

State Attorneys General & Privacy:

Enforcement Trends, 2020-2024



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About EPIC

The Electronic Privacy Information Center (EPIC) was established in 1994 to protect privacy, freedom of expression, and democratic values in the information age. Our mission is to secure the fundamental right to privacy in the digital age for all people through advocacy, research, and litigation. We are an independent 501(c)(3) non-profit research and advocacy center, meaning that we do not accept funding from the government nor from corporate foundations.

Authors

Suzanne Bernstein, Counsel
Chris Frascella, Counsel

Contributors

Caitriona Fitzgerald, Deputy Director
John Davisson, Director of Litigation
Calli Schroeder, Senior Counsel
Megan Iorio, Senior Counsel
Sara Geoghegan, Senior Counsel
Tom McBrien, Counsel
Kara Williams, Counsel

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I. EXECUTIVE SUMMARY

The need to become more organized in our fight to protect our fundamental right to privacy as individuals living in America has never been clearer. The current federal environment is not only hostile to but is actively dismantling the federal administrative regime across all three branches of government. Tech industry lobbyists – in addition to successfully preventing Congress from enacting federal comprehensive privacy legislation for decades and exerting influence over the very federal consumer protection agencies that are supposed to regulate them – have formed super PACs to shape state law where they can and to influence Congress to preempt attentive state legislatures where they cannot. Against this backdrop, the consumer protection role of State AGs as enforcers of our privacy rights has never been more vital.

The Electronic Privacy Information Center (EPIC) created this report to serve as a reference tool for those ready to make progress in protecting our privacy and autonomy from corporate interests, as part of EPIC’s ongoing work to support State AG privacy enforcement. It outlines, for example, where State AGs (including five U.S. territories and DC) have focused their enforcement efforts, how they collaborate, and what sources of legal authority they have invoked in their privacy-related cases and settlements. The State AG enforcement actions catalogued in this report not only address data collection and sharing but also respond to attempts to erode our ability to make informed choices and to enjoy equal opportunities as consumers. The datasets underlying this report comprise more than 220 cases and settlements, 35 enforcement letters, and 20 public investigations spanning from January 2020 to December 2024.

The report’s two primary co-authors have created a taxonomy of six Issue Categories to organize these efforts into intelligible form and have highlighted notable trends within each Issue Category using three related datasets.

- Information compiled about the **Unwanted Calls & Texts** Issue Category, for example, showed that State AGs, primarily through the Anti-Robocall Task Force, have begun targeting the voice service and intermediate providers transmitting illegal calls – not merely pursuing the problematic callers themselves.

¹ A collaboration of the Center for Consumer Law and Economic Justice at Berkeley Law and the National Association of Consumer Advocates (NACA).

² Available at https://cdt.org/wp-content/uploads/privacy/20080812_ag_consumer_risk.pdf.

- In the **Data Breach** Issue Category, more than 90% of state participation was through Multistate coalitions rather than Single State efforts.
- Inversely, State AGs carried out the vast majority (90%+) of cases and settlements within the **Data Privacy** Issue Category as Single State efforts.
- There was a high level of collaboration between State AGs and federal agencies in the **Antitrust** Issue Category.
- The **Platform Accountability & Governance** Issue Category showed dramatic growth after 2022, strongly implying behind-the-scenes coordination among State AGs.
- Only a small number of enforcement actions from 2020 to 2024 seemed to fit best within the **Algorithms & Automated Systems** Issue Category.

There are valuable lessons to be learned here, especially as new state privacy authorities become available for State AGs to enforce. More state privacy laws will be coming online imminently; existing state privacy laws and regulations continue to mature (some of which we feature in the enforcement actions documented in this report). These new authorities may alleviate some of the resource-intensive work involved in fitting state consumer protection laws to privacy violations; hopefully it will be easier for State AGs to show a court that a violation has occurred where a law with clear substantive language has been specifically tailored to preventing or remedying privacy harms. We also think more explicit rules of the road will benefit businesses as well; while more cynical and powerful companies seem to resist any form of regulation, many businesses want to maintain trust with consumers without being left at a disadvantage because their competitors continue to flout the law with impunity.

To better enable others to help carry this work forward, we have provided robust annotation of our methodology throughout and provided much of the underlying data in Appendices. We welcome additional information and differing perspectives regarding these datasets and our presentation of them. We designed the data visualizations within this report to paint a picture of what has occurred in recent history, not to serve as statistical conclusions.

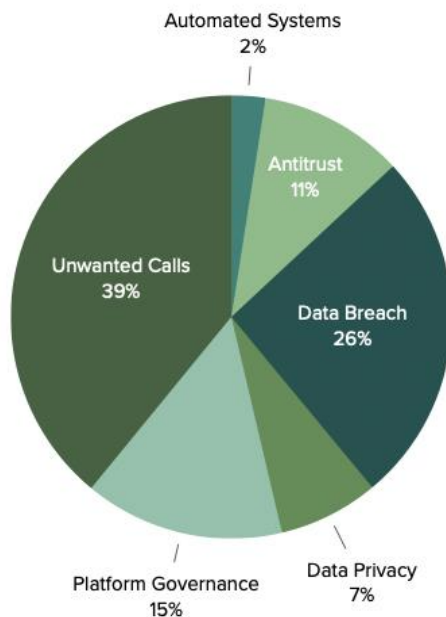
We all share a fundamental right to privacy, and we thank the fifty-six State AGs across the country for their important work in protecting it.

– *John Davisson, Director of Litigation*

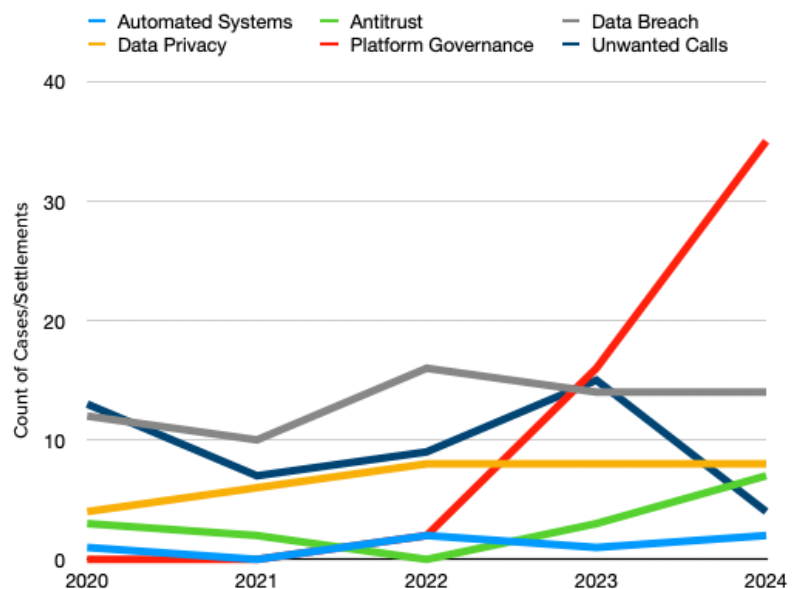
II. NOTABLE TAKEAWAYS

The datasets underlying this report comprise more than 220 cases and settlements, 35 enforcement letters, and 20 public investigations from January 2020 through December 2024. The report analyzes various trends over time, including patterns in AG collaboration, issue category, claim type, legal authority, enforcement type, and volume.

TOTAL ACTIONS, BY ISSUE CATEGORY



INDIVIDUAL CASES, BY ISSUE CATEGORY



- **Unwanted Calls & Texts.** State AGs sent many warning letters in this issue category through a large Multistate coalition but brought and resolved litigation more often as single states.
- **Data Breach.** Over 90% of the data breach enforcement actions were brought collaboratively as Multistate efforts.
- **Antitrust.** The majority of antitrust enforcement actions were brought collaboratively and relied heavily on federal law, with 60% of cases including at least one federal law claim.
- **Data Privacy.** Over 90% of enforcement actions related to data privacy were brought by a single State AG rather than a Multistate coalition; nearly every case included a State Consumer Protection law claim.
- **Platform Accountability & Governance.** Enforcement in this area relied heavily on State Consumer Protection laws focusing on kids' online safety and saw a spike in enforcement actions after 2022.
- **Algorithms & Automated Systems.** There were few enforcement actions in this area compared to other issue areas over the same period.

III. INTRODUCTION

The Electronic Privacy Information Center (EPIC) was established in 1994 to protect privacy, freedom of expression, and democratic values in the information age. EPIC is publishing this report to shine a light not only on the threats to these values but also on the herculean enforcement efforts undertaken by State AGs to preserve and advance those same values and to secure the fundamental right to privacy in the digital age for all people.

This report is an initial, curated compilation of privacy-related enforcement actions brought by State Attorneys General (AGs)³ from 2020–2024. It is intended to serve as a reference that illustrates for this recent time period: (i) where AGs have focused their efforts; (ii) when they have collaborated with one another and with federal agencies; and (iii) what overarching types of claims they have brought in response to alleged privacy harms. We believe this will be a valuable resource for policymakers, public interest attorneys, and other consumer advocates, especially as new privacy laws are coming into effect. It is one component of EPIC’s broader, ongoing project to support State AG enforcement against businesses that violate our privacy.

After reviewing hundreds of enforcement actions within that five-year span (2020–2024),⁴ we have developed a taxonomy of six Issue Categories to roughly organize these privacy-related State AG efforts: Unwanted Calls & Texts, Data Breach, Antitrust, Data Privacy, Platform Accountability & Governance, and Algorithms & Automated Systems.

Despite the law’s oft-asserted inability to keep pace with technological innovation, individual enforcement actions may be gradually catching up to privacy violations by businesses. Among their many other responsibilities, State AGs are entrusted with such

³ We use the shorthand “State AG (s)” throughout this report but acknowledge that this report includes the work of several AGs who may not technically be *State* AGs, for example the respective AGs for the District of Columbia, several U.S. Territories (e.g. Puerto Rico), and Commonwealths (e.g. Virginia).

⁴ We reviewed enforcement actions in a variety of formats, including, for example, Complaints filed in court, Assurances of Voluntary Compliance, letters to specific companies, and public announcements by State AGs regarding investigations of specific companies. If a company was not named, we included the information in Appendices 4 or 5.

an enforcement role.⁵ Where states have recently enacted comprehensive privacy laws – or more sector-specific privacy laws such as health privacy, biometric privacy, and cybersecurity laws – AGs have been able to leverage these new authorities. However, in many instances state enforcers are continuing to rely upon their more traditional general consumer protection authorities – for example, their respective Unfair or Deceptive Acts or Practices (UDAP) statutes. State AGs also have the authority to enforce certain decades-old federal laws and regulations, such as the Health Insurance Portability and Accountability Act (HIPAA), the Children’s Online Privacy Protection Act (COPPA), the Sherman Act, and the Telemarketing Sales Rule (TSR).

Even prior to the current Presidential Administration, federal agencies like the Federal Trade Commission (FTC), Consumer Financial Protection Bureau (CFPB), and Federal Communications Commission (FCC) struggled to adequately fulfill their nationwide consumer protection mandates due to inadequate resources and regulatory capture.⁶ Since at least 2020 (the earliest year this report reaches), State AGs have been striving to fill these gaps to address an era of rapid evolution in tech-facilitated harms. The datasets underlying this report represent more than 220 relevant cases and settlements, more than 35 relevant letters and other enforcement actions, and more than 20 distinct public announcements of investigations. In the current federal environment, which is hostile to and actively undermining the federal administrative regime, the consumer protection role of State AGs has never been more vital.⁷

This report contains the following sections:

- **Executive Summary & Notable Takeaways** – just the highlights
- **Introduction** – what this report is and what it is meant to accomplish
- **Scope** – where we drew the boundaries of what would be relevant to this report
- **Methodology** – how we went about collecting, categorizing, and visualizing data

⁵ By some accounts, State AGs have blazed several trails in privacy enforcement. *See, e.g.,* Danielle Keats Citron, *The Privacy Policymaking of State Attorneys General*, 92 Notre Dame L. Rev. 747, 749-50 (2016), <https://scholarship.law.nd.edu/cgi/viewcontent.cgi?article=4693&context=ndlr>.

⁶ That said, this report notes several points where federal agencies seemed to play a parallel role to State AG efforts, even if those agencies were not listed together in the same signature block. At a minimum, we note this in the Methodology subsection at the end of each Issue Category section.

⁷ State AGs also indirectly help private plaintiffs enforce privacy rights. This will become increasingly significant as more laws addressing privacy harms take effect.

- **Enforcement Actions & Collaboration** – high-level overview of State AG mandates, including how they team up with other agencies, and how this report represents those efforts
- **Issue Category Taxonomy: Six Areas of Privacy Harms**
 - **Unwanted Calls & Texts** – ignoring consumer Do Not Call requests, sending pre-recorded messages without adequate consent, facilitating illegal calls
 - **Data Breaches** – failing to prevent unauthorized access to consumer data
 - **Antitrust** – aggregations of consumer data or development of platforms powered by consumer data which have anticompetitive effects
 - **Data Privacy** – consumer data collection or use without adequate consumer consent
 - **Platform Accountability & Governance** – thwarting user choice through platform design features like engagement-maximizing algorithms and dark patterns
 - **Algorithms & Automated Systems** – automated determinations, such as tenant screening or facial recognition, or generation such as deepfakes
- **Conclusion** – our thoughts after producing this preliminary report
- **Appendices**
 - Appendix 1 – relevant cases and settlements⁸
 - Appendix 2 – other relevant enforcement actions, such as letters and investigations
 - Appendix 3 – this report’s taxonomy of state laws
 - Appendix 4 – examples of State AGs’ respective efforts to strengthen enforcement
 - Appendix 5 – data and visualizations for respective State AGs
 - Appendix 6 – compilation of all data visualizations

The Scope and Methodology sections of this report contain more detailed information about what data is included and how that data is interpreted. The charts and tables in this report organize the gathered data into Issue Categories (e.g., Data Breach and Unwanted Calls) and types of legal authority (e.g., general state consumer protection law, state telemarketing law, state antitrust law, and HIPAA). These visualizations of data also indicate whether actions were taken by a single State AG, by

⁸ As we explain in the Methodology section, *infra* p. 11-18, the data from this report was based on what was readily, publicly available. If a significant amount of additional relevant information becomes available, we will publish an updated edition of this report to ensure a more accurate historical record.

a coalition of State AGs, or by one or more State AGs in conjunction with a federal agency. Some actions could fit into multiple categories. For example, we categorized the RealPage enforcement actions within the Antitrust Issue Category, not the Algorithms & Automated Systems Issue Category; the alleged harm was price-fixing, facilitated by an algorithm, and the legal causes of action in each of the cases were alleged antitrust violations. This is one reason why we have included several appendices containing the data used to create this report⁹ – so others are empowered to analyze the dataset in different ways.¹⁰

The Enforcement Actions & Collaboration section discusses in greater detail what this report considers a relevant enforcement action. It also explores several examples of how different state- and federal-level entities have cooperated in their enforcement efforts to safeguard consumer privacy.

