war. The Ministry of Love, which maintained law and order. And the Ministry of Plenty, which was responsible for economic affairs. Their names, in Newspeak: Minitrue, Minipax, Miniluv, and Miniplenty.

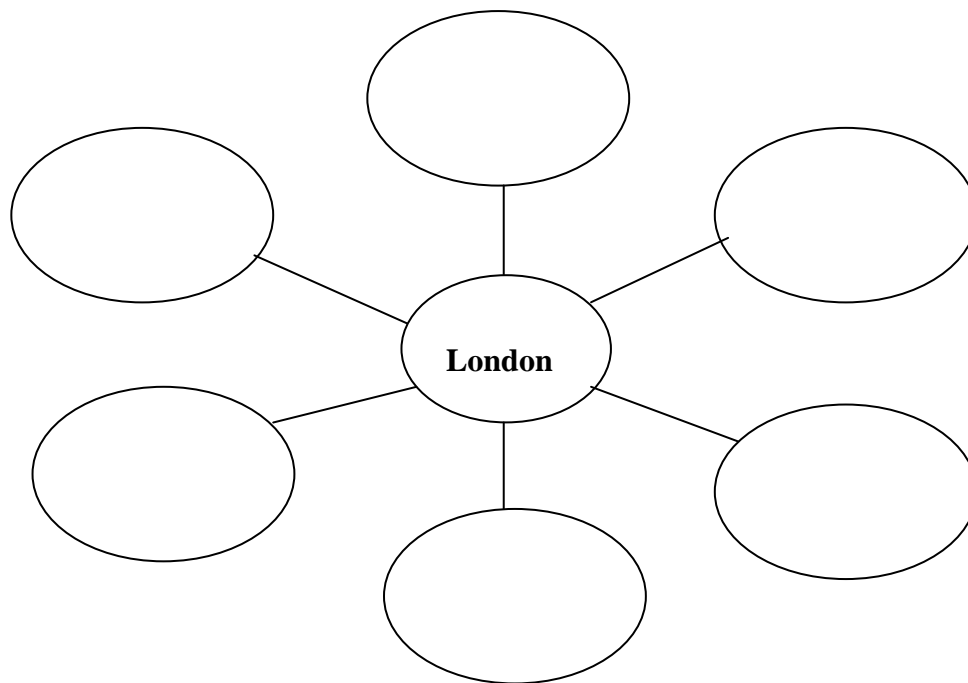
The Ministry of Love was the really frightening one. There were no windows in it at all. Winston had never been inside the Ministry of Love, nor within half a kilometre of it. It was a

place impossible to enter except on official business, and then only by penetrating through a maze of barbed-wire entanglements, steel doors, and hidden machine-gun nests. Even the streets leading up to its outer barriers were roamed by gorilla-faced guards in black uniforms, armed with jointed truncheons.

Section II Reading Guide

1. What the heck is a telescreen?! And why do you think Winston is so keen to not be in view of it? (hint: think about the posters from Section I)

2. How does Winston describe London?



3. Hhhhhmmmmmm...those Party slogans sound kind of weird. Where else have you heard some contradictory statements in this novel? How do you think those slogans could logically make sense? Try to reason it out!

“War is Peace” ----->

“Freedom is Slavery” ----->

“Ignorance is Strength” ----->

4. What are the different ministries and what do they do?

Ministry	Newspeak name for Ministry	What the Ministries are in charge of

5. Winston gives two names for the Ministries, one name is in “Newspeak.” Based on what you observe, what do you think Newspeak is?

6. In the Party slogans and the ministries you have probably noticed by now that there is more contradiction in this novel like what you saw with the name of Winston’s apartment? Look back at your original prediction. With this new information, how can you tweak or further explain your prediction? Any new connection or thoughts?

Section III

(from part I, chapter 1)

For some reason the telescreen in the living-room was in an unusual position. Instead of being placed, as was normal, in the end wall, where it could command the whole room, it was in the longer wall, opposite the window. To one side of it there was a shallow alcove in which Winston was now sitting, and which, when the flats were built, had probably been intended to hold bookshelves. By sitting in the alcove, and keeping well back, Winston was able to remain outside the range of the telescreen, so far as sight went. He could be heard, of course, but so long as he stayed in his present position he could not be seen. It was partly the unusual geography of the room that had suggested to him the thing that he was now about to do.

