

June 24, 2025

The Honorable Rob Bonta  
Attorney General of California, California Department of Justice  
1300 I Street  
Sacramento, CA 95814  
rob.bonta@doj.ca.gov

Michael S. Macko  
Deputy Director of Enforcement, California Privacy Protection Agency  
2101 Arena Boulevard  
Sacramento, CA 95834  
michael.macko@cpha.ca.gov

**Re: Analysis Report of Data Broker Registration Gaps**

Dear Attorney General Bonta and Deputy Director Macko:

We are Privacy Rights Clearinghouse, a San Diego-based consumer privacy advocacy and education organization, and the Electronic Frontier Foundation, a San Francisco-based nonprofit organization defending civil liberties in the digital world, writing to bring to your attention an important matter of consumer privacy and regulatory compliance concerning California's data broker registration requirements.

**Our comprehensive analysis has uncovered a troubling pattern, identifying 291 data brokers that apparently have either not registered or re-registered with the California Privacy Protection Agency's (CPPA) registry despite having registered in other states.**

The attached report identifies self-identified data brokers that are operating in other jurisdictions—as evidenced by their registration in states like Vermont, Texas, and Oregon—or that have previously registered in California, yet did not appear on the California's CPPA registry at the time of data collection. More investigation by the state is needed since data broker requirements vary from state to state. But these findings could indicate a systematic failure of compliance in California, potentially undermining the transparency goals at the heart of the state's privacy framework.

We believe that a wider investigation and targeted enforcement actions against any non-compliant data brokers would send a powerful signal to the industry about California's commitment to privacy enforcement.

**Key Findings**

Our analysis of state data broker registries has yielded the following key findings:

- Total unique data broker entities identified across all registries: 750
- Data brokers registered in Vermont (current or expired): 441
- Data brokers registered in Texas: 226
- Data brokers registered in Oregon: 275
- Data brokers registered in California Attorney General registry (legacy): 493
- Data brokers registered in California CPPA registry (current): 459
- **Data brokers found in other registries but not in California CPPA registry: 291**

These findings highlight a significant gap in California's data broker registration system. Many companies that acknowledge their data broker status in other states by registering are not registering in California.

## Methodology

Our analysis involved several key steps:

1. **Data Collection:** We scraped data broker registries from California (from the now depreciated though still available Office of the Attorney General for the years 2020-2023 and the current California registry for 2025 maintained by the California Privacy Protection Agency), Vermont (containing current and historical registrations going back to 2019), Texas (containing current 2025 registrations), and Oregon (containing current registration). We collected these registries from April 4th until the 8th, 2025.
2. **Data Normalization:** We standardized the data fields across all registries to ensure consistency.
3. **Broker Identification & Matching:** We used a matching algorithm to identify the same brokers across different registries. Our algorithm was based on comparing the business names as well as the email and web domains. After getting a final list, we manually checked each name on the list below.

California's definition of a data broker under the CPRA is similar to definitions used in other states. Our analysis is based on a straightforward premise: data brokers that self-identify as such by registering in other states—or those who registered in any state in previous years—may have obligations to register in California if they meet the statutory definition of a data broker under California law.

Each company on our list meets two simple criteria:

1. It has self-identified as a data broker by currently or previously registering in at least one state, including previously registration in California.
2. It did not appear on the California's CPPA registry at the time of data collection.

## CA Enforcement Information

California Civil Code § 1798.99.80 et seq. requires data brokers to register with the state and pay an annual fee. As amended by the Delete Act (SB 362), registration is now managed by the California Privacy Protection Agency (CPPA).

Enforcement authority currently resides with the CCPA:

- The CPPA may bring administrative actions against data brokers for failing to register (§ 1798.99.82(c)).
- Civil penalties are significant: \$200 for each day the data broker fails to register (§ 1798.99.82(c)(1)).

The January 2026 deadline established in the Delete Act for the launch of the accessible deletion mechanism has increased the urgency of enforcement, as unregistered data brokers may not be captured in the upcoming deletion mechanism infrastructure.

Monetary penalties from enforcement actions can be substantial: as noncompliance of a single data broker for a year (365 days) can add up to \$73,000.

Beyond the financial impact, enforcement actions would significantly enhance transparency in the data broker ecosystem and strengthen California's privacy framework. California has already made good progress on enforcement, bringing at least seven actions against companies for noncompliance.<sup>1</sup>

## CA Law Relative to Other States

Four states have separate data broker registration laws. While their registration requirements are similar, in some cases, a data broker may be subject to registration in one state while not being required to register in another. Or a company that at one time met the definition of a data broker could later change its business, removing its registration obligations.

When comparing state registries, small differences in the laws could lead companies registering in one state to have legitimate reasons for not registering in another. For example:

- California, Texas, and Oregon exclude entities covered by the Fair Credit Reporting Act (FCRA), while Vermont does not.
- California, Texas and Oregon exclude entities covered by the Gramm-Leach-Bliley Act (GLBA), while Vermont does not.
- California and Vermont exclude some insurers, while Texas and Oregon do not.

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<sup>1</sup> <https://cppa.ca.gov/announcements/2025/20250227.html>.

- California excludes entities that satisfy three thresholds: gross revenue is less than \$25m annually, headcount is less than 100,000 California consumers annually, and revenue fraction from selling California consumers' data is less than 50%. Texas shares the same revenue fraction threshold but has a lower headcount threshold (50,000 Texas consumers). Oregon and Vermont do not have any minimum thresholds.
- California and Vermont, require businesses to “knowingly” collect and sell data, while Texas and Oregon do not. Moreover, the definition of data broker in Texas does not explicitly require the “sale” of data.
- Texas excludes certain nonprofits that assist missing and exploited children, while California, Oregon, and Vermont do not.
- Texas periodically removes expired registrations, which may cause discrepancies between the data presented here (collected April 4–8, 2025) and the state's current registry. Vermont explicitly marks expired registrations, while California and Oregon retain all registrations publicly.