Six substantive Issue Category sections follow after that, beginning with where State AGs have the most robustly developed body of law to work with, and proceeding to areas where the law likely has the furthest to catch up: from Unwanted Calls & Texts, to Data Breaches, Antitrust, Data Privacy, Platform Accountability & Governance, and finally Algorithms & Automated Systems.

The report wraps up with a Conclusion and is accompanied by several Appendices presenting the data underlying this report, as well as alternative visualizations of that data.

A Note About Privacy Harms

As Professors Danielle Keats Citron and Daniel J. Solove compellingly articulated in their 2021 publication “Privacy Harms”, privacy harms can take many forms, from physical, economic, reputational, psychological, and relationship harms to discrimination and loss of autonomy.¹¹ While Citron and Solove were focused largely on the private litigation context, State AGs too must engage with these hazards to consumer privacy when reining in corporate misconduct. These threats include using

⁹ Appendices 1, 2, 3, and 5.

¹⁰ We welcome responses that propose alternative taxonomies or methodologies for future projects analyzing State AG privacy enforcement actions.

¹¹ Danielle Keats Citron & Daniel J. Solove, Privacy Harms, 102 B.U.L. Rev. Online 793, 830–59 (2021), <https://www.bu.edu/bulawreview/files/2022/04/CITRON-SOLOVE.pdf>.

flawed data or software code to automate denying opportunities at scale, exploiting unfair market advantage to power networks with aggregated consumer data (including customer loyalty program data), failing to take basic precautions to safeguard consumer data, designing platform features that maximize engagement and encourage compulsive use despite negative impact on user well-being, surreptitiously selling or sharing consumer data, and bombarding us consumers with unwanted calls and texts.

These privacy harms collect or otherwise use personal information without providing individuals any meaningful choice. In many ways, these actions deliberately erode consumer choice—in particular, choice about how our personal data is generated, collected, shared, used, and protected.

In an increasingly digital world, these harms are becoming more prevalent and more severe. To some extent, this was always going to be true as long as Congress failed to enact a meaningful federal comprehensive privacy law. However, these harms have become especially concerning in light of the current presidential administration. This administration has not only coopted or shuttered historically independent consumer protection agencies but has also aggregated as much data about us as possible, regardless of the privacy or security risks. Given this staggering abdication of responsibility and legal obligation at the federal level, it falls principally to states to decide what kinds of protection their residents can hope to enjoy. In terms of state comprehensive privacy laws, some laws are emphatically weaker than others.¹²

However, when it comes to enforcement, every state and many territories have taken some positive action within the last five years. With additional state privacy laws coming into effect or being fleshed out through active rulemakings in the coming months, State AGs will continue to gain specific enforcement authority to remedy growing threats to our privacy.

¹² See, e.g., EPIC, *The State of Privacy 2025: How State “Privacy” Laws Fail to Protect Privacy and What They Can Do Better* (Jan. 2025), <https://epic.org/documents/the-state-of-privacy-2025-how-state-privacy-laws-fail-to-protect-privacy-and-what-they-can-do-better/>; EPIC, *Unbridled and Underregulated: Removing FCRA and GLBA Exemptions from Privacy Laws to Hold Data Brokers Accountable* (Jul. 2025), <https://epic.org/documents/unbridled-and-underregulated-removing-fcra-and-glba-exemptions-from-privacy-laws-to-hold-data-brokers-accountable/>.

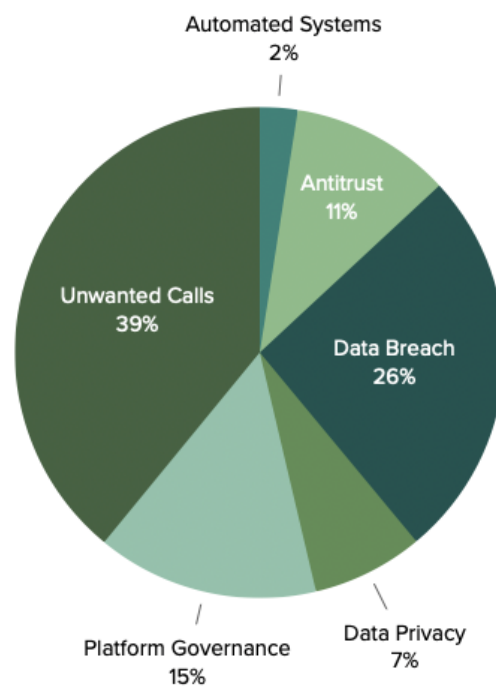
Scope

This report focuses on six narrow categories of tech-related consumer protection enforcement actions taken by State AGs against businesses from January 1, 2020, through December 31, 2024. We used multiple methodologies for organizing this data, discussed in the Methodology section immediately below. In the most expansive method, we considered enforcement actions to include not only lawsuits and settlements (e.g., Assurances of Voluntary Compliance), but also public announcements of investigations of named companies and letters to named companies that invoked a State AG's legal authorities. We further document announcements of cure letters, industry sweeps, or investigations in which no specific company was named in Appendices 4 and 5. We have excluded from this report's scope any non-enforcement actions, actions against non-corporate defendants, and actions outside the six listed categories.

The pie chart is green to signify that the dataset used is the Total Actions dataset. Total Actions also includes public letters and investigations in its count of enforcement actions, not merely cases and settlements. You can read more about the datasets underlying this report in the Methodology section.

The six Issue Categories making up the wedges of the pie chart are the primary taxonomy we use throughout this report for organizing State AG enforcement actions related to privacy harms. These Issue Categories are: Algorithms & Automated Systems (Automated Systems), Antitrust, Data Breach, Data Privacy, Platform Accountability & Governance (Platform Governance), and Unwanted Calls & Texts (Unwanted Calls).

TOTAL ACTIONS, BY ISSUE CATEGORY



We emphasize that the scope of this report is meant to illuminate one small portion of the work accomplished by State AGs, not to imply that their work is limited to what

is contained here. State AGs have a broad mandate that includes important enforcement work outside the scope of non-pecuniary privacy harms – within the consumer protection sphere (such as preventing fraud, prohibiting deceptive advertising unrelated to privacy harms, and promoting equitable broadband access), within the civil sphere more broadly (such as maintaining housing affordability), and within the criminal sphere. State AGs also undertake many non-enforcement-related activities not featured here – for example, this report does not include State AG amicus briefs, comments to federal regulators and legislatures, consumer education, and collaboration with state legislatures to enact new policies. See the Enforcement & Collaboration section below for more information about how we counted enforcement actions for purposes of this report.

This report does not suggest that issues that fall outside its scope are not serious harms, nor even that they are not consumer privacy harms. For example, we explicitly excluded COVID-19-related actions not because they do not pertain to privacy harms, but because we hoped that that pandemic represented highly anomalous circumstances.

We also limited the scope of this report by looking at the factual and legal allegations in each action, not merely deciding based on the industry of the defendant corporation. For example, the deceptive labeling in the TurboTax software case is not within the scope of the report, but the user interface thoroughly designed to thwart user choice in the AdoreMe subscription cancellation case is within scope. For the curious reader, we include via footnote below a brief and non-comprehensive list of tech-adjacent enforcement actions that are not within this report’s scope.¹³

¹³ See, e.g., Apple throttling iPhone performance; Frontier Communications charging for high-speed but delivering slow internet; Getaround using fake user profiles; social media platforms failing to police COVID-19 misinformation and disinformation; Hyundai and Kia security flaws; Meta intentionally violating campaign finance laws; Facebook committing securities fraud; criminal charges for voter intimidation robocalls; letters urging Meta to combat the spread of hate and disinformation online; collaboration between the FTC and the California Department of Financial Protection and Financial Innovation regarding violations of consumer financial protection laws; litigation surrounding the personal liability aspects of a 2019 order; deceptive I Heart Radio ads about smartphones; cryptocurrency fraud; burdensome cancellation processes that are not related to digital design; fake bids by online auction companies; websites impersonating toll booth agencies; telecommunications companies’ deceptive ad practices; deceptive emails and texts targeting small businesses and nonprofits; an individual who helped foreign scammers trick consumers into installing malware; telemarketing scams involving charitable contributions but no Do Not Call or robocall allegations, etc.

For purposes of this report, we froze what the state of state enforcement looked like as of December 31, 2024. This means that some cases have since progressed beyond what is reported here, and some additional states have since joined reported cases (i.e. beyond the states listed in this report).

While we offer our own limited analysis of trends and implications that can be drawn from the data, it was important to us in developing this report that the compiled dataset itself be able to serve as a useful resource for further external analysis,¹⁴ especially as a point of historical comparison as states continue to enact and develop their own comprehensive privacy laws. This is another reason why we have been thoughtful about and precise in articulating our scope and methodology.

Methodology

Our primary data-collection method for this report was reading through the press releases on each State AG's website for announcements related to publicly available enforcement actions that implicated privacy harms.¹⁵ In many instances, this required retrieving archived versions of these webpages via the Wayback Machine/Internet Archive and reaching out to local court clerks for the legal documents referenced. To ensure the most robust dataset possible, we shared an initial state-specific list with an attorney at each of the 56 relevant State AG offices to see if there were any additional enforcement actions that we would be able to include in the report. We also cross-referenced federal and multistate cases to build out the full list of each action in which a given state had been involved, even if that State AG had not published a press release about their involvement in the coordinated action and no attorney had offered it as a supplement to our initial list.

¹⁴ See Appendices 1, 2, 3, and 5.

¹⁵ We also checked this information against the National Association of Attorneys General (NAAG)'s Multistate Settlements Database. National Association of Attorneys General, *Multistate Statements Database*, <https://www.naag.org/news-resources/research-data/multistate-settlements-database> (last visited Oct. 1, 2025).

Explanation of Datasets

This report provides counts of enforcement actions in three separate datasets: Total Actions, Individual Cases, and Cases Grouped-by-Defendant/Misconduct (noted throughout the report as Cases Grouped-by-Def./Misconduct).

- The Total Actions dataset counts each individual state’s participation as a separate action (e.g., a single fifty-state multistate action would be counted fifty times); unlike the other two datasets, Total Actions also includes letters and investigations.¹⁶
- Individual Cases counts the same enforcement action only once, no matter how many states participated, and only counts cases and settlements.¹⁷
- Cases Grouped-by-Def./Misconduct combines distinct Cases (again meaning cases or settlements) that seem to pertain to very similar misconduct by the same defendant (e.g., ten states each filing separate cases against the same defendant for largely identical misconduct would be counted only once, not ten times, in this dataset).

In developing visualizations for the datasets in this report, we aimed to illustrate different types of enforcement strategies, whether enforcement was brought by a State AG working independently, or collaborating with other State AGs or Federal agencies. The chart below provides several hypothetical examples of how the data visualizations are impacted by the three different datasets we used for counting enforcement actions.

Hypothetical example	Total Actions	Individual Cases	Cases Grouped by Def./Misconduct
Fifty states sue defendant(s) in same lawsuit	50	1	1
Two states sue defendant(s) in same lawsuit	2	1	1
One state sues defendant(s) in one lawsuit	1	1	1
One state brings two distinct lawsuits against the same defendant	2	2	2
Two states sue defendant(s) in different lawsuits pertaining to similar misconduct	2	2	1
One state sues defendant(s) with federal agency	1	1	1

We use shades of green for data visualizations using the Total Actions dataset, blue for the Individual Cases dataset, and magenta for the Cases Grouped-by-

¹⁶ Find these in Appendix 2.

¹⁷ We anticipated that the Individual Cases counting methodology was likely to be the most useful dataset to report readers, so we have provided that dataset as Appendix 1.

Def./Misconduct dataset. Where data from multiple datasets are included in a single table, we use orange (for example, “Enforcement Action Counts, by Issue Category” below). The only exception to this color-coded system is the line graph later in this section that shows actions over time by Issue Category.

Issue Category	TOTAL ACTIONS	%
Automated Systems	58	2.49%
Antitrust	247	10.61%
Data Breach	602	25.86%
Data Privacy	171	7.35%
Platform Governance	341	14.65%
Unwanted Calls	909	39.05%
Grand Total	2328	100%

Issue Category	INDIVIDUAL CASES	%
Automated Systems	6	2.70%
Antitrust	15	6.76%
Data Breach	66	29.73%
Data Privacy	34	15.32%
Platform Governance	53	23.87%
Unwanted Calls	48	21.62%
Grand Total	222	100%

Issue Category	CASES GROUPED BY DEF./ MISCONDUCT	%
Automated Systems	6	3.70%
Antitrust	8	4.94%
Data Breach	63	38.89%
Data Privacy	25	15.43%
Platform Governance	18	11.11%
Unwanted Calls	42	25.93%
Grand Total	162	100%

The orange table below combines all the information from the green, blue, and magenta tables immediately above and illustrates the three datasets compared to one another. It emphasizes the importance of understanding which dataset was used to create a given data visualization. For example, the respective percentages of enforcement actions represented by each given Issue Category can vary significantly depending on which dataset is used.

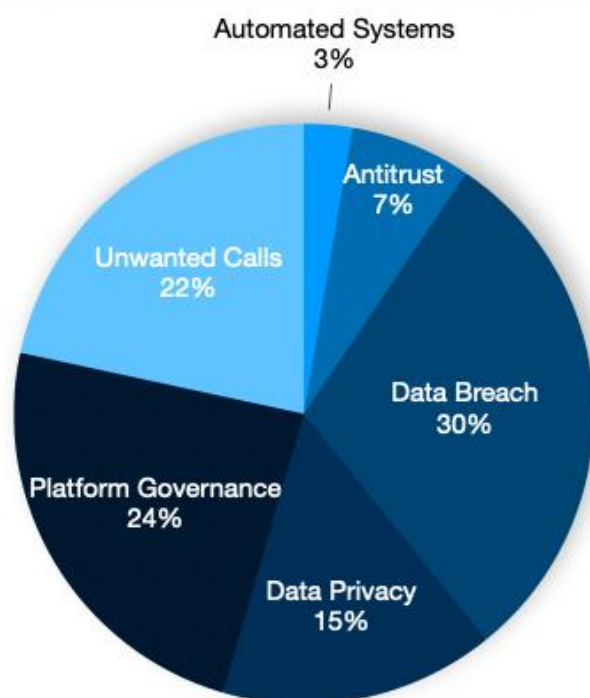
Enforcement Action Counts by Issue Category

Issue Category	Total Actions	%	Individual Cases	%	Grouped Cases	%
Automated Systems	58	2.49%	6	2.70%	6	3.70%
Antitrust	247	10.61%	15	6.76%	8	4.94%
Data Breach	602	25.86%	66	29.73%	63	38.89%
Data Privacy	171	7.35%	34	15.32%	25	15.43%
Platform Governance	341	14.65%	53	23.87%	18	11.11%
Unwanted Calls	909	39.05%	48	21.62%	42	25.93%
Grand Total	2328		222		162	

Note that the Total Action percentages are also represented in the green pie chart (“Total Actions, by Issue Category”) on pages 3 and 9, and the Individual Cases percentages are also represented in the blue pie chart (“Individual Cases, by Issue Category”) below, on page 15.