But it had also been suggested by the book that he had just taken out of the drawer. It was a peculiarly beautiful book. Its smooth creamy paper, a little yellowed by age, was of a kind that had not been manufactured for at least forty years past. He could guess, however, that the book was much older than that. He had seen it lying in the window of a frowsy little junk-shop in a slummy quarter of the town (just what quarter he did not now remember) and had been stricken immediately by an overwhelming desire to possess it. Party members were supposed not to go into ordinary shops ('dealing on the free market', it was called), but the rule was not strictly kept, because there were various things, such as shoelaces and razor blades, which it was impossible to get hold of in any other way. He had given a quick glance up and down the street and then had

slipped inside and bought the book for two dollars fifty. At the time he was not conscious of wanting it for any particular purpose. He had carried it guiltily home in his briefcase. Even with nothing written in it, it was a compromising possession.

The thing that he was about to do was to open a diary. This was not illegal (nothing was illegal, since there were no longer any laws), but if detected it was reasonably certain that it would be punished by death, or at least by twenty-five years in a forced-labour camp. Winston fitted a nib into the penholder and sucked it to get the grease off. The pen was an archaic instrument, seldom used even for signatures, and he had procured one, furtively and with some difficulty, simply because of a feeling that the beautiful creamy paper deserved to be written on with a real nib instead of being scratched with an ink-pencil. Actually he was not used to writing by hand. Apart from very short notes, it was usual to dictate everything into the speak-write which was of course impossible for his present purpose. He dipped the pen into the ink and then faltered for just a second. A tremor had gone through his bowels. To mark the paper was the decisive act. In small clumsy letters he wrote:

April 4th, 1984.

He sat back. A sense of complete helplessness had descended upon him. To begin with, he did not know with any certainty that this was 1984. It must be round about that date, since he was fairly sure that his age was thirty-nine, and he believed that he had been born in 1944 or 1945; but it was never possible nowadays to pin down any date within a year or two.

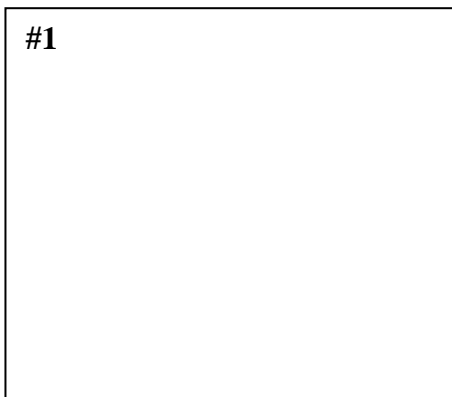
Section III Reading Guide

1. Think about how Winston reacts to his telescreen. What is your reaction to that? Why might Winston be so concerned with how he looks?

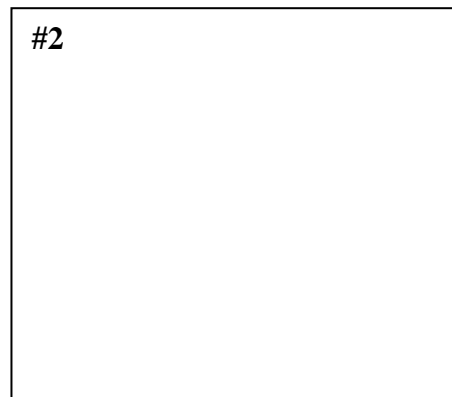
2. What is different about Winston's home and telescreen?