## Conclusion

The findings in this report highlight a significant number of data brokers who are not registering in California, despite registering in other states. While the transparency objectives of the CPRA and Delete Act represent important advances for consumer privacy, their effectiveness ultimately depends on rigorous enforcement.

Your offices have consistently demonstrated leadership in privacy protection through strategic enforcement actions that strengthen compliance across entire industries. The data broker ecosystem particularly benefits from such an approach, as it remains opaque to most consumers despite handling vast quantities of sensitive personal information.

Our organizations stand ready to provide any additional information, technical assistance, or follow-up research that might assist in pursuing any investigation. We would welcome the chance to discuss our findings in greater detail.

Thank you for your consideration of this important privacy enforcement issue.

Respectfully submitted,

Emory Roane  
Associate Director of Policy  
Privacy Rights Clearinghouse

Mario Trujillo  
Staff Attorney  
Hayley Tsukayama  
Associate Director of Legislative Activism  
Electronic Frontier Foundation

## Appendix A: Data Brokers Not Found in California CPPA Registry

We have identified 291 data brokers that have registered in other states or have registered with the California Office of the Attorney General in the past but did not appear on the California CPPA registry at the time of data collection. These companies are listed below, along with the states where they have acknowledged their data broker status.

Superscript markers: \* = collects geolocation data; ‡ = collects minors' data.

No.	Data Broker	Present in Registries (aliases/DBAs)
1	180 By Two, LLC*	Vermont (as 180 By Two, LLC)
2	4Legalleads*‡	Vermont (as 4Legalleads; Advertise4Sales Inc; Advertise4Sales LLC); Oregon (as 4Legalleads; ADVERTISE4SALES Inc)
3	700 Credit, LLC*‡	Vermont (as 700 Credit, LLC; Open Dealer Exchange, LLC)
4	Accenture LLP*‡	California AG (legacy) (as Accenture LLP); Vermont (as Accenture LLP)
5	ACE Agents Inc.*‡	California AG (legacy) (as ACE Agents Inc.)
6	ACRONYMIX LLC*‡	Vermont (as Acronymix LLC); Oregon (as ACRONYMIX LLC)
7	Active Intel Investigations LLC*‡	Vermont (as Active Intel Investigations LLC)
8	ACTIVIMPACT LLC*‡	Vermont (as Activimpact, LLC); Texas (as Activimpact, LLC); Oregon (as ACTIVIMPACT LLC; Activimpact)
9	Acuant, Inc.*‡	California AG (legacy) (as Acuant, Inc.; Idology, Inc.)
10	ACUTRAQ Background Screening, Inc.*	Vermont (as ACUTRAQ Background Screening, Inc.)
11	Adadapted Inc.*	California AG (legacy) (as Adadapted Inc.); Vermont (as Adadapted Inc.)
12	Ad Direct Inc*‡	California AG (legacy) (as Ad Direct Inc)
13	Adrea Rubin Marketing, Inc.*‡	California AG (legacy) (as Adrea Rubin Marketing, Inc.; Adrea Rubin Media, Inc.; Calibrant Digital); Vermont (as Adrea Rubin Marketing, Inc.; Adrea Rubin Media, Inc.; Calibrant Digital)
14	Advantage Credit, Inc.*	Vermont (as Advantage Credit, Inc.)
15	Advantage Sales & Marketing LLC*	Vermont (as Advantage Sales & Marketing LLC)
16	AIS Infosource LP*	Vermont (as AIS Infosource LP; AIS Portfolio Services LLC; AIS Recovery Solutions, LLC)

17	All Global Resources, LLC*	California AG (legacy) (as All Global Resources, LLC); Vermont (as All Global Resources, LLC)
18	Alloy*	Vermont (as Alloy)
19	Altisource Holdings, LLC*‡	Vermont (as Altisource Holdings, LLC)
20	Amerilist Inc*	Vermont (as Amerilist Inc)
21	Amrent, Inc.*‡	Vermont (as Amrent, Inc.; Automation Research, Inc.; Cbcinnovis, Inc.; Dataverify; FD Holdings, LLC; Factual Data; Factual Data, Inc.)
22	Anexinet Corp.	California AG (legacy) (as Anexinet Corp.)
23	Apihub, Inc*‡	California AG (legacy) (as Apihub, Inc.); Vermont (as Apihub, Inc; Apihub, Inc.; Clearbit)
24	Arity 875, LLC*‡	California AG (legacy) (as Arity 875, LLC)
25	Arrakis Technologies Corp.*‡	California AG (legacy) (as Arrakis Technologies Corp.)
26	AMERICAN SPIRIT DATA SOLUTIONS LLC*‡	California AG (legacy) (as Aspire North); Oregon (as AMERICAN SPIRIT DATA SOLUTIONS LLC; American Spirit Data Solutions LLC; Aspire North)
27	Assurance Iq, Inc.*‡	Vermont (as Assurance Iq, Inc.)
28	Atlantic Fox Technologies, Inc.*‡	California AG (legacy) (as Atlantic Fox Technologies, Inc.); Vermont (as Atlantic Fox Technologies, Inc.)
29	ATTOM Data Solutions*	California AG (legacy) (as ATTOM Data Solutions LLC); Vermont (as ATTOM Data Solutions; ATTOM Data Solutions LLC); Texas (as ATTOM Data Solutions LLC); Oregon (as ATTOM Data Solutions; ATTOM Data Solutions LLC)
30	Audiencerate Ltd*‡	California AG (legacy) (as Audiencerate Ltd)
31	Automotive Mastermind*‡	California AG (legacy) (as Automotive Mastermind)
32	Background Information Services, Inc.*‡	Vermont (as Background Information Services, Inc.; Bis)
33	Best Pick Reports, LLC*	Vermont (as Best Pick Reports, LLC)
34	Birchwood Credit Services Inc*	Vermont (as Birchwood Credit Services Inc)
35	Biscred*	Vermont (as Biscred)
36	Bliss Point Media, Inc.*‡	California AG (legacy) (as Bliss Point Media, Inc.)
37	Blue Action*‡	California AG (legacy) (as Blue Action)
38	ALTRATA Inc*‡	California AG (legacy) (as Boardex; Boardroom Insiders, Inc.; Relationship Science; Wealth-X; Wealthengine, Inc.); Vermont (as Boardex; Boardex LLC; Boardroom Insiders; Boardroom Insiders, Inc.; Relationship Science; Wealth-X; Wealthengine;

