

June 24, 2025

The Honorable Rob Bonta
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Michael S. Macko
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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.¹

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.

¹ <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,

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Privacy Rights Clearinghouse

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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	Deeprace Inc.*‡	California AG (legacy) (as Deeprace 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)

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

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

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

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

185	MY RENTER CHECKER LLC*‡	California AG (legacy) (as MY RENTER CHECKER LLC)
186	National Consumer Telecom & Utilities Exchange, Inc.*	Vermont (as National Consumer Telecom & Utilities Exchange, Inc.)
187	NATIONAL STUDENT CLEARINGHOUSE*‡	Vermont (as NATIONAL STUDENT CLEARINGHOUSE)
188	NCR Corporation*	Vermont (as NCR Corporation)
189	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)
190	New England List Services*	Vermont (as New England List Services; New England List Services, Inc)
191	New Strata Inc.*	Vermont (as New Strata Inc.)
192	Nexsales Solutions Inc.	California AG (legacy) (as Nexsales Solutions Inc.)
193	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)
194	NOVA List Company, LLC*	California AG (legacy) (as NOVA List Company, LLC); Vermont (as NOVA List Company, LLC)
195	Nymbler, Inc.*‡	California AG (legacy) (as Nymbler, Inc.); Vermont (as Nimbler; Nymbler, Inc.)
196	Onemata Corporation*	California AG (legacy) (as Onemata Corporation); Vermont (as Onemata Corporation)
197	One Model, Inc.*‡	California AG (legacy) (as One Model, Inc.)
198	On Hold-America, Inc.‡	California AG (legacy) (as KYC Data; On Hold-America, Inc.)
199	Optimal Fusion*‡	California AG (legacy) (as Optimal Fusion)
200	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)
201	ORIGIN8 Inc*	Vermont (as ORIGIN8 Inc)
202	Parasol Media Inc.*‡	Vermont (as Parasol Media Inc.)
203	Partners Credit And Verification Solutions*	Vermont (as Partners Credit And Verification Solutions)
204	PATHWAY VENTURES LLC*‡	California AG (legacy) (as Pathway Ventures, LLC); Oregon (as PATHWAY VENTURES LLC)

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

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

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

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