A Note About the Issue Categories Taxonomy

The pie chart immediately below illustrates the Individual Cases dataset by Issue Category. It is blue to signify that the dataset used is the Individual Cases dataset. As a reminder, the unit of measurement for the Individual Cases dataset is cases and settlements, it does not weigh how many State AGs were involved, and it does not count any letters or investigations.

INDIVIDUAL CASES, BY ISSUE CATEGORY

Some enforcement actions implicated multiple Issue Categories. We have included a brief Issue Category-specific Methodology subsection at the end of each Issue Category section that highlights the enforcement actions that implicate other Issue Categories (e.g., the Google Location settlements appear in the Data Privacy Issue Category, but in the Data Privacy Methodology subsection we note that those settlements could alternatively have been counted in the Platform Accountability & Governance Issue Category).¹⁸

Collaboration and Claims

In addition to counting the number of actions by Issue Category, this report also includes information about the extent to which State AGs worked together with one another and with federal agencies. It also includes a high-level description of what types of laws the State AGs allege the company violated.¹⁹

In reporting on Federal or Multistate participation within the datasets, we looked to the case caption where available. So even if a state indicated in its press release that it worked closely with the FTC, for example, if the FTC was not included in the case caption, we did not report it as “Fed.” nor as “Fed. & Multistate.” Similarly, if a state noted that it filed alongside other states, but the case caption only listed the one State

¹⁸ This subsection also highlights which enforcement actions we combined when using the Grouped-by-Def./Misconduct Cases method to count enforcement actions and which enforcement actions seemed to entail related activity from other state or federal agencies.

¹⁹ EPIC intends to publish analysis in a follow-up to this report that goes beyond these high-level descriptions and focuses specifically on the use of Unfairness authority across these same five years of privacy-related State AG enforcement actions.

AG, we generally listed it as “Single State” (meaning neither a multistate action nor an action involving a federal agency), not as “Multistate.”²⁰

In terms of Claims, this data reflects our best understanding based on the available documents about the enforcement actions. That means that we used the actual allegations from the complaint or the compliance language from the settlement-type document (e.g., an Assurance of Voluntary Compliance) to determine the type of Claim.²¹ We combined personal information protection and security breach notification statutes into a single category, “State PIP/Breach,” and combined UDAP and non-UDAP state consumer protection laws into “State Consumer Protection” because this is how State AGs have referred to their own legal authorities in settlements. We aggregated claims for the Grouped-by-Def./Misconduct Cases dataset.²²

Because letters and investigations often did not invoke specific legal authorities, and the relevant legal authorities could not always be reliably inferred, we did not include Claims information in Appendix 2 nor in the Total Actions dataset.²³

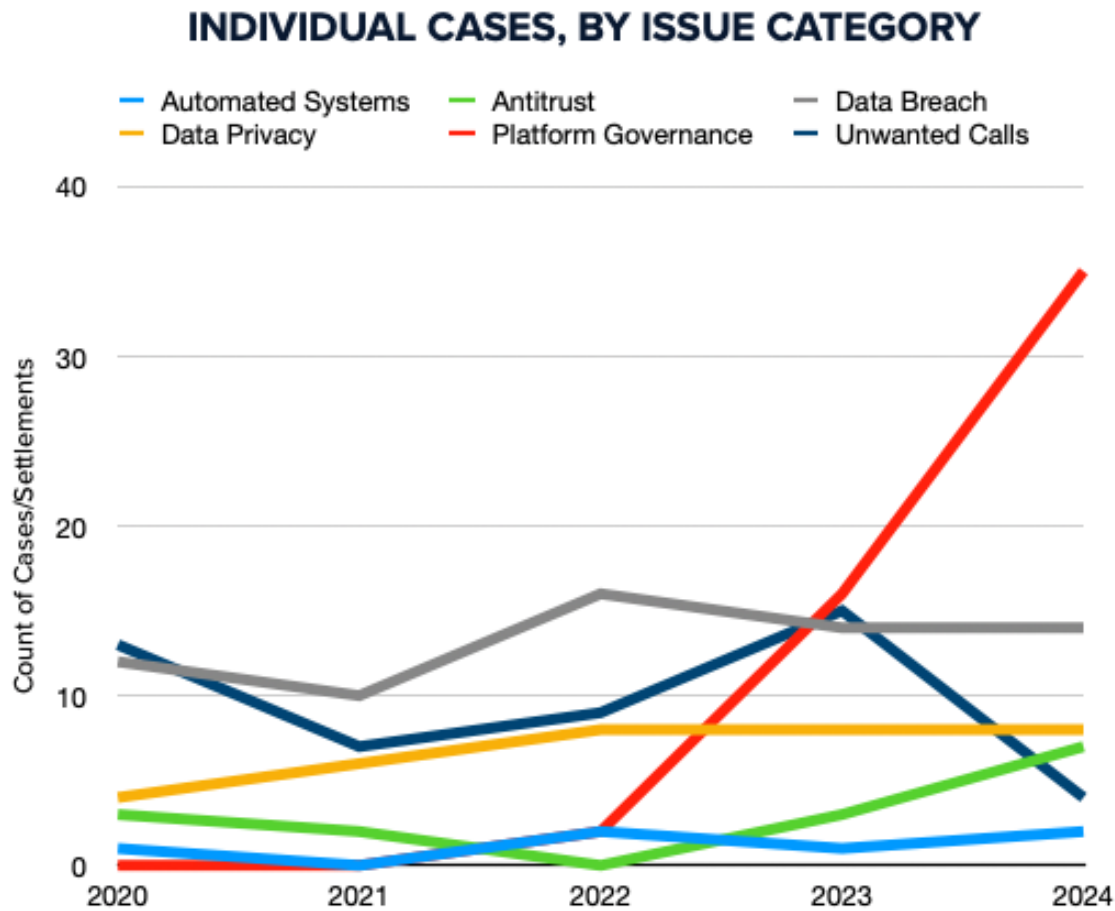
²⁰ In categorizing public settlements addressing the same alleged misconduct, even if the terms of the public settlement agreement did not explicitly reference corresponding settlements with other states, we exercised our judgment in counting some as “Multistate” rather than as “Single State.”

²¹ Sometimes the list of laws referenced in the settlement included more than those included in the initial complaint allegations, and in some instances this was likely the result of further investigation, e.g. HIPAA compliance referenced in the Blackbaud settlement but not in the initial complaint.

²² For example, if State A alleged violations of the State Consumer Protection law and Product Liability and Negligence claims, State B alleged State Consumer Protection violations and Public Nuisance claims, and State C alleged State Consumer Protection violations and Unjust Enrichment and Negligence claims, we would report Claims for that action in the Grouped-by-Def./Misconduct dataset as: State Consumer Protection, Product Liability, Negligence, Public Nuisance, and Unjust Enrichment.

²³ The Total Actions dataset is valuable in looking at the volume of enforcement actions a State AG has made public within each of the Issue Categories, including letters and investigations, and looking at examples of collaboration with other states and with federal agencies.

Report Timeframe: 2020-2024



The line graph above represents individual cases and settlements over time, from January 1, 2020, through December 31, 2024. (This graph is the one exception to our color-coded system based on dataset used, as in this specific instance graph readability demanded multiple contrasting colors; throughout the rest of this report visualizations from the Individual Cases dataset are blue.)

The charts and tables in this report are not intended to represent statistically valid inferences but rather to help paint a picture of what has occurred in recent history. For example, we did not limit our dataset to only enforcement actions that were **initiated** in

the 2020–2024 timeframe. Rather, we included settlements that occurred within that five-year span even if related State AG action was initiated prior to 2020.²⁴

When this report provides information about the year of an enforcement action, it typically refers to the first press release or court filing post-January 1, 2020 (e.g., a 2019 complaint that settles in 2021 would be listed as 2021). However, where an agency announced an investigation that later resulted in a complaint or settlement, we included the year of the complaint or settlement rather than the investigation announcement (e.g., an investigation announced in 2020 that resulted in an Assurance of Discontinuance in 2022 with no complaint filed would be listed as 2022). Additionally, as discussed in the Enforcement Actions & Collaboration section immediately below, in our Total Actions counting method, we did not count a State AG investigation for which there was a subsequent complaint or settlement by that State AG – we did not want to count different stages of the same enforcement process as distinct actions.²⁵ Finally, it is important to reiterate that not all AG investigations are public; this report only includes investigations for which there was a public notice.

²⁴ With one exception: we opted to exclude from this report the March 2020 Seventh Circuit appellate victory of State AGs, the FTC, and DOJ over DISH network, as that case was initially brought in 2009 and trial concluded in federal district court in 2017.

²⁵ To that end, we do include a publicly announced multistate investigation by a State AG for which we did not find any subsequent case or settlement by that specific State AG (even if, for example, a different State AG had reached a settlement subsequent to that multistate investigation).

Enforcement Actions and Collaboration

For purposes of this report, an “enforcement action” is more than mere advocacy; it is an invocation of authority by the State AG²⁶ to compel a corporation²⁷ to cease its misconduct.

Perhaps obviously, the data we collected for this report is limited to **public** enforcement actions—State AGs undertake many investigations of companies and meetings with companies to urge their compliance with consumer protection laws that are never publicized. For that reason, we could not include data about those non-public actions in this report.

State AGs have many enforcement tools at their disposal. Beyond litigation, these might include formal investigations, sometimes accompanied by a Civil Investigative Demand (CID); less formal inquiry letters which apply soft pressure in asking the company to describe its business practices; and cure letters, which identify violations and give the company an opportunity to correct the problem without either party needing to expend resources (or in the case of the company, risk public relations fallout) in litigation. Whether or not a State AG ever files a complaint in court, they may settle with the company directly.²⁸ A settlement usually entails the company committing to compliance with relevant laws (sometimes in very specific terms),²⁹ the State AG

²⁶ There are many other state-level entities that play a role in protecting consumers from privacy harms but are not State AGs and so are not included in this report (except to the extent that a State AG has partnered with them). These include the California Privacy Protection Agency, California Department of Financial Protection and Innovation, Commissioner of the Department of Consumer Protection in Connecticut, Executive Director of the State of Hawaii Office of Consumer Protection, New Jersey Division of Consumer Affairs, New York Department of Financial Services, and Utah Division of Consumer Protection.

²⁷ Because of that definition, although we applaud the DC AG’s lawsuit against Mark Zuckerberg—as personal liability for executives can often be a more effective deterrent to corporate misconduct than allegations against the company itself—it does not include Facebook/Meta as a defendant, meaning it is not a lawsuit against a company. It is therefore not included in any of this report’s datasets.

²⁸ The settlements we came across in compiling this report went by many names, including but not limited to Assurance of Voluntary Compliance, Assurance of Discontinuance, Consent Order, and Consent Judgment.

²⁹ These can include a commitment to establishing a data privacy or data security program.

offering a release from the risk of litigation for the alleged misconduct, and sometimes a monetary fine.³⁰

Scope and Methodology Related to Enforcement Actions

Whether any given public State AG action constitutes an enforcement action is an easy call in the case of complaints and settlements. However, amicus briefs and comments to federal regulators are not categorized here as enforcement actions. Categorizing letters from State AGs to specific companies required a bit more thought, as some letters were more like advocacy than enforcement. For example, the State AG letters warning credit card companies about their alleged misconduct with regard to tracking firearms purchases did meet our definition of an enforcement action, whereas the State AG letters encouraging those companies to stay their course was mere advocacy.

In the case of a relevant letter or investigation where the target company was named, this action was included in the Total Actions dataset (and so can be found in Appendix 2). Where no target company was explicitly named, the letter or investigation was not included in the Total Actions dataset. Knowing the defendant or target company was important to ensuring that different stages of the same enforcement effort were not being counted multiple times and also was important in determining whether a given action was more aptly described as a Multistate effort rather than an individual state effort (which we described in our datasets as “Single State”). For the rare instances in which we did not have enough information to determine which Issue Category an enforcement action fell under, or whether it seemed to be part of a collaboration with another state or with a federal agency, or whether the action may have occurred after December 31, 2024, we did not include it in our datasets and instead listed it as supplemental qualitative commentary in Appendix 4 or Appendix 5.

Additionally, we removed an investigation or letter from our Total Actions dataset if there was a subsequent and seemingly related Case³¹ brought by the same State AG included somewhere else in the Total Actions dataset. Many press releases about settlements in the Data Breach Issue Category, for example, noted that the settlement

³⁰ We considered a settlement to be an enforcement action but not a public announcement about the availability of consumer restitution funds (absent a corresponding settlement within the 2020–2024 timeframe).

³¹ We use “Case” to mean complaint or settlement.

represented the resolution of an investigation. We felt it inappropriate to count these actions twice (once for the investigation and once for the settlement). We applied that same rationale in other contexts, as well. For example, many states publicly announced that they had commenced an investigation into TikTok for platform features leading to addictive feeds for minors and subsequently brought litigation against TikTok for the same alleged misconduct. We only counted each State AG’s enforcement effort on a given topic once. The year we attribute to an enforcement action in our dataset is based on the date associated with the complaint or press release about the complaint (where there was a complaint after January 1, 2020); the date for the settlement (where there was not); and the date for the press release announcing the letter or investigation or other enforcement action (where there was no public settlement).

The two tables below present the number of enforcement actions, by Issue Category. We describe these Issue Categories in greater detail in the immediately subsequent section.

The green table, “Types of Enforcement Action by Issue Category”, provides an accounting of the investigations, letters, and Cases by Issue Category. It is built from the Total Actions dataset, as that is the only dataset that includes data on public investigations and letters.

Types of Enforcement Action by Issue Category

Total Actions	Investigations	%	Letters	%	Cases	%	Grand Total	%
Automated Systems	1	1.01%	2	0.20%	55	4.56%	58	2.49%
Antitrust	0	0.00%	0	0.00%	247	20.48%	247	10.61%
Data Breach	15	15.15%	23	2.25%	564	46.77%	602	25.86%
Data Privacy	0	0.00%	93	9.09%	78	6.47%	171	7.35%
Platform Governance	30	30.30%	194	18.96%	117	9.70%	341	14.65%
Unwanted Calls	53	53.54%	711	69.50%	145	12.02%	909	39.05%
Grand Total	99		1023		1206		2328	

The table below, “Cases and Settlements Counts by Issue Category,” only presents cases and settlements (not letters or investigations). It illustrates the importance of knowing which dataset is being used for any given chart, graph, or table, as the datasets count State AG enforcement activity differently.³² Note that the column for Cases in the green table above is identical to the Total Cases column in the orange table below.