		Wealthengine, Inc.); Texas (as Boardex LLC; Boardroom Insiders Inc.; Relationship Science; Wealth-X LLC; Wealthengine Inc.); Oregon (as ALTRATA Inc; BOARDEX LLC; BOARDROOM INSIDERS Inc; Relationship Science LLC; THE DEAL LLC; WEALTH-X LLC; WEALTHENGINE Inc)
39	Business Resource Center LLC*	Texas (as Business Resource Center LLC)
40	Bridgevine Inc.*‡	Vermont (as Bridgevine Inc.)
41	Brightswipe Inc.*‡	California AG (legacy) (as Brightswipe Inc); Vermont (as Brighthswipe Inc)
42	BTRS Holdings Inc.*‡	California AG (legacy) (as BTRS Holdings Inc; Billtrust; Factor Systems, LLC)
43	Business.Com*	Vermont (as Business.Com)
44	CARCO Group, Inc.*‡	Vermont (as CARCO Group, Inc.)
45	Careerbuilder Employment Screening, LLC*‡	Vermont (as Careerbuilder Employment Screening, LLC)
46	Catalyze Ai, Inc.*‡	California AG (legacy) (as Catalyze Ai, Inc); Vermont (as Catalyze Ai, Inc)
47	Charles Bennett	Texas (as Charles Bennett)
48	CIC MORTGAGE CREDIT Inc.*‡	Vermont (as CIC MORTGAGE CREDIT Inc.; CIC Mortgage Credit, Inc)
49	Civitech*	Vermont (as Civitech)
50	Collateral Analytics, LLC*	Vermont (as Collateral Analytics, LLC)
51	Command Precision Inc.*‡	California AG (legacy) (as Command Precision Inc.; Persistent.Id); Vermont (as Command Precision, Inc.)
52	Compile, Inc.*‡	California AG (legacy) (as Compile, Inc.)
53	Complementics*‡	California AG (legacy) (as Complementics)
54	Connect Computer LLC*‡	California AG (legacy) (as Connect Computer LLC)
55	Consider, Inc.*‡	California AG (legacy) (as Consider, Inc.)
56	Consolidated Information Services Solutions LLC*‡	Vermont (as Consolidated Information Services Solutions LLC; Universalcis)
57	CONSUMER CANVAS LLC*‡	Texas (as Consumer Canvas, LLC); Oregon (as CONSUMER CANVAS; CONSUMER CANVAS LLC)
58	Contactout*‡	California AG (legacy) (as Contactout)
59	CONTEMPORARY INFORMATION CORP.*‡	Vermont (as CONTEMPORARY INFORMATION CORP.; Contemporary Information Corp)

60	Contentgine Inc.	California AG (legacy) (as Contentgine Inc.)
61	CONVERGE DIRECT LLC*	California AG (legacy) (as Converge Direct, LLC); Vermont (as Converge Direct, LLC.); Texas (as Converge Direct, LLC); Oregon (as CONVERGE DIRECT LLC)
62	Credit Bureau Of Council Bluff*	Vermont (as Credit Bureau Of Council Bluff; Credit Bureau Of Council Bluffs, Inc)
63	Crosswalk Technologies Inc*‡	California AG (legacy) (as Crosswalk Technologies Inc); Vermont (as Crosswalk Technologies Inc)
64	Customer Communications Group, Inc.*‡	California AG (legacy) (as Customer Communications Group, Inc.)
65	Cybba Inc.*‡	California AG (legacy) (as Cybba Inc.); Vermont (as Cybba Inc.)
66	Cyndx Networks LLC	California AG (legacy) (as Cyndx Networks LLC)
67	Databaseusa*‡	California AG (legacy) (as Databaseusa); Vermont (as Databaseusa.Com LLC)
68	Datadirect Marketing Solutions, Inc.	California AG (legacy) (as Datadirect Marketing Solutions, Inc.)
69	Datadojo CDP Inc.*	Texas (as Datadojo CDP Inc.)
70	Data Facts, Inc*‡	Vermont (as Data Facts, Inc; Data Facts, Inc.)
71	Data Management LLC*‡	California AG (legacy) (as Data Management, LLC); Vermont (as Data Management LLC; Data-Mail, Inc.)
72	Data Marketing Solutions, Inc.*‡	California AG (legacy) (as Data Marketing Solutions, Inc.)
73	Datamyx LLC*‡	California AG (legacy) (as Deluxe Corporation); Vermont (as Datamyx LLC; Deluxe Corporation; Deluxe Marketing Solutions); Texas (as Deluxe Financial Services, LLC)
74	Data Plus Content LLC*	Vermont (as Data Plus Content LLC)
75	David Rickenbacher	California AG (legacy) (as David Rickenbacher)
76	Deeptrace Inc.*‡	California AG (legacy) (as Deeptrace Inc.)
77	Digicenter, LLC.*	Vermont (as Digicenter, LLC.)
78	DIGITAL SEGMENT LLC*‡	California AG (legacy) (as Digital Segment, LLC); Vermont (as Digital Segment, LLC); Texas (as Digital Segment, LLC); Oregon (as DIGITAL SEGMENT LLC)
79	Diligent Corporation	California AG (legacy) (as Diligent Corporation)
80	Distribution Processing Center LLC	California AG (legacy) (as Distribution Processing Center LLC)
81	Dmdatabases	California AG (legacy) (as Dmdatabases)
82	Driveniq Corp*‡	California AG (legacy) (as Driveniq Corporation); Vermont (as Driveniq Corp; Driveniq Corporation); Oregon (as Driveniq; Driveniq Corporation)
83	Drobu Media LLC*‡	Vermont (as Drobu Media LLC; Dustin Blackman)