3. What convinces Winston to do the thing he is about to do?

#1

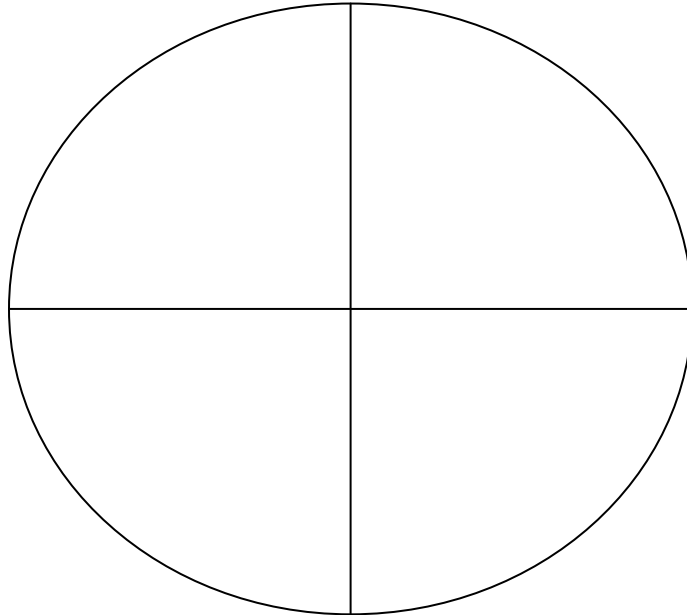


#2



4. What could happen to Winston if he is caught?

5. If that's the way this society is, why do you think he is doing it?! Jot down one possibility per section.



6. What do you think Winston's handwriting looked like? Imagine it and sketch out below the first thing Winston writes (remember how Winston described writing with a pen!).

A large, empty rectangular box with a thin black border, intended for students to sketch the first thing Winston writes in his handwriting.

Excerpt for Analysis and Writing Practice

Much like the reading guides, extracting key excerpts throughout *Nineteen Eighty-Four* lend themselves well to encouraging focused discussion; providing “check-in” points with assigned readings to make sure students are comprehending the various themes and their interactions; and may also function as prompts to discuss, practice, and improve writing. With the excerpt below, not only do the teacher and students want to focus on the symbolic qualities of the free-nature of the prole woman singing juxtaposed to the harsh control of Winston and Julia's reality, but this can also be used as or with a prompt for writing about closer literary analysis. This outline is more appropriate for an introduction/ practice on using outlines in writing or for an in-class writing assignment, but length can be added by the teacher to turn the assignment into a literary analysis paper.

Nineteen Eighty-Four Excerpt from Part II, Chapter X

As he fastened the belt of his overalls he strolled across to the window. The sun must have gone down behind the houses; it was not shining into the yard any longer. The flagstones were wet as though they had just been washed, and he had the feeling that the sky had been washed too, so fresh and pale was the blue between the chimney pots. Tirelessly the woman marched to and fro, corking and uncorking herself, singing and falling silent, and pegging out more diapers, and more and yet more. He wondered whether she took in washing for a living, or was merely the slave of twenty or thirty grandchildren. Julia had come across to his side; together they gazed down with a sort of fascination at the sturdy figure below. As he looked at the woman in her characteristic attitude, her thick arms reaching up for the line, her powerful marelike buttocks protruded, it struck him for the first time that she was beautiful. It had never before occurred to him that the body of a woman of fifty, blown up to monstrous dimensions by childbearing, then hardened, roughened by work till it was coarse in the grain like an overripe turnip, could be beautiful. But it was so, and after all, he thought, why not? The solid, contourless body, like a block of granite, and the rasping red skin, bore the same relation to the body of a girl as the rose-hip to the rose.

“She’s beautiful,” he murmured.

“She’s a meter across the hips, easily,” said Julia.

“That is her style of beauty,” said Winston.

He held Julia’s supple waist easily encircled by his arm. From the hip to the knee her flank was against his. Out of their bodies no child would ever come. That was the one thing they could never do. Only by word of mouth, from mind to mind, could they pass on the secret. The woman down there had no mind, she had only strong arms, a warm heart, and a fertile belly. He wondered how many children she had given birth to. It might easily be fifteen. She had her momentary flowering, a year, perhaps, of wildrose beauty, and then she had suddenly swollen like a fertilized fruit and grown hard and red and coarse, and then her life had been laundering, scrubbing darning, cooking, sweeping, polishing, mending, scrubbing, laundering, first for children, then for grandchildren, over thirty unbroken years. At the end of it she was still singing....