Cases and Settlement Counts by Issue Category

Issue Category	TOTAL CASES	%	INDIVIDUAL CASES	%	GROUPED CASES	%
Automated Systems	55	4.56%	6	2.70%	6	3.70%
Antitrust	247	20.48%	15	6.76%	8	4.94%
Data Breach	564	46.77%	66	29.73%	63	38.89%
Data Privacy	78	6.47%	34	15.32%	25	15.43%
Platform Governance	117	9.70%	53	23.87%	18	11.11%
Unwanted Calls	145	12.02%	48	21.62%	42	25.93%
Grand Total	1206		222		162	

A Note About Collaboration

There are several metrics that we think are of interest to readers in these datasets, but one of the most interesting datapoints to EPIC is how State AGs work with other organizations—including other State AGs—to protect consumers from evolving privacy harms. As noted in the Methodology section above, we strived to include what was actually in the signature block in reporting on whether an enforcement action was:

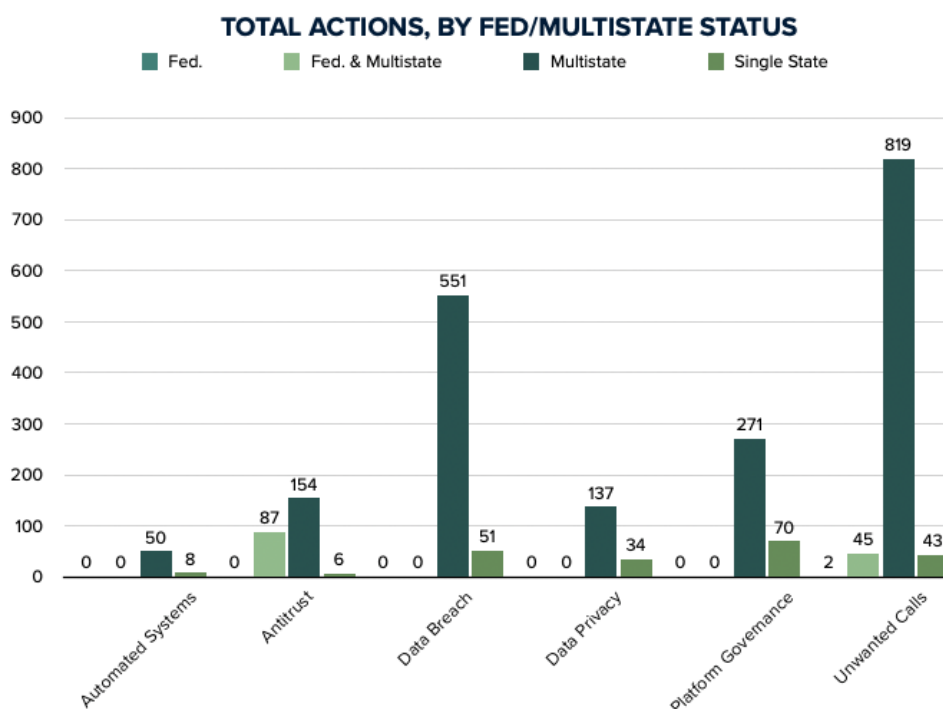
- “Multistate” – a coalition of two or more State AGs;
- “Single State” – meaning neither “Fed.” nor “Multistate”, i.e. the State AG seemed to pursue this enforcement action on their own;

³² These three datasets were explained more robustly in the Methodology section above.

- “Fed.” – a partnership between one State AG and a federal agency;³³ or
- “Fed. & Multistate” – a coalition of two or more State AGs working in partnership with one or more federal agencies.

Even if a State AG noted in its press release that it was coordinating with other agencies, we generally opted to report what was in the actual signature block.³⁴ We note in the Methodology subsection at the end of each Issue Category section where we came across indications of cooperation or ripple effects between federal and state agencies or between State AGs and other state agencies.

The green bar graph below, “Total Actions, by Fed/Multistate Status”, illustrates how often individual State AGs acted alone or worked with other state or federal partners, broken out by Issue Category. Because the graph is built from the Total Actions dataset, it gives greater weight to actions that involved more State AGs.



³³ This is not to be confused with “Fed. claims”, which we use to refer to a federal source of legal authority for the State AG’s enforcement action, e.g. HIPAA, COPPA, the Sherman Act, and the TSR. A State AG can allege that a company has violated a federal law without partnering with a federal agency in bringing the enforcement action.

³⁴ However, as noted in footnote 20 above, we exercised some judgment in counting settlements as “Multistate” when they did not explicitly reference very similar settlements reached with other State AGs.

The orange table below, “Enforcement Actions by Fed/Multistate Status,” again illustrates the difference between datasets in how the underlying enforcement activity is counted. A fifty-state Multistate coalition action, for instance, would only be counted once in the Individual Cases dataset or the Cases Grouped-by-Def./Misconduct dataset, as it was only one Case, however it would be counted fifty times in the Total Actions dataset, as fifty State AGs participated in the coalition.³⁵

Enforcement Actions by Fed/Multistate Status

	TOTAL Actions*	%	INDIVIDUAL Cases	%	Cases GROUPED by Def./ Misconduct	%
Fed.	2	0.09%	2	0.90%	2	1.23%
Fed. & Multistate	132	5.67%	8	3.60%	8	4.94%
Multistate	1982	85.14%	31	13.96%	29	17.90%
Single State	212	9.11%	181	81.53%	123	75.93%
Grand Total	2328		222		162	

**Recall that Total Actions include letters and investigations, not merely cases and settlements.*

Most obviously, public collaboration can take the form of a letter or lawsuit to which multiple enforcement entities have signed on. Sometimes, State AGs brought suits separately and their actions were subsequently joined. In the Google Search Antitrust litigation, for example, one coalition of states filed litigation along with the U.S. Department of Justice while another coalition of states filed without a federal partner; the court consolidated those two cases. In at least one instance, State AGs

³⁵ As a result, the percentage of actions with the “Multistate” or “Fed. & Multistate” status is significantly greater in the Total Actions dataset than in the other two datasets. The number of enforcement actions is identical for the “Fed.” status across all three datasets because that represents two distinct Cases each brought by one State AG in conjunction with a federal agency. The number of enforcement actions is slightly larger for the “Single State” status between the Individual Cases and the Total Actions datasets because the Total Actions dataset includes letters and investigations whereas the Individual Cases dataset only includes cases and settlements.

seemed to act jointly in pursuing an enforcement action, but one or more State AGs seemed to ultimately settle the matter separately from the rest of the coalition. Moreover, not all State AG collaboration is public; our report is limited to what was public.

In the context of the Unwanted Calls & Texts Issue Category specifically, AGs from all fifty states and DC joined the Anti-Robocall Task Force, and several AGs have signed a Memorandum of Understanding (MOU) with the FCC and/or joined the FTC’s “Operation Stop Scam Calls.” In the context of the Data Privacy Issue Category, several states signed MOUs with the FCC’s Personal Data Protection Task Force during the 2020–2024 period. Where these collaborations have resulted in public enforcement actions, they will appear in our report datasets, but where they have merely announced a partnership demonstrating enforcement priorities, we have not included them in our report datasets (but have compiled a non-exhaustive list for the curious reader in Appendix 4).

Less obviously, State AGs sometimes call attention to similar but not identical misconduct by the same defendant(s) at the same time, but do not do so in a single, joint public action. Because we do not have visibility into the extent to which these actions may have been coordinated, we reported them as “Single State” rather than as “Multistate”, but where the allegations have been too similar to ignore, we have combined them and counted them as a single enforcement action in our Cases Grouped-by-Def./Misconduct dataset.³⁶ This is most pronounced in the Platform Accountability & Governance Issue Category.

³⁶ As noted above, there is a Methodology subsection at the end of each Issue Category section that lists out what Individual Cases were combined in the Grouped-by-Def./Misconduct Cases dataset for that Issue Category.

IV. ISSUE CATEGORY TAXONOMY: SIX AREAS OF PRIVACY HARMS

As described above, this report concerns itself with privacy harms resulting from corporate misconduct. This is defined as instances in which a company was in some sense a custodian of consumer data, or otherwise had some obligation to consumers pertaining to data about them, and the resulting consumer harm was not merely pecuniary.³⁷ This is not to suggest that privacy harms are the only harms addressed by the State AG enforcement actions covered in this report, but State AG enforcement responses against these six areas of privacy harms are our focus.³⁸ After reviewing hundreds of legal documents, letters, public announcements of investigations, and published State AG reports, we developed the below taxonomy to organize and report on the substantive Issue Categories State AGs had addressed during the 2020–2024 period. Appendix 1 includes an action-by-action breakdown of Claims brought by State AGs within each Issue Category. Each of these Categories underscores the power imbalance between corporations and consumers, often further exploited by a company’s misuse of consumer data or technology.

Unwanted Calls & Texts (Unwanted Calls) enforcement actions are largely self-explanatory. The privacy harm in this Issue Category is often akin to the common law tort of intrusion upon seclusion, and several federal statutes and regulations are designed to protect consumers from it, in addition to state laws. Where State AGs have included allegations related to contacting consumers on a “Do Not Call” list or by using a prerecorded message, we have included those enforcement actions in this report.³⁹ Encouragingly, many of these enforcement actions have been brought against not the callers themselves but rather against the communications service providers who knowingly transmit (and likely profit from)⁴⁰ these illegal and unwanted calls and texts.

³⁷ This is one of several reasons why fraud, absent other allegations, is excluded from this report.

³⁸ For example, several Data Privacy enforcement actions pertain to improper disposal of medical waste containing protected data, which has broader implications than merely privacy harms.

³⁹ This is not to suggest that Caller ID spoofing or other forms of fraud or failure to register as a telemarketer, for example, have no consumer harm implications, but they fall outside the scope of this report.

⁴⁰ EPIC & Nat’l Consumer Law Ctr. (NCLC), *Scam Robocalls: Telecom Providers Profit*, 11-18 (Jun. 2022), <https://epic.org/documents/scam-robocalls-telecom-providers-profit/> [hereinafter *Scam Robocalls*].

Data Breach enforcement actions address privacy harms that are often akin to the common law tort of negligence. In negligence, the defendant is alleged to have owed a duty of care that they failed to fulfill, resulting in some kind of harm. Fortunately, many State AG enforcement actions include allegations of inadequate company data security practices; unfortunately, some only allege untimely notification to consumers after a breach occurred. Despite the numerous data breach laws currently on the books, companies still do not necessarily have sufficient financial incentive to adequately protect consumer data from unauthorized access. The nefarious, infiltrating hacker is likely the image that comes to mind when thinking about data breaches, but other events such as insecure disposal of data could also result in a breach. Consumers often have no meaningful choice but to trust whatever safeguards a company has put in place to prevent unauthorized access to consumer data. Although in a sense the company is itself also a victim when a data breach occurs, the company has often made its own proverbial bed in that regard by failing to put basic data security safeguards in place.

Antitrust enforcement actions address privacy harms flowing from anti-competitive conduct related to consolidating consumer data or monopolistic behavior involving consumer data. Antitrust law is premised on the idea that a healthy marketplace is one in which competition flourishes and that concentration of power or resources (such as consumer data) within a single company or very small group of companies is a threat to competition. Some State AGs pursue antitrust enforcement through state-level antitrust laws, state consumer protection laws, or federal laws like the Sherman or Clayton Acts.

Data Privacy enforcement actions pertain to wrongful collection or wrongful use of consumer data. This is distinct from the Data Breach Issue Category in that a company generally intends (and likely profits from) the collection or misuse of the consumer data at issue in a Data Privacy enforcement action. Some states have enacted strong comprehensive privacy laws which their State AGs (and ideally also private litigants) can enforce. Unfortunately, many states have passed performative, industry-friendly laws;⁴¹ have passed only sector-specific privacy laws (e.g., health or biometric privacy); or have not passed any legislation meaningful related to consumer privacy at all.⁴² State

⁴¹ EPIC, *The State of Privacy 2025: How State “Privacy” Laws Fail to Protect Privacy and What They Can Do Better* (Jan. 2025), <https://epic.org/state-of-privacy-2025>.

⁴² We encourage readers to skim the list of state laws provided in Appendix 3.

AGs can also enforce violations of certain federal sector-specific privacy laws, such as HIPAA and the Children’s Online Privacy Protection Act (COPPA).

Platform Accountability & Governance (Platform Governance) enforcement actions address privacy harms from platform features or design that lessen consumer choice and autonomy or expose consumers to other online harms.⁴³ This could be the result of manipulative design features (sometimes called “dark patterns”) that can obscure user choice or maximize engagement on social media platforms. Enforcement actions in the Platform Accountability & Governance Issue Category often rely on broad enforcement authority from state consumer protection statutes or the common law because state and federal laws have not provided more specific enforcement authority at this point concerning platform design. Even though more state legislatures began to pass privacy laws in the 2020s, many of those laws did not go into effect until after 2024. This section therefore provides a snapshot of the authorities that AGs could use to bring enforcement actions against platforms before many of those newer state privacy laws went into effect.

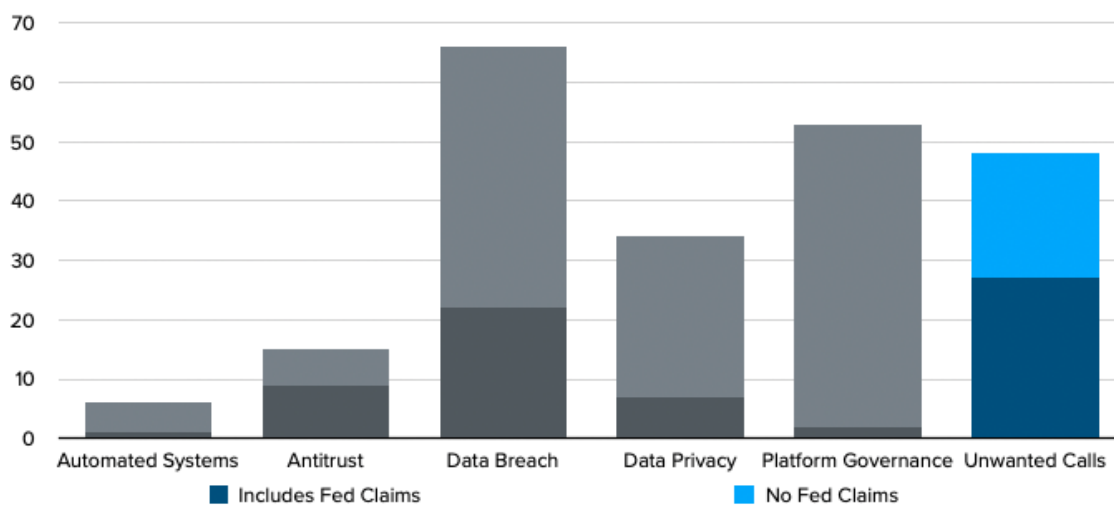
Algorithms & Automated Systems (Automated Systems) enforcement actions address privacy harms that occur in the process of making automated determinations about a consumer. This can include facial recognition technology, tenant screening reports, and coding errors that promulgate inaccurate information about consumers. As with the Platform Accountability & Governance Issue Category, it was rare for there to be existing on-point statutes for State AGs to rely upon. Indeed, it was even less common for State AGs to bring enforcement actions in this Issue Category at all during the 2020–2024 time period. We anticipate that this will be a more active Issue Category for State AG enforcement actions in the future, and so we have opted to include it in this report despite the comparatively small volume of relevant enforcement actions.