<b>84</b>	Dynata, LLC*‡	California AG (legacy) (as Dynata, LLC); Vermont (as Dynata, LLC)
<b>85</b>	Early Warning Services, LLC*‡	Vermont (as Early Warning Services, LLC)
<b>86</b>	Chex Systems, Inc.*‡	Vermont (as Chex Systems, Inc.; Efunds; Efunds Corporation; Worldpay LLC; Worldpay, LLC)
<b>87</b>	Electronic Commerce A To Z*	Vermont (as Electronic Commerce A To Z)
<b>88</b>	Email Marketing Services, Inc*‡	California AG (legacy) (as Email Marketing Services, Inc)
<b>89</b>	Emailmovers Ltd*‡	California AG (legacy) (as Emailmovers Ltd)
<b>90</b>	EMERGES.COM INCORPORATED*‡	California AG (legacy) (as Emerges.Com); Vermont (as Emerges.Com; Emerges.Com, Inc); Texas (as Emerges.Com Inc.); Oregon (as EMERGES.COM INCORPORATED; Emerges.Com; Emerges.Com Incorporated)
<b>91</b>	Equimine*	California AG (legacy) (as Equimine); Vermont (as Equimine)
<b>92</b>	Exponential Interactive, Inc.*‡	California AG (legacy) (as Exponential Interactive, Inc.; Vdx.Tv)
<b>93</b>	Factori Technologies LLC	California AG (legacy) (as Factori Technologies LLC)
<b>94</b>	Fair Screen, Inc.*	Vermont (as Fair Screen, Inc.)
<b>95</b>	Fanspoko, LLC*	Vermont (as Fanspoko, LLC)
<b>96</b>	First American Data Tree LLC*‡	Vermont (as First American Data Tree LLC)
<b>97</b>	FIRST MOVERS ADVANTAGE LLC*‡	California AG (legacy) (as First Movers Advantage, LLC); Oregon (as FIRST MOVERS ADVANTAGE LLC)
<b>98</b>	FREEMIUM DATA SERVICE LLC*‡	Vermont (as Freemium Data Services, LLC); Oregon (as FREEMIUM DATA SERVICE LLC; Reachdata.Com)
<b>99</b>	Freshaddress, LLC*	Vermont (as Freshaddress, LLC)
<b>100</b>	FULLCONTACT Inc*‡	California AG (legacy) (as FullContact); Vermont (as Fullcontact, Inc.); Oregon (as FULLCONTACT Inc)
<b>101</b>	Fused Leads, LLC*	Vermont (as Fused Leads, LLC)
<b>102</b>	Casters Holdings LLC*‡	California AG (legacy) (as Fylo); Vermont (as Casters Holdings LLC)
<b>103</b>	G2 Bankruptcy Risk Solutions, Inc.*	Vermont (as G2 Bankruptcy Risk Solutions, Inc.)
<b>104</b>	Glad I Know, Inc.*‡	California AG (legacy) (as Glad I Know, Inc.)
<b>105</b>	Good Boy Studios, Inc	California AG (legacy) (as Good Boy Studios, Inc)
<b>106</b>	Granite Lists, LLC*	Vermont (as Granite Lists, LLC)
<b>107</b>	Grata Inc	California AG (legacy) (as Grata Inc)