“Do you remember,” [Winston] said, “the thrush that sang to us, that first day, at the edge of the wood?”

“He wasn’t singing to us,” said Julia. “He was singing to please himself. Not even that. He was just singing.”

Outline Structure for Nineteen Eighty-Four Excerpt

I. Intro

a. thesis

II. First Body Paragraph

a. Quote/specific textual support #1

b. Explanation of quote and why it connects

c. Quote/specific textual support #2

d. Explanation

e. Transition—how does this paragraph connect to the next paragraph?

III. Second Body Paragraph

- a. Quote/specific textual support #1
 - b. Explanation of quote and why it connects
 - c. Quote/specific textual support #2
 - d. Explanation
 - e. Transition—how does this paragraph connect to the next paragraph?
- IV. Conclusion
- a. Summarize main points

Research/Creative Project

The vast, turbulent history of the early twentieth century was globally inescapable; the terror, destruction of wars, and civil and political unrest perceptibly bleed through *Nineteen Eighty-Four*. Not only does this present distinguishable moments of analysis, it also affords a backdrop for culminating research papers and projects. The suggested project below combines the academic with the creative asking students to understand the world Orwell was living while simultaneously creating that world for them and their classmates to experience firsthand.

The Socialist Empire Strikes Back

Objective:

As we explore the political and social implications interpreted and predicted in George Orwell's *Nineteen Eighty-Four*, it will be your task to create your own form of socialist or dictatorial government system to better understand the world events in Orwell's life, as well as the social fears of the day. Your group will be assigned a **governmental model to research, report on, and use as a template for the rules and punishments you will enforce and enact during your presentation**. Make sure you detail everything you do because you must be able to enact all of your policies to control the class/your subjects. All research must be properly cited in **APA format!**

Your Researched Government:

It will be your job to assign roles and tasks within your group. First, you must decide research duties—who will research your assigned government's:

- rules and punishments for breaking those rules
- geographic and cultural information
- leader's biography
- political implementation (how policies were enacted; how the political party or leader came into power)
- successes and failures
- interaction between government and subjects?

Your Rules and Punishments:

Based on the research you've done, you will create rules that your classmates must follow throughout your presentation and punishments for breaking those rules. You will display these rules and punishments for your classmates and enact them throughout your presentation. Your classmates have been asked to "play along." When your group is chosen to be the acting government, it is your duty to clearly establish and implement the rules, policies, and

punishments you've set up in your government charter. You may use the board or display paper to write up a list of rules for your subjects. Make sure they know the consequences of their actions—you don't want a revolt on your hands!

Brainstorm the possible list of behaviors that your classmates may display: talking out of turn, writing or passing notes to their friends, getting up to throw something away, doing homework for another class, putting heads down on desks...etc.

If You are a Subject:

It is your duty to function under the new governmental system in place, but what if you don't agree with your government? Is a revolt possible? How would you organize? What are you willing to risk?

Sample Government Rules/Punishments & Reflections:

Rule	Punishment
Talking without permission	Imprisonment.

Curriculum Unit Title

Becoming Critical Consumers of Our Freedoms: Technology and the Persistence of *Nineteen Eighty-Four*

Author

Amanda Wlock

KEY LEARNING, ENDURING UNDERSTANDING, ETC.

Writers use narrative elements to develop and structure texts to convey purpose and meaning.

ESSENTIAL QUESTION(S) for the UNIT

How can a reader interpret and analyze the elements of long fiction in order to develop a meaningful response?