⁴³ However, misinformation and disinformation are outside the scope of this report, as they pertain more to deceptive statements made to consumers than to harms resulting from misuse of consumer data.



Unwanted Calls & Texts

INDIVIDUAL CASES BY CATEGORY



Overview of Enforcement Actions in Unwanted Calls and Texts

Perhaps the most universally relatable source of modern privacy harms is still—decades later—the unwanted call or text, which transforms a device intended to make our lives easier and more connected instead into an instrument of torment and antipathy. The (now somewhat antiquated) words of Sen. Hollings in support of enacting the Telephone Consumer Protection Act (TCPA) capture the familiar consumer experience of an unrelenting stream of calls and texts: “Computerized telephone calls are the scourge of modern civilization. They wake us up in the morning; they interrupt our dinner at night; they force the sick and elderly out of bed; they hound us until we want to rip the telephone right out of the wall.”⁴⁴

⁴⁴ 137 Cong. Rec. S16204 at *S16205-S16206, 1991 WL 229525 (Nov. 7, 1991) (Remarks of Sen. E. Hollings).

As Justice Kavanaugh observed in 2020: “Americans passionately disagree about many things. But they are largely united in their disdain for robocalls.”⁴⁵ There are a plethora of statutes and regulations pertaining to telemarketing at the state and federal level, some of which vary by state, meaning State AGs have a diverse set of tools for deterring a bad actor from continued misconduct.⁴⁶ At the intersection of State AG enforcement actions and the substantive scope of this report, however, are only two types of unwanted calls or texts that implicate privacy harms: those sent using a prerecorded message, and those sent to individuals on a Do Not Call list.⁴⁷ Enforcement actions against these two types of calls are largely carried out by State AGs using their authorities under the TCPA, the Telemarketing Sales Rule (TSR), and various state telemarketing statutes.

But these calls and texts could not reach consumers were it not for complicit and complacent voice service providers willing to transmit junk and scam communications. In a mid-2022 publication focusing specifically on scam⁴⁸ robocalls, EPIC and the National Consumer Law Center reported that Americans collectively receive 33 million scam robocalls every **day** and are defrauded of tens of **billions** of dollars **each** year.⁴⁹ It noted that, in many instances, voice service providers were financially incentivized to transmit these dangerous calls despite existing laws and consumer frustrations.⁵⁰ Both federal and state enforcement agencies have taken a closer look at the companies facilitating these calls, but no enforcer has yet been aggressive enough to stop these calls and texts completely.

⁴⁵ *Barr v. Am. Ass’n of Political Consultants, Inc.*, 591 U.S. 610, 613 (2020).

⁴⁶ These can include failure to register as a telemarketer, failure to maintain a license or bond, fraudulent solicitations seemingly on behalf of a charitable organization, and more.

⁴⁷ This can be either a list internal to the company or the National Do Not Call Registry (<https://www.donotcall.gov/>). We would note that calls at an unreasonable hour do not fall under either of these categories and would also represent a source of privacy harm – however we did not notice any AG claims based solely on this misconduct. Similarly, call or text exchanges during which the called consumer is denied the ability to opt out of future contact quickly and easily would also implicate a source of privacy harm but did not appear in our research. We did come across two Cases alleging that a company exceeded a statutory maximum number of calls within a set time period but opted not to include them. See Appendix 5.

⁴⁸ “Scam” included fraud but did not include otherwise unwanted telemarketing or other spam calls or texts, automated or otherwise.

⁴⁹ EPIC & NCLC, *Scam Robocalls* at 11-18. EPIC and NCLC anticipate publishing a follow up to that report in 2026.

⁵⁰ Providers are paid based on the volume of traffic they transmit. Read more in EPIC & NCLC, *Scam Robocalls* at 11-18.

There are a number of reasons why solely going after the bad actors calling consumers has proven ineffective over the past several decades. Some callers are beyond state (or even federal) agency jurisdiction; some are judgment-proof, meaning that fines are not an effective deterrent; and some are part of larger networks so that shutting down one operation does not meaningfully disable the rest of the enterprise (e.g., the company can just hire another telemarketing firm to perform the same misconduct). As a result, State AGs have had to find alternative angles from which to address the problem.

Collaboration, either with federal agencies, or with sister State AGs, is one such alternative. State AGs have collaborated with the Federal Communications Commission (FCC) and the Federal Trade Commission (FTC) at a high level on the issue of unwanted calls and texts.⁵¹ Indeed, the **only** examples we found in the 2020–2024 period of a single State AG partnering with a federal agency⁵² occurred within the Unwanted Calls & Texts Issue Category.⁵³ This is significant, because in no other Issue Category did we find any examples of a State AG working with a federal agency outside the context of a multistate coalition. State AGs also partner with each other. The Anti-Robocall Task Force (“ARTF” or “Task Force”),⁵⁴ a collaborative effort that includes 50 States and DC, was formed in 2022; the ARTF announced that it had sent twenty Civil Investigative Demands (CIDs)⁵⁵ to gateway providers⁵⁶ in the same press release that it announced its existence.⁵⁷

⁵¹ Find examples in Appendix 4.

⁵² As opposed to a multistate coalition of states partnering with a federal agency, which was more common, for example, in the Antitrust Issue Category.

⁵³ This was Ohio and Arizona, see page 34 below. There are examples in other Issue Categories of multistate coalitions of states working with one or more federal agencies, but no other examples of a lone state working with one or more federal agencies.

⁵⁴ Alternatively called the “Anti-Robocall Litigation Task Force.” Anti-Robocall Litigation Task Force, *Warning Notices*, <https://ncdoj.gov/protecting-consumers/telephones-telemarketing/fighting-robocalls/warning-notices/> [hereinafter Task Force Notices].

⁵⁵ Think of these as a State AG subpoena; we counted CIDs as Investigations in the Total Actions dataset where we knew the recipient. However, the Anti-Robocall Task Force has not made public the recipients of all of the 20 CIDs sent at the Task Force’s inception; we’ve noted this generally in Appendix 4.

⁵⁶ A call can be transmitted through multiple voice service providers and intermediary providers in traveling from the originating caller to the called party. When a call is routed into the United States from abroad, the company that brings that call onto the U.S. phone network is known as a gateway provider.

⁵⁷ See Task Force Notices. You can read more about this in Appendix 4.

Another alternative is exploring other companies' liability for the call (apart from the telemarketer, for instance). State AGs have several statutory tools at their disposal for policing unwanted calls. Because many privacy laws and regulations are already well-established in the Unwanted Calls & Texts Issue Category, calling someone without their consent can be a relatively clear grounds for liability. In the case of telemarketing, this can include vicarious liability for the company on whose behalf the calls were made. It can also include the lead generators who obtain consumer consents for one purpose but then provide them to callers for a different purpose.⁵⁸ Regardless of whether the unwanted calls or texts are telemarketing spam or outright scams, state and federal enforcers have also successfully⁵⁹ established liability for the voice service providers who transmit the high volume of calls despite receiving numerous alerts⁶⁰ of the harmful nature of the traffic they are profiting from sending.⁶¹ We will explain more about these alerts in the case studies below.

State AGs are practiced at bringing enforcement actions against this type of misconduct and so have been very active in responding to unwanted calls and texts. Actions primarily addressing Unwanted Calls & Texts comprised 22% of Individual Cases and 39% of Total Actions for the universe of 2020–2024 enforcement actions we reviewed.⁶²

The extent to which State AGs seem to collaborate with each other depends on the dataset used. Looking at Individual Cases,⁶³ it appears the vast majority of Unwanted Calls & Texts Cases⁶⁴ are Single State actions (88%).⁶⁵

⁵⁸ For this reason, some of the Cases in this Issue Category could also be listed in the Data Privacy Category. As one example, filling out a webform to be contacted about diabetes treatment should not result in the consumer being bombarded with robocalls with cruise trip offers.

⁵⁹ *But see* Statement of Commissioner Rebecca Kelly Slaughter, *Regarding the Presentation on the Telemarketing Sale Rule Amendments As Prepared for Delivery*, FTC Open Meeting 2 (Mar. 21, 2024), https://www.ftc.gov/system/files/ftc_gov/pdf/March24OCMTSRStatementSlaughterFinal_0.pdf.

⁶⁰ Or themselves using non-content-based analytics to detect suspicious caller activity.

⁶¹ *See* EPIC & NCLC, *Scam Robocalls supra* note 40 at 11-18. EPIC and NCLC will revisit these issues in a 2026 update to that 2022 report.

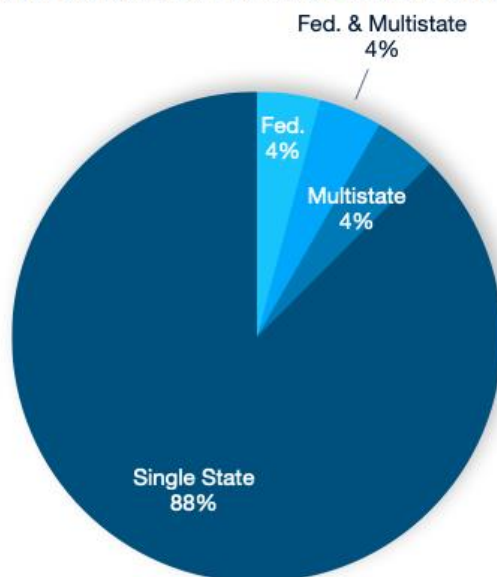
⁶² Recall that the Total Actions dataset includes letters and investigations, not merely cases and settlements.

⁶³ We have provided this dataset in Appendix 1.

⁶⁴ Recall "Case" when capitalized in this report means case or settlement (including settlements that were resolved administratively).

⁶⁵ Individual Cases and Grouped-by-Def./Misconduct Cases both yield 85.7% or higher.

**INDIVIDUAL UNWANTED CALLS CASES/
SETTLEMENTS, BY FED/MULTISTATE STATUS**

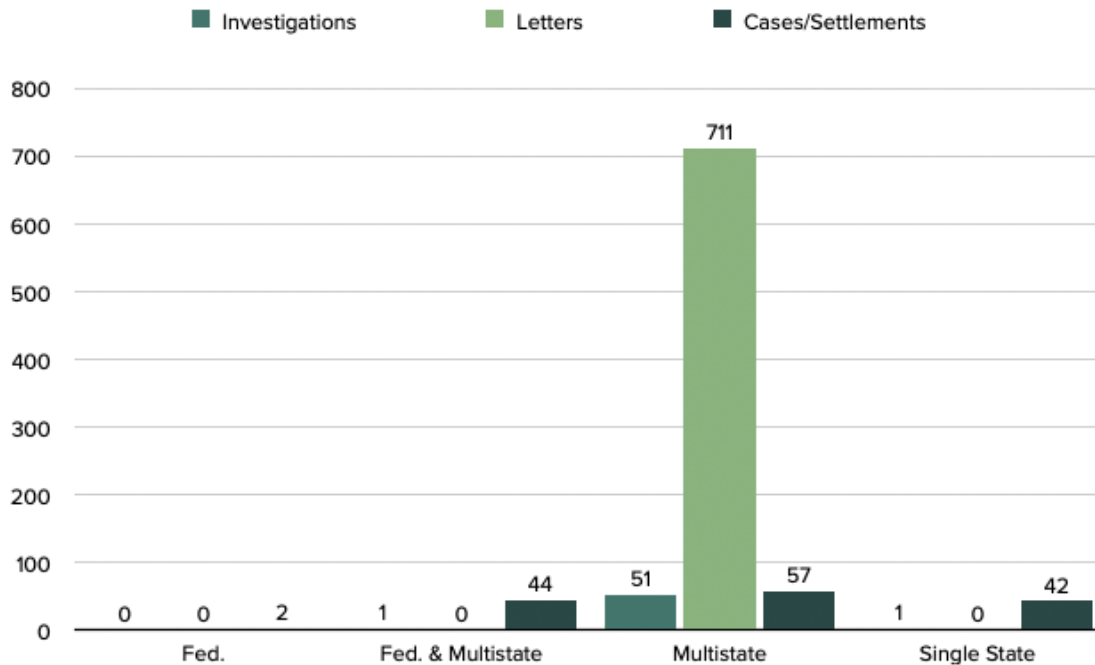


However, measuring State AG participation by each State AG (as in the Total Actions dataset) rather than by each Case (as in the Individual Cases dataset) results in Multistate collaborations constituting a larger percentage of enforcement actions, as each State AG's participation in a Multistate is weighed towards Multistate collaboration.⁶⁶ For example, 40 State AGs participated in the Multistate case brought along with the FTC against ACS;⁶⁷ the Multistate case against Avid involved 49 State AGs. Moreover, when Total Actions, which includes Letters and Investigations, not merely Cases, are considered, Single State actions only comprise 4.8% of Unwanted Calls & Texts enforcement actions. This significant shift of Single State actions between this report's Individual Cases (more than 85%) and Total Actions (less than 5%) datasets is largely due to the efforts of the Anti-Robocall Task Force. The Task Force sent more than a dozen warning letters, each of which counted as a Multistate action by 51 State AGs. Per the Methodology for our Total Actions dataset, twelve or more actions each brought by 51 State AGs amounts to 600+ enforcement actions.

⁶⁶ The Individual Cases dataset counts a Multistate coalition as a single instance of Multistate enforcement because that dataset only counts each Case once. The Total Actions dataset counts a Multistate coalition a number of times equal to the number of State AGs participating.

⁶⁷ Perhaps obviously, the ACS Case was counted as "Fed. & Multistate."