<b>108</b>	Gravy Analytics, Inc.*‡	California AG (legacy) (as Gravy Analytics, Inc.); Vermont (as Gravy Analytics, Inc.)
<b>109</b>	Greenhouse Software, Inc.*‡	California AG (legacy) (as Greenhouse Software, Inc.)
<b>110</b>	Gumgum, Inc.*‡	Vermont (as Gumgum, Inc.)
<b>111</b>	Gunderson Direct*	Vermont (as Gunderson Direct)
<b>112</b>	H1 Insights Inc.*‡	California AG (legacy) (as H1 Insights Inc.)
<b>113</b>	Hamza Online Services, LLC*	Texas (as Hamza Online Services, LLC)
<b>114</b>	Harmon Research Group, LLC*‡	California AG (legacy) (as Harmon Research Group, LLC)
<b>115</b>	HD INFORMATION LLC*	Vermont (as HD Information, LLC); Oregon (as HD INFORMATION LLC)
<b>116</b>	Health Is Wealth Marketing LLC	California AG (legacy) (as Health Is Wealth Marketing LLC; Pickmedicare)
<b>117</b>	HERE North America LLC	California AG (legacy) (as HERE North America LLC)
<b>118</b>	Hexasoft Development Sdn. Bhd.*‡	California AG (legacy) (as Hexasoft Development Sdn. Bhd.)
<b>119</b>	Backgroundchecks.Com LLC*‡	Vermont (as Backgroundchecks.Com LLC; Bgc; General Information Solutions LLC; Gis; Hireright, LLC)
<b>120</b>	Home Contractors Review, LLC*	Vermont (as Five Star Rated; Home Contractors Review, LLC; Home Services Review)
<b>121</b>	Homeowners Marketing Services Inc*‡	California AG (legacy) (as Homeowners Marketing Services Inc); Vermont (as Homeowners Marketing Services, Inc)
<b>122</b>	Hybrid Theory*‡	California AG (legacy) (as Hybrid Theory)
<b>123</b>	Idengine LLC*	Vermont (as Idengine LLC)
<b>124</b>	Illumin Inc.*‡	California AG (legacy) (as Illumin Inc.)
<b>125</b>	Imprint Analytics LLC*‡	California AG (legacy) (as Imprint Analytics LLC)
<b>126</b>	INBOX CREDIT INNOVATIONS LLC*‡	Oregon (as INBOX CREDIT INNOVATIONS LLC; Monitorbase)
<b>127</b>	Incheck Inc*‡	Vermont (as Incheck Inc)
<b>128</b>	Inflection Risk Solutions, LLC*‡	Vermont (as Inflection Risk Solutions, LLC; Inflection.Com, Inc)
<b>129</b>	Infocore Inc.*‡	Vermont (as Infocore Inc.)
<b>130</b>	Infofree.Com LLC*‡	California AG (legacy) (as Infofree.com); Vermont (as Infofree.com); Texas (as Infofree.Com LLC)
<b>131</b>	Infogroup Inc.*‡	Vermont (as Infogroup Inc.)
<b>132</b>	Infutor Data Solutions*‡	Vermont (as Infutor Data Solutions; Infutor Data Solutions LLC; Ruf Strategic Solutions); Oregon (as Infutor Data Solutions LLC)

<b>133</b>	Inmobi	California AG (legacy) (as Inmobi)
<b>134</b>	Innovis Data Solutions, Inc.*	Vermont (as Innovis Data Solutions, Inc.)
<b>135</b>	InsideView, Inc.*	Vermont (as InsideView, Inc.; Insideview)
<b>136</b>	Integrated Medical Data, LLC.*‡	California AG (legacy) (as Integrated Medical Data, LLC.)
<b>137</b>	Intellicorp Records, Inc.*‡	Vermont (as Intellicorp Records, Inc.)
<b>138</b>	Intentgine Inc.	California AG (legacy) (as Intentgine Inc.)
<b>139</b>	Intentmacro Inc.	California AG (legacy) (as Intentmacro Inc.)
<b>140</b>	IHS Markit*‡	California AG (legacy) (as Ipreo); Vermont (as IHS Markit)
<b>141</b>	Ipsos*‡	California AG (legacy) (as Ipsos)
<b>142</b>	IQ Data Systems, Inc.*‡	Vermont (as Backgrounds Online; IQ Data Systems, Inc.)
<b>143</b>	Ivy Tech Re, LLC*	Vermont (as Ivy Data; Ivy Tech Re, LLC)
<b>144</b>	Jverify, Inc.*	Vermont (as Jverify, Inc.)
<b>145</b>	KBM GROUP LLC*	Vermont (as KBM GROUP LLC; KBM Group LLC)
<b>146</b>	Killi Ltd.*	Vermont (as Killi Ltd.)
<b>147</b>	Klarifi*	Vermont (as Klarifi)
<b>148</b>	Knowwho*	Vermont (as Knowwho; Knowwho, Inc.)
<b>149</b>	KOCHAVA Inc.*	Vermont (as KOCHAVA Inc.; Kochava Inc.)
<b>150</b>	Kols (Key Opinion Leaders)*‡	California AG (legacy) (as Kols (Key Opinion Leaders))
<b>151</b>	Kyber Health Data LLC*	California AG (legacy) (as Kyber Health Data LLC)
<b>152</b>	Leadership Connect*‡	California AG (legacy) (as Leadership Connect)
<b>153</b>	Leadloft Inc.*‡	California AG (legacy) (as Leadloft Inc.)
<b>154</b>	LET IT RIDE SPORTS LLC*	Vermont (as LET IT RIDE SPORTS LLC)
<b>155</b>	Lifesight LLC*‡	California AG (legacy) (as Lifesight LLC)
<b>156</b>	Lightbox Parent, L.P.*	Vermont (as Lightbox Parent, L.P.)
<b>157</b>	Lighthouse List*‡	California AG (legacy) (as Lighthouse List)
<b>158</b>	Limeleads	California AG (legacy) (as Limeleads)
<b>159</b>	Listings, Information, Systems And Tabulation Services, Inc*‡	California AG (legacy) (as Listings, Information, Systems And Tabulation Services, Inc)
<b>160</b>	List Service Direct Inc.*	California AG (legacy) (as List Service Direct Inc.); Vermont (as List Service Direct Inc.)