CONCEPT A

CONCEPT B

CONCEPT C

Theme

Characterization

Narrative Theme Structure

ESSENTIAL QUESTIONS A

ESSENTIAL QUESTIONS B

ESSENTIAL QUESTIONS C

- How do authors effectively develop theme? (R.L. 2)
- How can I analyze the development and interaction of two or more themes over the course of a text? (R.L. 2)
- How can the use of themes provide an objective summary of the text? (R.L. 2)

- What is the effect of characters' introductions in a text? (R.L. 3)
- How do characters evolve over the course of the text? (R.L. 3)

- How do authors structure texts in order to make sections of the text relate to each other and the whole text? (R.L. 5)

VOCABULARY A

VOCABULARY B

VOCABULARY C

-dystopia

ADDITIONAL INFORMATION/MATERIAL/TEXT/FILM/RESOURCES

Fahrenheit 451; *V for Vendetta*; *The Handmaid's Tale*; *Brave New World*; *The Hunger Games: The Giver*; "Harrison Bergeron"

Notes

¹ <http://www.schoolmap.org/School/Appoquinimink-High-School/>

² Ibid.

³ http://www.publicschoolreview.com/school_ov/school_id/131408

⁴ <http://www.k12guides.com/school/Appoquinimink-High-School:100008000225.html>

⁵ John Grafton, ed., *The Declaration of Independence and Other Great Documents of American History, 1775-1865* (New York: Dover Thrift Editions, 2000), 25.

⁶ Ibid.

⁷ Peter K. Manning, "Review Essay: Surveillance and Democracy," review of *Surveillance and Democracy*, by Kevin D. Haggerty and Minas Samatas, eds, Routledge-Cavendish, 2010, and *Surveillance, Privacy, and the Globalization of Personal Information: International Comparisons*, by Elia Zureik, L. Lynda Harding, Stalker, Emily Smith, David Lyon, and Yolanda Chan, eds, McGill-Queen's University Press, 2010, 242.

⁸ Christopher H. Pyle, "The Invasion of Privacy," *The Academy of Political Science* 34 (1982): 131, accessed November 5, 2012, <http://www.jstor.org/stable/3700975>.

⁹ Christopher Loeffler, "Privacy Issues in Social Media," *IP Litigator* September/October (2012): 12.

¹⁰ *Katz v. the United States*. http://www.law.cornell.edu/supct/html/historics/USSC_CR_0389_0347_ZS.html

¹¹ "Security and Surveillance: EPCA," Center for Democracy and Technology, accessed November 10, 2012, <https://www.cdt.org/issue/wiretap-epca>.

¹² Robert McHale, esq, and Eric Garulay, *Navigating Social Media Risks: Safeguarding Your Business* (Indianapolis: Que, 2012), 56.

¹³ Christopher Loeffler, "Privacy Issues in Social Media," *IP Litigator* September/October (2012): 16.

¹⁴ "Security and Surveillance: EPCA," Center for Democracy and Technology, accessed November 10, 2012, <https://www.cdt.org/issue/wiretap-epca>.

¹⁵ Ibid.

¹⁶ Robert McHale, esq, and Eric Garulay, *Navigating Social Media Risks: Safeguarding Your Business* (Indianapolis: Que, 2012), 137.

¹⁷ "Daily Report: Tech and Media Companies Resist Proposal to Strengthen Online Privacy Protections for Children," *The New York Times*, November 6, 2012, accessed November 7, 2012, <http://bits.blogs.nytimes.com/2012/11/06/daily-report-tech-and-media-companies-resist-proposal-to-strengthen-online-privacy-protections-for-children/>.

¹⁸ "Financial Crimes Enforcement Network," United States Department of the Treasury, accessed November 10, 2012, http://www.fincen.gov/statutes_regs/patriot/.

¹⁹ Peter K. Manning, "Review Essay: Surveillance and Democracy," review of *Surveillance and Democracy*, by Kevin D. Haggerty and Minas Samatas, eds, Routledge-Cavendish, 2010, and *Surveillance, Privacy, and the Globalization of Personal Information: International Comparisons*, by Elia Zureik, L. Lynda Harding, Stalker, Emily Smith, David Lyon, and Yolanda Chan, eds, McGill-Queen's University Press, 2010, 241.

²⁰ Ibid, 243.

²¹ David Streitfeld and Kevin J. O'Brien, "Google Privacy Inquiries Get Little Cooperation," *The New York Times* (May 22, 2012), accessed November 7, 2012, <http://www.nytimes.com/2012/05/23/technology/google-privacy-inquiries-get-little-cooperation.html?pagewanted=all>.