TOTAL UNWANTED CALLS & TEXTS ACTIONS, BY FED/MULTISTATE STATUS AND ENFORCEMENT TYPE



There were two cases that a lone state brought along with the FTC: Ohio brought the Globex and Educare case, and Arizona brought the Solar XChange case. The sole Single State investigation in the Unwanted Calls & Texts Issue Category was Michigan's subpoena sent to ThinQ; the sole Fed. & Multistate was Lingo by New Hampshire.⁶⁸

As noted above, State AGs held different types of companies responsible for their respective roles in harassing consumers with illegal call or text campaigns. The below table represents all Cases Grouped-by-Def./Misconduct, as well as distinct letters (i.e., counting each letter once no matter how many states sent it) in the Unwanted Calls & Texts Issue Category, organized by what type of company the State AG attempted to hold accountable.

⁶⁸ Because we do not count the same action twice, we counted this subpoena for Michigan but not the warning letter sent to ThinQ on Michigan's behalf by the Anti-Robocall Task Force, similarly the one sent to Lingo on New Hampshire's behalf; we continued to count the warning letter for each of the other State AGs participating in the Task Force under Multistate letters in the bar graph above.

Unwanted Calls & Texts Enforcement Target Includes	Count of Cases Grouped-by-Def./ Misconduct	Count of Distinct Letters ⁶⁹
Caller (if different from Beneficiary Company)	11	0
Beneficiary Company	16	0
Lead Generator	1	0
Voice Service Provider	13	15
Grand Total	41	15

This table suggests that approximately one-third of Cases (thirteen out of forty-one) and half of all enforcement actions (twenty-eight out of fifty-six) targeted the provider rather than the caller or beneficiary company. These providers transmitted illegal calls despite having enough information to know better.

Types of Claims in Unwanted Calls and Texts Cases

What legal authorities a State AG relies upon in their Cases is also informative for those interested in reducing the privacy harms from Unwanted Calls & Texts. This query includes whether the State AG's allegations (or compliance requirements) include federal claims or State Consumer Protection (SCP) law claims.

In terms of legal bases for enforcement,⁷⁰ State AGs can sue under the Telephone Consumer Protection Act (TCPA) and Telemarketing Sales Rule (TSR), as well as under certain FCC regulations – in addition to using their own State Telemarketing and State Consumer Protection laws.⁷¹ The TSR is particularly interesting because it enables the State AG to bring claims for “assisting and facilitating” in illegal call campaigns; this

⁶⁹ This table represents distinct letters or investigations; it does **not** count each State AG's participation individually, as we typically do in the Total Actions dataset. As with the rest of this report, in this table we do not count a letter or investigation if there was a subsequent, related case or settlement within the 2020–2024 time period.

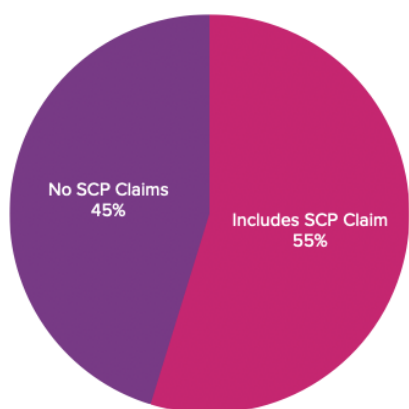
⁷⁰ Note that a legal basis for enforcement is not the same thing as type of enforcement action. When we say legal basis, we mean the claims that the State AG uses to describe the company's misconduct, for instance violating a specific law like the TCPA. When we say type of enforcement action, we mean letter, investigation, case, settlement, etc. Read more in the Enforcement Actions and Collaboration section.

⁷¹ See Appendix 3 for a non-exhaustive list of relevant state laws.

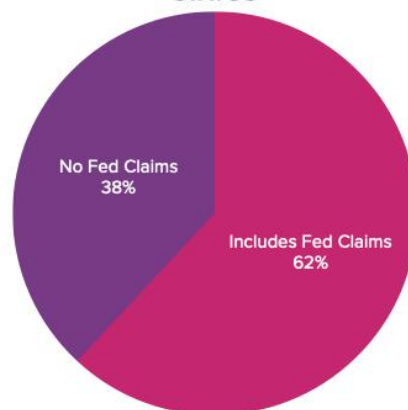
can be particularly useful for going after entities knowingly profiting from illegal call campaigns even if they aren't the entities actually making the calls themselves.

We used the Cases Grouped-by-Def./Misconduct dataset for the two pie charts below, as State AGs brought numerous Single State Cases against MV Realty and we did not want to give the details of those Cases disproportionate weight by counting each one separately.

**UNWANTED CALLS IN GROUPED-BY-DEF./
MISCONDUCT CASES DATASET, BY STATE
CONSUMER PROTECTION (SCP) CLAIM STATUS**



**UNWANTED CALLS IN GROUPED-BY-DEF./
MISCONDUCT CASES DATASET, BY FED CLAIM
STATUS**



Common bases for State AG enforcement included State Consumer Protection (SCP) and State Telemarketing law claims – 55% of Unwanted Calls & Texts enforcement actions invoked a State Consumer Protection law.⁷² Significantly more than half (62%) of State AG Unwanted Calls & Texts Cases Grouped-by-Def./Misconduct included federal claims (e.g. TCPA or TSR).⁷³

There is a comparatively high percentage of Cases⁷⁴ in the Unwanted Calls & Texts Issue Category that do not include any State Consumer Protection law claims, coupled with a comparatively high percentage of Cases that include federal claims. This seems to suggest that State AGs feel comfortable relying upon causes of action other than State Consumer Protection law – for example, by alleging violations of federal law – to

⁷² One enforcement action can invoke multiple federal and state authorities. This percentage was 56% for Individual Cases and 55% for Cases Grouped-by-Def./Misconduct in the Unwanted Calls & Texts Issue Category.

⁷³ For Individual Cases, this percentage was still well over half, at 56%.

⁷⁴ Recall, “Cases” means cases and settlements.

combat privacy harms that result from companies disregarding Do Not Call requests and sending prerecorded messages without adequate consumer consent.

On the other hand, some State AGs seem to be taking the opportunity to leverage State Consumer Protection law claims to develop stronger consumer protection caselaw in their jurisdiction, even where the State AG can establish liability without articulating free-standing State Consumer Protection law violations. For example, in many instances a violation of the TSR is *per se* simultaneously a State Consumer Protection law violation. Moreover, the TSR itself establishes liability for assisting or facilitating illegal calls. Despite this, several states explicitly cited to a company providing tools to those making illegal telemarketing calls as also violating its State Consumer Protection law. This suggests that State AGs may be seeking to develop theories of “assisting or facilitating” or “means and instrumentalities” liability independent of liability under the TSR.⁷⁵

Some states, like Kansas, Ohio, Pennsylvania, and Vermont, regularly brought enforcement actions for Unwanted Calls & Texts individually, rather than through a jointly captioned Multistate action. Washington and New York also brought two individual Unwanted Calls & Texts enforcement actions in the 2020–2024 time period.

Unwanted Calls Case Studies

Because pursuing the caller directly can be fruitless and inefficient, federal and state enforcers have explored other methods for interrupting the torrent of unwanted calls and texts bombarding Americans every day. These methods include taking to task the voice service providers profiting from transmitting call traffic that is likely illegal. While State AGs did bring cases directly against fraudsters,⁷⁶ telemarketers, and the companies on whose behalf telemarketers made illegal calls during the 2020–2024 time period, in the case studies below we feature enforcement actions brought against providers transmitting calls. These calls cannot reach consumers without a provider willing to transmit them. In all four instances, the company being targeted is not the scam caller but rather the phone provider who is – at best recklessly but perhaps knowingly – transmitting high volumes of scam robocalls from fraudsters to

⁷⁵ EPIC supports these approaches, as we think such a theory will be a useful tool in a State AG’s toolbox for combatting privacy harms, especially outside the context of Unwanted Calls & Texts.

⁷⁶ As a reminder, enforcement actions that allege fraud without any allegation of robocalls or Do Not Call list violations are outside the scope of this report.

consumers.⁷⁷ State AGs’ enforcement tools can include sending a CID, sending a warning letter, and pursuing a Case. We’ve featured several examples of warning letters and Cases below.

The first action featured below is a 2020 settlement between one State AG and one Voice over Internet Protocol (VoIP) provider, All Access Telecom. The second and third actions are warning letters sent by the Anti-Robocall Litigation Task Force that simultaneously sent several other warning letters in an enforcement push; one of the two featured letters was sent to All Access Telecom (again), the other to Telcast Network. The fourth enforcement action is a case brought by 49 State AGs (nearly the entirety of the membership of the Task Force), but against a different, single provider, Avid Telecom.

All Access Telecom Single State Settlement

In 2020, the Michigan AG’s office determined that at least one scam robocall pretending to be the Social Security Administration had reached a Michigan consumer after being transmitted by All Access Telecom. Scam robocall campaigns often involve sending millions of identical calls simultaneously,⁷⁸ so this was likely not a lone scam call. The AG and the company agreed to a monetary fine and to injunctive relief compelling the company to implement more meaningful review and safeguards around whom it accepts calls from in the future.

	All Access Telecom
Company Size	Over 100 wholesale customers nationwide ⁷⁹
Type of Illegal Call	Social Security Administration scam
AGs Involved	Michigan
AG Authorities Involved	TSR, State telemarketing, SCP
Settlement Terms/Relief	\$20k, must conduct annual “know-your-customer” reviews of all existing and prospective customers (including industry ratings, regulatory filings, and legal histories); prohibited from accepting or retaining customers who cannot comply with Caller ID attestation protocols

⁷⁷ Read more about this dynamic in EPIC & NCLC, *Scam Robocalls*, *supra* note 40.

⁷⁸ *See id.*

⁷⁹ *About Us*, All Access Telecom, <https://www.allaccesstelecom.com/about/> (last visited Oct. 1, 2025).

All Access Telecom and Telcast Network Task Force Letters

Not every enforcement action is a complaint or a settlement.⁸⁰ In November 2023, the AG Anti-Robocall Litigation Task Force sent a warning letter to All Access Telecom, as well as to seven other providers.⁸¹ The contents of these warning letters are largely the same, and they each note that the recipient was one of the twenty gateway providers who received a CID at the inception of the Task Force more than a year earlier in August 2022.

The contents of the letters – and the fact that the Task Force picked these eight providers for warning letters rather than all twenty who received CIDs – suggests that these were likely among the most egregious offenders continuing to transmit illegal robocalls,⁸² **even after** receiving a CID about their potential misconduct. We compare the Task Force’s letter to All Access with its letter to Telcast Network, another provider who received a warning letter in the same enforcement push, to highlight the different factual sources State AGs can use when investigating bad actors facilitating privacy harms in the Unwanted Calls & Texts Issue Category.

To explain some of the information in the chart below:

- As noted above, Civil Investigative Demands (CIDs) are a type of subpoena State AGs can use to gather information from the target of a potential investigation or other enforcement action.
- Tracebacks are the result of a request to determine what “path” of telecom providers an illegal robocall passed through on its way from the fraudster to the called party. Each traceback request likely represents hundreds if not millions of other identical robocalls sent as part of the same campaign.
- ZipDX’s RRAPTOR is a separate method for detecting illegal call campaigns which uses its own network of phone numbers, most of which are registered on the National Do Not Call Registry, to obtain call and network information. This includes how many phone numbers were used to transmit

⁸⁰ Appendix 1 only contains complaints and settlements. However, Appendix 2 includes other actions such as letters and investigations.

⁸¹ See Task Force Notices. Although it is outside the temporal scope of this report, notably in 2025 a “second and final” warning letter was sent to the same eight companies. See, e.g., Letter to Lamar Carter, CEO All Access Telecom, Inc., from Tracy Nayer, Special Deputy Attorney General, North Carolina Dep’t of Justice (Apr. 9, 2025), <https://ncdoj.gov/wp-content/uploads/2025/04/State-AG-Task-Force-2nd-NOTICE-Letter-to-ALL-ACCESS-Apr-2025.pdf>.

⁸² Read more about the ecosystem of providers in EPIC & NCLC, *Scam Robocalls*, *supra* note 40.

illegal call campaigns through the same provider's networks,⁸³ as the Task Force referenced in its letter to Telcast Network (see below). The number of unique calling numbers exhibiting indicia of illegal calls can be used to demonstrate that the provider (here, Telcast) could not fail to notice what kind of illegal traffic they were profiting from transmitting.

	All Access Telecom ⁸⁴	Telcast Network ⁸⁵
Traceback Requests Received in Total, from approximately January 2020 to October 2023	1,258	617
Traceback Requests Received <u>Even After</u> Receiving a CID About Transmitting Illegal Calls, from approximately August 2022 to October 2023	More than 173 ⁸⁶	More than 167 ⁸⁷
ZipDX RRAPTOR Illegal Robocall Campaign Detection	No information provided	57,182 unique calling numbers which exhibit indicia of illegal calls
Types of Illegal Calls	Government imposters and impersonations, Amazon suspicious charges, credit card "courtesy" calls, credit card interest rate	Financial and utility impersonations, utilities rebate, Medicare advisor, Amazon, tax relief, and others

⁸³ Read more about how call paths, tracebacks, and the STIR/SHAKEN protocol work in EPIC & NCLC, *Scam Robocalls*, *supra* note 40.

⁸⁴ Letter to Lamar Carter, CEO All Access Telecom, Inc., from Tracy Nayer, Special Deputy Attorney General, North Carolina Dep't of Justice (Nov. 3, 2023), <https://ncdoj.gov/wp-content/uploads/2023/11/State-AG-Task-Force-NOTICE-Letter-to-ALL-ACCESS.pdf>.

⁸⁵ Letter to Talal Khalid, CEO Telcast Network LLC, from Tracy Nayer, Special Deputy Attorney General, North Carolina Dep't of Justice (Nov. 3, 2023), <https://ncdoj.gov/wp-content/uploads/2023/11/State-AG-Task-Force-NOTICE-Letter-to-TELCAST.pdf>.

⁸⁶ The letter says that "a majority of the more than 346 traceback notices sent to All Access since August 2022 were issued after the Task Force issued its CID to All Access," which we interpret to mean "more than 173." Recall that a single traceback request can represent hundreds if not millions of illegal calls.

⁸⁷ Similarly, the letter indicates "a majority" of the more than 335 traceback notices sent to Telcast occurred even after it received the Task Force's CID. We interpret this to mean "more than 167."

	reductions, and others	
AGs Involved	50 states and DC	
Relevant AG Authorities Involved⁸⁸	TSR, TCPA, “respective state laws” (state telemarketing, SCP)	
Threat of Litigation	“If further investigation shows that your client continues to assist its customers by initiating and/or transmitting call traffic not dissimilar from the traffic highlighted in this Notice, the Task Force may decide to pursue an enforcement action against your client and its principal owners and operators.”	

As evidenced by the fact that All Access Telecom received a Task Force CID two years after its settlement with a State AG and a Task Force warning letter one year after that, providers are not always easily deterred. In this instance, it seems like All Access Telecom may have at least partially sidestepped the requirements of its own settlement. For example, it is possible that All Access Telecom adjusted its position in the flow of call traffic so that its directly upstream customers satisfied the injunctive relief provisions of its settlement, even if bad actors further up the call path⁸⁹ did not.