<b>161</b>	Listsonline*‡	California AG (legacy) (as Listsonline); Vermont (as Listsonline)
<b>162</b>	Localblox*	Vermont (as Localblox)
<b>163</b>	Logiq, Inc*‡	California AG (legacy) (as Logiq, Inc); Vermont (as Logiq, Inc)
<b>164</b>	Lotadata, Inc.*‡	California AG (legacy) (as Lotadata, Inc.)
<b>165</b>	Lucid Holdings, LLC*‡	California AG (legacy) (as Lucid Holdings, LLC); Vermont (as Lucid Holdings, LLC)
<b>166</b>	Lundquist Consulting, Inc.*‡	Vermont (as Lundquist Consulting, Inc.)
<b>167</b>	MACHINTEL Inc*	California AG (legacy) (as Machintel); Vermont (as Machintel; Machintel Inc.); Texas (as Machintel Inc.); Oregon (as MACHINTEL Inc)
<b>168</b>	Madison Logic, Inc.	California AG (legacy) (as Madison Logic, Inc.)
<b>169</b>	Marinus Analytics	California AG (legacy) (as Marinus Analytics)
<b>170</b>	Martin Data LLC*	California AG (legacy) (as Martin Data LLC); Vermont (as Martin Data LLC; Martin Data, LLC)
<b>171</b>	Matchandappend.Com LLC*‡	California AG (legacy) (as Matchandappend.Com LLC)
<b>172</b>	MCH Inc*‡	California AG (legacy) (as MCH Strategic Data); Vermont (as MCH Inc; MCH Inc.; MCH Strategic Data; Mch, Inc.)
<b>173</b>	Media Direct, Inc.*	California AG (legacy) (as Media Direct, Inc.); Vermont (as Media Direct, Inc.)
<b>174</b>	Mediamath, Inc.*‡	California AG (legacy) (as Mediamath, Inc.)
<b>175</b>	MEDIA RESOURCE GROUP LLC*‡	California AG (legacy) (as Media Resource Group, Inc.); Vermont (as Media Resource Group LLC; Media Resource Group, Inc; Media Resource Group, Inc.); Oregon (as MEDIA RESOURCE GROUP LLC; Media Resource Group LLC)
<b>176</b>	Mediasoft, LLC*‡	California AG (legacy) (as Mediasoft, LLC)
<b>177</b>	Media Source Solutions	California AG (legacy) (as Media Source Solutions)
<b>178</b>	Mediazod LLC*‡	California AG (legacy) (as Leadzod.Com; Mediazod LLC)
<b>179</b>	MFI Credit Solutions*	Vermont (as MFI Credit Solutions)
<b>180</b>	Mightyrep*‡	California AG (legacy) (as Mightyrep)
<b>181</b>	MILESTONE MARKETING SOLUTIONS*‡	California AG (legacy) (as Milestone Marketing Solutions); Oregon (as MILESTONE MARKETING SOLUTIONS)
<b>182</b>	Modernize, Inc.*‡	Vermont (as Modernize, Inc.)
<b>183</b>	Modigie Inc.*‡	California AG (legacy) (as Modigie Inc.)
<b>184</b>	Msim, LLC*	Vermont (as Msim, LLC)

<b>185</b>	MY RENTER CHECKER LLC*‡	California AG (legacy) (as MY RENTER CHECKER LLC)
<b>186</b>	National Consumer Telecom & Utilities Exchange, Inc.*	Vermont (as National Consumer Telecom & Utilities Exchange, Inc.)
<b>187</b>	NATIONAL STUDENT CLEARINGHOUSE*‡	Vermont (as NATIONAL STUDENT CLEARINGHOUSE)
<b>188</b>	NCR Corporation*	Vermont (as NCR Corporation)
<b>189</b>	NEAR PTE LTD*‡	California AG (legacy) (as NEAR PTE LTD; Near Intelligence Holdings, Inc; Near Intelligence PTE. LTD); Vermont (as Near Intelligence Holdings, Inc; Near Intelligence PTE. LTD; Near North America)
<b>190</b>	New England List Services*	Vermont (as New England List Services; New England List Services, Inc)
<b>191</b>	New Strata Inc.*	Vermont (as New Strata Inc.)
<b>192</b>	Nexsales Solutions Inc.	California AG (legacy) (as Nexsales Solutions Inc.)
<b>193</b>	NEXXA GROUP Inc*‡	California AG (legacy) (as Nexxa Group, Inc.); Vermont (as Nexxa Group; Nexxa Group, Inc.); Texas (as Nexxa Group, Inc.); Oregon (as NEXXA GROUP Inc)
<b>194</b>	NOVA List Company, LLC*	California AG (legacy) (as NOVA List Company, LLC); Vermont (as NOVA List Company, LLC)
<b>195</b>	Nymblr, Inc.*‡	California AG (legacy) (as Nymblr, Inc.); Vermont (as Nimbler; Nymblr, Inc.)
<b>196</b>	Onemata Corporation*	California AG (legacy) (as Onemata Corporation); Vermont (as Onemata Corporation)
<b>197</b>	One Model, Inc.*‡	California AG (legacy) (as One Model, Inc.)
<b>198</b>	On Hold-America, Inc.‡	California AG (legacy) (as KYC Data; On Hold-America, Inc.)
<b>199</b>	Optimal Fusion*‡	California AG (legacy) (as Optimal Fusion)
<b>200</b>	Oracle America Inc*‡	California AG (legacy) (as Oracle America, Inc.; Oracle Data Cloud); Vermont (as Oracle Advertising; Oracle America Inc; Oracle America, Inc.; Oracle Data Cloud); Oregon (as Oracle America Inc)
<b>201</b>	ORIGIN8 Inc*	Vermont (as ORIGIN8 Inc)
<b>202</b>	Parasol Media Inc.*‡	Vermont (as Parasol Media Inc.)
<b>203</b>	Partners Credit And Verification Solutions*	Vermont (as Partners Credit And Verification Solutions)
<b>204</b>	PATHWAY VENTURES LLC*‡	California AG (legacy) (as Pathway Ventures, LLC); Oregon (as PATHWAY VENTURES LLC)