²² Josh Smith, "Google's Sly-Fi Network," *National Journal* (May 3, 2012), accessed November 5, 2012, GALE|A295942419.

²³ David Streitfeld and Kevin J. O'Brien, "Google Privacy Inquiries Get Little Cooperation," *The New York Times* (May 22, 2012), accessed November 7, 2012, <http://www.nytimes.com/2012/05/23/technology/google-privacy-inquiries-get-little-cooperation.html?pagewanted=all>.

²⁴ Ibid.

²⁵ Ibid.

²⁶ Ibid.

²⁷ Christopher Loeffler, "Privacy Issues in Social Media," *IP Litigator* September/October (2012): 15.

²⁸ "Watchdogs Criticize New Google Privacy Policy," *Information Management* May/June (2012): 7.

²⁹ Claire Cain Miller, "Larry Page defends Google's Privacy Policy," *NYTimes.com* (October 17, 2012), accessed November 7, 2012, <http://bits.blogs.nytimes.com/2012/10/17/larry-page-defends-googles-privacy-policy/>.

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- ³⁰ Eric Pfannier and Kevin J. O'Brien, "Europe Presses Google to Change Privacy Policy," *The New York Times* (October 16, 2012), accessed November 7, 2012, <http://www.nytimes.com/2012/10/17/business/global/17iht-google17.html?pagewanted=all>.
- ³¹ Ibid.
- ³² Claire Cain Miller, "F.T.C. Fines Google \$22.5 Million for Safari Privacy Violations," *NYTimes.com* (August 9, 2012), accessed November 7, 2012, <http://bits.blogs.nytimes.com/2012/08/09/f-t-c-fines-google-22-5-million-for-safari-privacy-violations/>.
- ³³ David Streitfeld and Kevin J. O'Brien, "Google Privacy Inquiries Get Little Cooperation," *The New York Times* (May 22, 2012), accessed November 7, 2012, <http://www.nytimes.com/2012/05/23/technology/google-privacy-inquiries-get-little-cooperation.html?pagewanted=all>.
- ³⁴ Ibid.
- ³⁵ Eric Pfannier and Kevin J. O'Brien, "Europe Presses Google to Change Privacy Policy," *The New York Times* (October 16, 2012), accessed November 7, 2012, <http://www.nytimes.com/2012/10/17/business/global/17iht-google17.html?pagewanted=all>.
- ³⁶ Claire Cain Miller, "Larry Page defends Google's Privacy Policy," *NYTimes.com* (October 17, 2012), accessed November 7, 2012, <http://bits.blogs.nytimes.com/2012/10/17/larry-page-defends-googles-privacy-policy/>.
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- ³⁸ Edward Wyatt and Nick Wingfield, "As Microsoft Shifts Its Privacy Rules, an Uproar is Absent," *The New York Times* (October 19, 2012), accessed November 7, 2012, <http://www.nytimes.com/2012/10/20/technology/microsoft-expands-gathering-and-use-of-data-from-web-products.html?pagewanted=all>.
- ³⁹ Ibid.
- ⁴⁰ Ibid.
- ⁴¹ Christopher Loeffler, "Privacy Issues in Social Media," *IP Litigator* September/October (2012): 15-16.
- ⁴² Paula J. Hane, "Sticky Privacy Issues, the iPad Launch, and Code Scanning," *Information Today* (June 2010): 10.
- ⁴³ Ibid.
- ⁴⁴ Christopher Loeffler, "Privacy Issues in Social Media," *IP Litigator* September/October (2012): 15.
- ⁴⁵ Paula J. Hane, "Sticky Privacy Issues, the iPad Launch, and Code Scanning," *Information Today* (June 2010): 11.
- ⁴⁶ George Carlin, *You Are All Diseased*, HBO Live (New York: Beacon Theater), recorded February 6, 1999.
- ⁴⁷ Michael C McKenna and Richard Robinson, *Teaching Through Text: Reading and Writing in the Content Areas* (Pearson Education Inc, 2009), 118-119.

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