Avid Telecom Case

Also in 2023, a large coalition of State AGs brought a lawsuit against VoIP provider Avid Telecom. Avid initiated more than 24.5 billion calls in the roughly four-year period between December 31, 2018, and January 31, 2023 – on average, half a billion calls every month. More than 7.5 billion of these calls (30.6%) were to numbers on the National Do Not Call Registry. The State AGs also alleged that Avid not merely transmitted scam robocalls but also:

- Took “express steps to obscure the ownership of at least one of their customers... after the principal owner became the subject of federal and state law enforcement action”;

⁸⁸ These warning letters also reference the Truth in Caller ID Act of 2009, 47 U.S.C. § 227(e), but that is outside the scope of this report, as it pertains more to fraud or deception harms than privacy harms.

⁸⁹ For a more in-depth discussion of least cost routing, read EPIC & NCLC, *Scam Robocalls*, *supra* note 40.

- Provided customers with telephone numbers to “circumvent and undermine consumer, law enforcement, and industry efforts to block and mitigate illegal calls”; and
- Provided leads and expertise that helped their customers run their illegal robocalling and telemarketing schemes more profitably and effectively.⁹⁰

As of December 31, 2024 (the end of the scope of this report period), the lawsuit against Avid Telecom had survived a motion to dismiss and was still in the settlement process, but the company had ceased providing telecommunications services.⁹¹

	Avid Telecom
Industry Tracebacks Received	More than 329
Types of Illegal Calls	Social Security, law enforcement, and other government impersonation, credit card interest rate reduction, Medicare, auto warranty, impersonation of private companies such as Amazon, DirecTV, Experian, and Wells Fargo, and other illegal calls
AGs Involved	48 states (not AK and SD) and DC
Relevant AG Authorities Involved⁹²	TSR, TCPA, SCP, State telemarketing (NV included two such relevant laws, one on solicitations and one on prerecorded messages)

Unwanted Calls Conclusion

Despite multiple generations of annoying disruptions and dangerous scams, a growing structure of robust legislation at the federal and state level, and aggressive enforcement at the state level, unwanted calls and texts persist. We are optimistic that the recent shift in focus from fraudsters to the companies profiting from facilitating the fraud will have a sustained, meaningful impact on a universally loathed, perennial American scourge — especially as scams become further turbocharged by automated methods such as voice cloning. However, the lesson is well taken that even with ample

⁹⁰ Complaint, *State of Arizona v. Michael D. Lansky, L.L.C.*, Case No. 4:23-cv-00233 at ¶¶ 46–46(f) (D. Az. May 23, 2023).

⁹¹ See FCC Form 499 Filer Database, Avid Telecom Detailed Information (Avid Form 499), (Apr. 3, 2023) <https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=828064> (last visited Feb. 26, 2025). As of July 31, 2023, the company is no longer providing telecom services.

⁹² Similar to the warning letters above, this Case also referenced the Truth in Caller ID Act, but that is outside the scope of this report.

statutory authority in place, rigorous and innovative enforcement may be required to effectively combat tech-facilitated privacy harms.

Unwanted Calls Methodology Notes

Pennsylvania's action against Fluent could also have been placed in the Data Privacy Issue Category.⁹³ The actions against Lingo and Life Corp related to the deepfake robocall campaign could have been placed in the Algorithms & Automated Systems Issue Category.⁹⁴ In the Cases Grouped-by-Def./Misconduct dataset, we combined multiples states' individual enforcement actions against MV Realty.⁹⁵ The FTC brought a related action against Fluent,⁹⁶ and sent warning letters to several providers, including All Access Telecom.⁹⁷ The FTC and Social Security Administration provided investigative assistance to State AGs in the Avid case.⁹⁸ The FCC took related actions against Avid, Message/Mahanian (the Wohl/Burkman voter suppression campaigns), One Eye, the Sumco auto warranty campaigns, Rising Eagle, MV Realty, Lingo, iDentidad, RSCOM, ThinQ, and TCA VoIP.⁹⁹ The Connecticut Public Utilities

⁹³ New York also brought an action against Fluent, which we placed in the Data Privacy Issue Category. Although both actions identified both types of misconduct, Pennsylvania's action seemed to place greater emphasis on the resulting unwanted calls, whereas New York's action seemed to place greater emphasis on the lead generation-style practices (which resulted in fake comments filed with the FCC).

⁹⁴ Press Release, *Voter Suppression AI Robocalls Investigation Update* (Feb. 6, 2024), <https://www.doj.nh.gov/news-and-media/voter-suppression-ai-robocall-investigation-update>; Letter to Walter Monk, Founding Owner Life Corp., from Tracy Nayer, Special Deputy Attorney General, North Carolina Dep't of Justice (Feb. 6, 2024), <https://ncdoj.gov/wp-content/uploads/2024/02/State-AG-Task-Force-NOTICE-Letter-to-LIFE-CORP-Feb.-2024-1.pdf>.

⁹⁵ Many more State AGs took enforcement action against MV Realty than we included in this report. That is because many of these enforcement actions alleged unconscionable mortgage practices only and did not include allegations of illegal calls or texts.

⁹⁶ *U.S. v. Fluent, L.L.C.*, FTC File No. 192-3230 (Jul. 18, 2023), <https://www.ftc.gov/legal-library/browse/cases-proceedings/1923230-fluent-llc-us-v>.

⁹⁷ See, e.g., Letter to All Access Telecom, Inc. from Lois C. Greisman, Assoc. Dir. Div. Marketing Practices (Jan. 29, 2020), https://www.ftc.gov/system/files/documents/foia_requests/All%20Access%20Telecom%20Inc%20Warning%20Letter.pdf; FTC Warning Letters sent to VOIP Companies (last visited Oct. 1, 2025), <https://www.ftc.gov/legal-library/browse/frequently-requested-foia-records/voip-companies>.

⁹⁸ Press Release, *Attorney General Mayes Sues Avid Telecom Over Illegal Robocalls* (May 23, 2023), <https://www.azag.gov/press-release/attorney-general-mayes-sues-avid-telecom-over-illegal-robocalls>.

⁹⁹ See footnote 192 in Appendix 4.

Regulatory Authority was involved in the Spark Energy settlement;¹⁰⁰ for the NCWC settlement, the Wisconsin Department of Agriculture, Trade and Consumer Protection referred the matter to the Wisconsin State AG.¹⁰¹

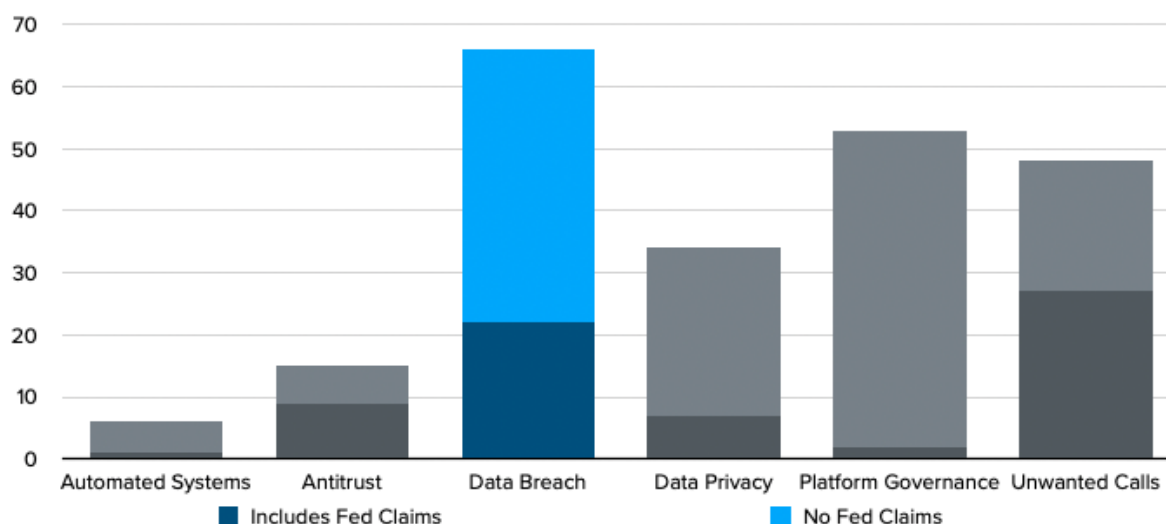
¹⁰⁰ Compl., *State of Connecticut v. Spark Energy, L.L.C.*, Case No. HHD-CV20-6130450-S at 1.1-1.7 (Sup. Ct. Hartford JD Jul. 17, 2020), https://portal.ct.gov/-/media/ag/press_releases/2019/spark.pdf?rev=3168b5b53ea54f11ad8e680a59fa05b0&hash=7703827E362794DF2D5C7CBA8A3BA162.

¹⁰¹ Press Release, Attorney General Kaul, *DATCP Announce Settlement of Enforcement Action Against Extended Vehicle Warranty Telemarketer* (Nov. 22, 2022), https://www.wisdoj.gov/PressReleases/11.22.22_N.C.W.C.pdf.



Data Breach

INDIVIDUAL CASES BY CATEGORY



Overview of Enforcement Actions in Data Breach

State AGs bring Data Breach¹⁰² enforcement actions when consumer data is accessed in contravention of the will, policy, or custodial obligation of the holding company.¹⁰³

Suffering a data breach is potentially ruinous to the impacted consumer; and often thousands, or millions, of consumers are impacted at a time. The focus of consumer

¹⁰² EPIC conceives of a “data breach” more broadly than many State AG enforcement actions. In EPIC’s view, a disclosure that was not authorized by the consumer constitutes a data breach (even if the disclosure was authorized by the company holding that consumer’s data); also, the consumer’s expectation about the company’s safeguards informs the company’s custodial obligations.

¹⁰³ State AGs may allege that a company’s breach notification was untimely. In addition to requiring timely notifications to consumers, state breach notification statutes sometimes require companies to make disclosures to State AGs. These notifications can help to inform a State AG’s awareness of and investigation into data breaches.

harm post-breach is often on the obvious risk of downstream financial harms, such as identity theft, extortion, or the physical safety considerations of having one's home address and other sensitive personal information exposed.¹⁰⁴ However, there are also potential psychological, autonomy, and reputational harms caused by the fact of the breach in and of itself.¹⁰⁵

Where identity theft does occur, the Bureau of Justice Statistics estimates that victims spend a mean time of four hours resolving the issue or a mean of seven hours where an existing account is used to open a fraudulent new account.¹⁰⁶ Recent research from Carnegie Mellon University suggests that people are at risk of psychological impact from fraud regardless of the amount of direct financial loss.¹⁰⁷ As data over the last ten years show, data breaches have increased significantly, per reporting by public, private, and nonprofit sources.¹⁰⁸

¹⁰⁴ Alfred Ng, *Alleged Shooter Found Minnesota Lawmakers' Addresses Online*, Court Docs Say, Politico (Jun. 16, 2025), <https://www.politico.com/news/2025/06/16/alleged-shooter-found-minnesota-lawmakers-addresses-online-court-docs-say-00409260> (citing to data brokers in this instance, but a similar principle applies for data acquired as a result of data breaches).

¹⁰⁵ See, e.g., Danielle Keats Citron & Daniel J. Solove, *Privacy Harms* (February 9, 2021), <https://ssrn.com/abstract=3782222>; Comments of EPIC to the FTC, *Disrupting Data Abuse: Protecting Consumers from Commercial Surveillance in the Online Ecosystem* (Nov. 2022), <https://epic.org/wp-content/uploads/2022/12/EPIC-FTC-commercial-surveillance-ANPRM-comments-Nov2022.pdf>.

¹⁰⁶ Erika Harrell & Alexandra Thompson, *Victims of Identity Theft, 2021* (Oct. 2023), <https://bjs.ojp.gov/document/vit21.pdf>.

¹⁰⁷ See Eman Alashwali, et al., *Detection and Impact of Debit/Credit Card Fraud: Victims' Experiences* (Aug. 15, 2024), <https://arxiv.org/abs/2408.08131>.

¹⁰⁸ In its 2024 report, the Identity Theft Resource Center observed more than 3,000 breaches annually. Identity Theft Resource Ctr., *ITRC 2024 Annual Report* (2024), <https://www.idtheftcenter.org/publication/2024-itrc-annual-report/>. The FBI published its 2024 IC3 report, which observed more than 64,000 complaints regarding breaches of personal data (an increase from the nearly 56,000 complaints in 2023, more than 38,000 in 2019, and 5,145 in the second half of 2014). See, e.g., FBI Internet Crime Complaint Ctr. (IC3), *2024 Internet Crime Report* at 9 (2024), https://www.ic3.gov/AnnualReport/Reports/2024_IC3Report.pdf; FBI IC3, *2023 Internet Crime Report* at 8, 20 (2023), https://www.ic3.gov/Media/PDF/AnnualReport/2023_IC3Report.pdf; FBI IC3, *2014 Internet Crime Report* at 47 (2014), https://www.ic3.gov/AnnualReport/Reports/2014_IC3Report.pdf. Verizon has tracked similar trends. See *2024 DBIR*, Verizon Bus. 5 (2024), <https://www.verizon.com/business/resources/T597/reports/2024-dbir-executive-summary.pdf> (10,626 unique data breaches); *Verizon's 2016 DBIR Finds Cybercriminals Are Exploiting Human Nature*, Verizon News Ctr. (Apr. 29, 2016), <https://www.verizon.com/about/news/verizons-2016-data-breach-investigations-report-finds-cybercriminals-are-exploiting-human> (more than 2,260 breaches);

State AGs have a vital role to play in creating the market incentives that will compel businesses to invest in adequate upstream cybersecurity protections.¹⁰⁹ As renowned security technologist and fellow at Harvard Kennedy School Bruce Schneier noted in the New York Times:

In all of these cases, the victimized organizations could have very likely protected our data better, but the reality is that the market does not reward healthy security. Often customers aren't even able to abandon companies with poor security practices, as many of them build "digital moats" to lock their users in. Customers don't abandon companies with poor security practices. Hits to the stock prices quickly recover. It's a classic market failure of a powerful few taking advantage of the many, and that failure is one that only representation through regulation can fix.¹¹⁰

Fortunately, State AGs were active in responding to data breaches in the 2020–2024 period. The vast majority of state involvement in Data Breach enforcement actions occurred as Multistate actions (91.5%), however some were brought by a lone state (8.5%). Indeed, no other Issue Category featured in this report had more multistate actions that involved larger coalitions of State AGs than Data Breach.¹¹¹

2009 DBIR, Verizon Bus. 2 (2009), <https://www.fbiic.gov/public/2009/april/VBA60069WPDBIR8x1109pdfv1singleR.pdf> (90 confirmed data breaches).