<b>205</b>	PEEKYOU LLC*‡	California AG (legacy) (as Peekyou LLC); Oregon (as PEEKYOU LLC; Peekyou LLC)
<b>206</b>	Pension Benefit Information, LLC*‡	California AG (legacy) (as Pension Benefit Information, LLC)
<b>207</b>	Peopleconnect, Inc.*	Vermont (as Peopleconnect, Inc.)
<b>208</b>	Perf Labs, Inc.	California AG (legacy) (as Interseller; Perf Labs, Inc.)
<b>209</b>	Permutive, Inc*‡	California AG (legacy) (as Permutive, Inc)
<b>210</b>	Plexuss, Inc.*‡	California AG (legacy) (as Plexuss, Inc.)
<b>211</b>	Plural Marketing Solutions Inc.*‡	Vermont (as Plural Marketing Solutions Inc.)
<b>212</b>	Polity*	Vermont (as Polity)
<b>213</b>	Preferred Communications*	California AG (legacy) (as Preferred Communications); Vermont (as Preferred Communications; Preferred Communications Data)
<b>214</b>	Project Applegart LLC*‡	Vermont (as Project Applegart LLC)
<b>215</b>	Prospector Database, LLC*	Vermont (as Prospector Database, LLC)
<b>216</b>	Proxima Platform*	Vermont (as Proxima Platform)
<b>217</b>	Qwoted, Inc.*	Vermont (as Qwoted, Inc.)
<b>218</b>	Reach Marketing LLC	California AG (legacy) (as Reach Marketing LLC)
<b>219</b>	Reality Media, Inc.	California AG (legacy) (as Reality Media, Inc.)
<b>220</b>	Reallygreatrate, Inc.	California AG (legacy) (as RGR Marketing; Reallygreatrate, Inc.)
<b>221</b>	Recsolu Inc.*	Vermont (as Recsolu Inc.)
<b>222</b>	Redbird Direct LLC*‡	California AG (legacy) (as Redbird Direct LLC)
<b>223</b>	Refinitiv US LLC*‡	Vermont (as Refinitiv US LLC)
<b>224</b>	Bureau Van Dijk Electronic Publishing Ltd.*‡	California AG (legacy) (as Bureau Van Dijk Electronic Publishing Ltd.; Regulatory Datacorp, Inc.)
<b>225</b>	Reis Inc.*‡	California AG (legacy) (as Reis Inc.)
<b>226</b>	RELPRO Inc*‡	Vermont (as Relpro, Inc.); Texas (as Relpro, Inc.); Oregon (as RELPRO Inc)
<b>227</b>	Rent Risk LLC*	Vermont (as Rent Risk LLC)
<b>228</b>	ResearchUSA*‡	California AG (legacy) (as ResearchUSA); Texas (as Researchusa LLC)
<b>229</b>	Results Only Consulting And Advertising*‡	California AG (legacy) (as Results Only Consulting And Advertising)
<b>230</b>	Revenuebase Inc*	Vermont (as Revenuebase Inc)
<b>231</b>	Rhetorik Limited*‡	California AG (legacy) (as Rhetorik Limited)

<b>232</b>	Riv Data Corp*‡	Vermont (as Carpe Data; Riv Data Corp; Riv Data Corp.)
<b>233</b>	RP On-Site LLC*	Vermont (as RP On-Site LLC)
<b>234</b>	Safegraph Inc.*‡	California AG (legacy) (as Safegraph Inc.)
<b>235</b>	Saferent Solutions, LLC*	Vermont (as Saferent Solutions, LLC)
<b>236</b>	Saha Ventures LLC*	California AG (legacy) (as Saha Ventures LLC); Vermont (as Saha Ventures LLC)
<b>237</b>	Saleseer, Inc.*	Texas (as Saleseer, Inc.)
<b>238</b>	Salesintel Research Inc*‡	California AG (legacy) (as Salesintel Research Inc.); Vermont (as Salesintel Research Inc)
<b>239</b>	Sawyer Lists, LLC	California AG (legacy) (as Sawyer Lists, LLC)
<b>240</b>	Scileads*‡	California AG (legacy) (as Scileads); Vermont (as Scileads Ltd)
<b>241</b>	Scraping Robot, LLC	California AG (legacy) (as Scraping Robot, LLC)
<b>242</b>	Scryer, Inc.	California AG (legacy) (as Reonomy; Scryer, Inc.)
<b>243</b>	Search America LLC*	Vermont (as Search America LLC)
<b>244</b>	SEARCHBUG Inc*‡	California AG (legacy) (as Searchbug); Texas (as Searchbug, Inc.); Oregon (as SEARCHBUG Inc; Searchbug.Com)
<b>245</b>	Sentilink Corp*‡	California AG (legacy) (as Sentilink Corp)
<b>246</b>	Service 1St Information Solutions LLC*	Vermont (as Service 1St Information Solutions LLC)
<b>247</b>	SG360	California AG (legacy) (as SG360)
<b>248</b>	Skipmasher, Inc.*	Vermont (as Skipmasher, Inc.; Skipmasher, Inc.)
<b>249</b>	Skyhook Holding, Inc.*‡	California AG (legacy) (as Skyhook Holding, Inc.); Vermont (as Skyhook Holding, Inc.)
<b>250</b>	SMA COMMUNICATIONS LLC*	California AG (legacy) (as SMA Communications, LLC.); Vermont (as SMA COMMUNICATIONS LLC; SMA Communications; SMA Communications Inc)
<b>251</b>	Sourceit Technologies, Inc*‡	California AG (legacy) (as Sourceit Technologies, Inc)
<b>252</b>	Sourcescrub LLC	Vermont (as Sourcescrub LLC)
<b>253</b>	Spectrum Mailing Lists	California AG (legacy) (as Spectrum Mailing Lists)
<b>254</b>	R.L. Polk & Co.*‡	California AG (legacy) (as S&P Global Inc.); Texas (as R.L. Polk & Co.); Oregon (as R.L.POLK & COMPANY; S&P GLOBAL Inc)
<b>255</b>	Spy Dialer Labs Inc*‡	California AG (legacy) (as Spy Dialer, Inc.; Spydialer.Com); Vermont (as Spy Dialer Labs Inc; Spy Dialer, Inc.)

<b>256</b>	Staircase, Inc.*	California AG (legacy) (as Staircase, Inc.); Vermont (as Staircase, Inc.)
<b>257</b>	STEP2SUCCESS Marketing*‡	California AG (legacy) (as STEP2SUCCESS Marketing)
<b>258</b>	Strata Company*	California AG (legacy) (as Strata Company); Vermont (as Strata Company)
<b>259</b>	Strategic Data Intelligence*‡	California AG (legacy) (as Strategic Data Intelligence)
<b>260</b>	Strategic Information Resources*‡	Vermont (as Strategic Information Resources)
<b>261</b>	Stratmish, LLC*	Vermont (as Stratmish, LLC)
<b>262</b>	Structure*	California AG (legacy) (as Structure); Vermont (as Structure)
<b>263</b>	Suus, LLC*	Vermont (as Suus, LLC)
<b>264</b>	Tandem Marketing, LLC	California AG (legacy) (as Tandem Marketing, LLC)
<b>265</b>	TASK GENIE Inc*‡	Texas (as Task Genie, Inc.); Oregon (as Datalane; TASK GENIE Inc)
<b>266</b>	Telefi LLC	California AG (legacy) (as Telefi LLC)
<b>267</b>	The Lead Company, Inc.*	Vermont (as The Lead Company, Inc.)
<b>268</b>	The Open Data People, Inc.*‡	California AG (legacy) (as Openpeoplesearch.Com; The Open Data People, Inc.); Vermont (as The Open Data People, Inc.)
<b>269</b>	Tinuiti, Inc.*	Vermont (as Tinuiti, Inc.)
<b>270</b>	Tiplinks Inc	California AG (legacy) (as Tiplinks Inc)
<b>271</b>	TL1MKT SL SL*‡	California AG (legacy) (as TL1MKT SL SL)
<b>272</b>	Towerdata, Inc.*	California AG (legacy) (as Towerdata, Inc.); Vermont (as Towerdata, Inc.; Towerdata, LLC)
<b>273</b>	Tracers Information Specialists, Inc.*‡	Vermont (as Tracers Information Specialists, Inc.)
<b>274</b>	Twine Data, Inc*‡	Vermont (as Twine Data, Inc)
<b>275</b>	Tymax Media*‡	California AG (legacy) (as Tymax Media)
<b>276</b>	Ubermedia*‡	California AG (legacy) (as Ubermedia)
<b>277</b>	United One Resources, Inc.*	Vermont (as United One Resources, Inc.)
<b>278</b>	Unity Technologies SF*‡	California AG (legacy) (as Unity Technologies SF)
<b>279</b>	Datamentors LLC*‡	California AG (legacy) (as V12 Privacy); Vermont (as Datamentors LLC; V12)
<b>280</b>	Verse Gaming*	Vermont (as Verse Gaming)
<b>281</b>	Verify, Inc*	Vermont (as Verify, Inc)
<b>282</b>	Vror LLC*	Texas (as Vror LLC)
<b>283</b>	Wholesale Mail	California AG (legacy) (as Wholesale Mail)

<b>284</b>	Whoodle, LLC*‡	Vermont (as Whoodle, LLC)
<b>285</b>	Wisdom Media Group LLC*‡	California AG (legacy) (as Wisdom Media Group LLC)
<b>286</b>	Wiza, Inc.*‡	California AG (legacy) (as Wiza, Inc.)
<b>287</b>	Xactus, LLC*	Vermont (as Xactus, LLC)
<b>288</b>	X-Mode Social, Inc.	California AG (legacy) (as X-Mode Social, Inc.)
<b>289</b>	Xome Inc.*‡	California AG (legacy) (as Xome Inc.); Vermont (as Xome Inc.; Xome Leads LLC)
<b>290</b>	Yobi Ventures, LLC	California AG (legacy) (as Yobi Ventures, LLC)
<b>291</b>	Zeotap GmbH*	Vermont (as Zeotap GmbH)

## **Appendix B: Complete Normalized Data Broker Registry**

Detailed information about all data brokers analyzed, including those identified above as not registered in your state and brokers listed across multiple registries, is available in the accompanying file, "Data\_Broker\_Full\_Registry\_2025.xlsx." This file provides standardized contact details, registry affiliations, data collection practices, and grouping identifiers to support further investigation and enforcement activities.