¹⁰⁹ See, e.g., *Breaking the Cycle: Addressing Underlying Causes of Systemic Data Risk*, Remarks from the Chief Technologist Stephanie T. Nguyen As Prepared for Delivery, The Nat'l Sci. Found.'s Secure and Trustworthy Cyberspace Principal Investigators' Meeting (SaTC 2024), Carnegie Mellon Uni. CyLab Security and Privacy Inst., at 4-6 (Sept. 2024), https://www.ftc.gov/system/files/ftc_gov/pdf/satc-stephanie-nguyen-remarks-final.pdf (noting the role of business incentives and the underlying causes of risk in data breaches and other data abuses, and including suggestions such as data minimization).

¹¹⁰ Bruce Schneier, *The Uber Hack Exposes More Than Failed Data Security*, N.Y. Times (Sept. 26, 2022), <https://www.nytimes.com/2022/09/26/opinion/uber-hack-data.html>.

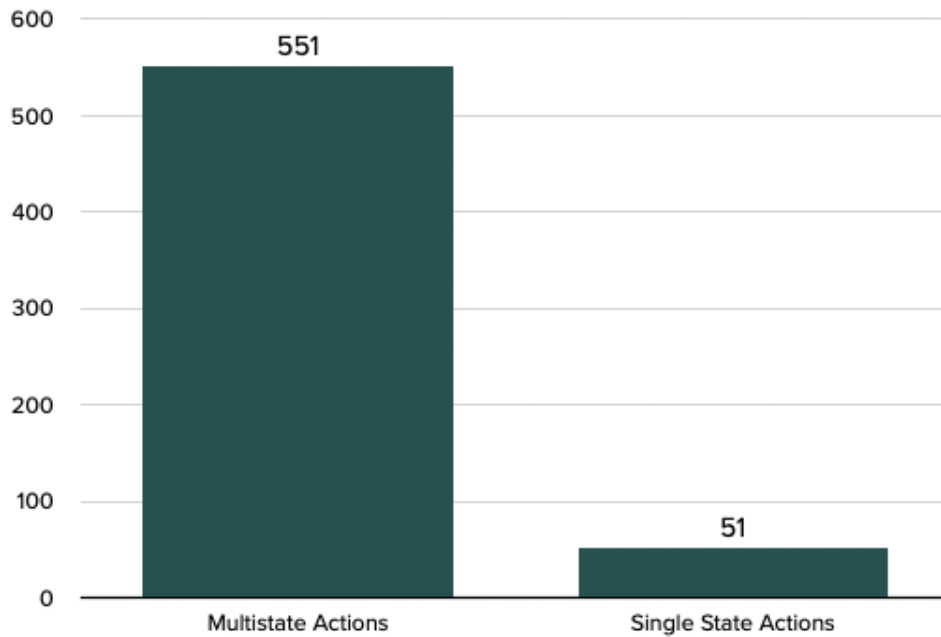
¹¹¹ This means that the percentages in the Total Actions dataset will weigh very heavily towards Multistate, whereas the percentages in the Individual Cases and Grouped-by-Def./Misconduct Cases datasets will not (as it is fewer actions, each of which more states participated in).

Ten Largest Multistate Enforcement Actions on Data Breaches by Number of States Participating

# State AGs	Year	Description	Claims
50	2024	Marriott	State Consumer Protection; State PIP/Breach
50	2023	Blackbaud	HIPAA; State Consumer Protection; State PIP/Breach
47	2020	Home Depot	State Consumer Protection; State PIP/Breach
46	2022	Carnival Cruise	State Consumer Protection; State PIP/Breach
43	2020	Anthem	HIPAA; State Consumer Protection; State PIP/Breach
41	2021	AMCA	State Consumer Protection; State PIP/Breach
40	2022	T-Mobile	State Consumer Protection; State PIP/Breach
40	2022	Experian Info Solutions/T-Mobile	State Consumer Protection; State PIP/Breach
40	2022	Experian Data Corp/Court Ventures	State Consumer Protection; State PIP/Breach
33	2023	Inmediata	HIPAA; State Consumer Protection; State PIP/Breach

Note: Not reflected in the counts for Blackbaud and Anthem are California's respective settlements, reached separately from the Multistate actions.

TOTAL DATA BREACH ACTIONS, BY FED/MULTISTATE STATUS



Unlike in the Unwanted Calls & Texts Issue Category, which featured a very high number of **letters** in its Total Actions dataset due to the Anti-Robocall Task Force, the largest contributor to the high count of enforcement actions in the Total Actions dataset for the Data Breach Issue Category was **Cases**.¹¹² As explained above, this is because State AGs tended to work in large coalitions when resolving Data Breach enforcement actions.

Total Actions	Investigations	Letters	Cases/ Settlements	Grand Total
Data Breach	15	23	564	602

¹¹² Recall we use “Cases” to mean cases or settlements.

Approximately one third of State AG Data Breach enforcement actions included federal claims (e.g. HIPAA), regardless of whether the calculation was based on the Grouped-by-Def./Misconduct Cases dataset (31.7%) or Individual Cases dataset (33%).

All Data Breach enforcement actions (100%) included some form of a State Consumer Protection (SCP) law claim, a fundamental consumer protection authority granted to the State AG. These state consumer protection laws, to varying extents, are similar to the unfair and deceptive acts and practices (UDAP) prohibited in the Federal Trade Commission Act. A deception Data Breach claim

would likely include an allegation of misleading statements about the data protection practices undertaken by the breached company. An unfairness Data Breach claim would likely include an allegation that the company did not take reasonable steps to protect consumers' information to a degree that harmed the consumer and was not reasonably avoidable by the consumer. State data protection and breach notification laws also commonly appeared in State AG enforcement actions related to Data Breach (74% of Individual Data Breach Cases).

INDIVIDUAL DATA BREACH CASES/SETTLEMENTS, BY FED CLAIM STATUS



Data Breach Case Studies

This subsection takes a closer look at several Data Breach enforcement actions during the relevant time period. In all four instances, the company that was the target of enforcement agreed to settlement terms. The terms included both a financial component and injunctive relief which required the company to implement better cybersecurity practices to prevent a similar breach in the future. The T-Mobile/Experian and Marriott/Starwood settlements are featured because one of the defendant companies involved acquired another organization that had deficient cybersecurity practices. The Blackbaud settlement is featured because of its cascading consequences. We included

the settlement with Avalon Healthcare Management as an example of a Multistate Data Breach case that did not involve a large number of State AGs.

T-Mobile/Experian Settlements

In 2015, millions of T-Mobile consumers who applied for postpaid plans and device financing through Experian had their data exposed,¹¹³ including: Social Security Numbers (SSNs); driver's license numbers (DLNs) or passport information; as well as name, address, and other information used for credit assessments. Additionally, in 2012, Experian experienced a breach in the systems of an acquisition called Court Ventures. Approximately forty state AGs jointly brought these related enforcement actions against T-Mobile and Experian.

	T-Mobile
Company Size	One of the top three largest phone companies in the U.S.
Breach Size	15 million consumer records
How Breach Occurred	Experian server hosting personal data for T-Mobile's credit application process compromised
Data Breached	SSN, DOB, DLN or Passport info, name, address, info used for credit assessments
AGs Involved	39 states (not AL, AK, CA, CO, NC, NM, SC, SD, UT, WV, WY) and DC
AG Authorities Involved	SCP, State Personal Info Protection, State Breach Notification
Settlement Terms/Relief	\$2.4 million; must impose contractual data security requirements on vendors and subvendors; segmentation of systems; encryption; secure password; patching; vendor assessment and monitoring

	Experian/T-Mobile	Experian/Court Ventures
Company Size	One of three nationwide credit bureaus	
How Breach Occurred	Server compromised	Thief posed as private investigator

¹¹³ Postpaid plans are phone plans in which the consumer receives a bill at the end of the month rather than paying in advance. Device financing allows a consumer to pay for their phone in monthly installments. Either program typically require a credit check. As one of the three major consumer credit reporting companies, Experian was entrusted with this information about T-Mobile's customers and prospective customers.

Data Breached	See T-Mobile above	Court Ventures data, containing SSN, DOB, and more
AGs Involved	39 states and DC (see above)	48 states (not AL, WY) and DC
AG Authorities Involved	SCP, State Personal Info Protection, State Breach Notification	
Settlement Terms/Relief	\$12.7 million, due diligence in vetting acquisitions and integrations, data minimization, encryption, intrusion detection, firewalls, access controls, logging and monitoring, penetration testing, risk assessments	\$1 million, strengthen oversight over third parties, maintain “Red Flags” program to detect and respond to identity theft

Marriott Settlement

Hospitality chain Starwood experienced a breach from 2014 to 2018 in which its web server was compromised, malware was installed, and infiltration deeper into the company’s networks went undetected – exposing hundreds of millions of records. Starwood was acquired by Marriott in 2016. Marriott itself separately experienced a breach of its own systems in 2018 and in 2020 due to compromised employee credentials.

	Marriott	Starwood
Company Size	Largest hotel chain in the world (19.6% market share among competitors)	Acquired by Marriott
Breach Size	1.8 million Americans (5.2 million customers globally)	131.5 million Americans (339 million globally)
How Breach Occurred	Server compromised	Employee credentials compromised
Data Breached	Name, address, email, phone, affiliated companies, gender, month and day of birth, loyalty info, hotel stay and room preferences	Contact information, gender, DOB, passport info, payment cards, reservation info, preferred guest info and hotel stay preferences
AGs Involved	49 states (not CA) and DC; the FTC brought a related action	
AG Authorities Involved	SCP, State Personal Info Protection, State Breach Notification	

Settlement Terms/Relief	\$52 million, info security program, data minimization, due diligence for acquisitions, vendor and franchisee oversight with emphasis on risk assessments for “Critical IT vendors” and cloud providers, asset inventory, encryption, segmentation of systems, patch management, intrusion detection, access controls, logging and monitoring, biennial third party assessment for twenty years, quarterly reporting to State AGs on progress in implementing settlement provisions, consumer controls (including data deletion, multi-factor authentication, and account monitoring)
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Blackbaud Settlements

In 2020, Blackbaud experienced a breach in its software, which is used by educational institutions, religious organizations, healthcare entities, and other nonprofits to manage donor relations. This breach is worth highlighting because it caused cascading effects, wherein one software company’s breach resulted in breaches at more than ten thousand other organizations.

	Blackbaud	
Company Size	\$1.2 billion revenue	
Breach Size	Millions of files belonging to 13,000 customer orgs using Blackbaud software	
How Breach Occurred	Customer login compromised	
Data Breached	SSN, DLN, Passport, DOB, health data, financial data, student ID, donor info, address, phone, email	
AGs Involved	All States and DC (but CA brought suit individually)	California
	The FTC brought a related action	
AG Authorities Involved	Multistate: HIPAA, SCP, State Personal Info Protection, State Breach Notification	CA: SCP (unfair competition law; false advertising law)
Settlement Terms/Relief	\$49.5 million; info security plan; employ Chief Privacy Officer, Chief Information Security Officer, and Chief Technology Officer functions; incident response and breach response plans tested twice per year; oversight of third-party vendors (including data storage and cloud providers); searching, monitoring and	\$6.75 million, only 60 days to implement changes (terms comparable to Multistate)

	tracking Blackbaud customer data on the dark web; third party assessments; segmentation of systems; penetration testing; access controls; file integrity monitoring; handling of unauthorized/malicious apps; logging and monitoring; change control; asset inventory; digital certificates; endpoint detection and response; intrusion detection and prevention; threat mgmt.; updates/patch mgmt.; 180 days to implement changes	
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Avalon Healthcare Management Settlement

Not every Multistate data breach enforcement action involves dozens of State AGs. In 2019, Avalon Healthcare Management experienced a breach when an employee account was compromised due to a successful phishing email scam; the hacker obtained the personal and health information of more than 14,500 patients. Two states brought a Multistate action against the healthcare company.

	Avalon Healthcare Management
Company Size	More than a dozen facilities across six states
Breach Size	More than 14,500 patients
How Breach Occurred	Employee credentials compromised
Data Breached	SSN, DOB, DLN, health data, financial data, name, address
AGs Involved	Utah and Oregon
AG Authorities Involved	HIPAA, SCP, State Personal Info Protection
Settlement Terms/Relief	\$200k, info security program, HIPAA-specific info security program, incident response plan, record-keeping for incidents that don't trigger reporting, biannual internal risk assessments and penetration testing, annual third-party security risk assessment for seven years, delete emails containing personal information after the legal/business purpose for retention ceases

Some states, like New York, regularly bring data breach actions individually rather than through a jointly captioned Multistate action. California, Colorado, Kansas, Massachusetts, New Jersey, and Pennsylvania also brought three or more individual data breach enforcement actions in the 2020–2024 period.

Data Breach Conclusion

Data breaches, unfortunately, have become a familiar source of privacy harms that State AGs must respond to. As such, AGs have developed tools and processes to efficiently address these consumer harms. Sector-specific federal laws like HIPAA can empower State AGs to bring enforcement actions where the data at issue (e.g., health data in the case of HIPAA) has been exposed. Additionally, all 50 states, DC, Guam, Puerto Rico, and the Virgin Islands have implemented some form of a data breach notification law.¹¹⁴ As with the FTC, states also have invoked their UDAP authorities under their respective State Consumer Protection laws to compel companies to be better custodians of the consumer data with which they are entrusted in order to conduct their business and provide value to the market.

Data Breach Methodology Notes

Some of the medical waste Cases (e.g. Enzo, Quest, Kaiser, Walmart, etc.) also implicate Data Privacy issues. In the Cases Grouped-by-Def./Misconduct dataset, we aggregated a California action brought against the same defendant as a multistate coalition in several matters (e.g. Anthem, Blackbaud, Home Depot). We also combined New York's case against EyeMed with the corresponding Multistate action.¹¹⁵ The FTC brought related actions against Marriott (State AGs additionally noted that they worked in "close coordination" with the agency),¹¹⁶ Blackbaud,¹¹⁷ and CafePress.¹¹⁸ Following the company's 2017 data breach, the FTC and CFPB

¹¹⁴ See, e.g., Nat'l Conf. of St. Legislatures, *Security Breach Notification Laws* (updated Jan. 17, 2022), <https://www.ncsl.org/technology-and-communication/security-breach-notification-laws>.

¹¹⁵ Brought by Florida, New Jersey, Oregon, and Pennsylvania.

¹¹⁶ *In re: Marriott Int'l, Inc. and Starwood Hotels & Resorts Worldwide*, FTC File No. 192-3022 (Oct. 9, 2024), <https://www.ftc.gov/legal-library/browse/cases-proceedings/192-3022-marriott-international-inc-starwood-hotels-resorts-worldwide-llc-matter>; see, e.g., Press Release, AG Campbell Announces \$52 Million Settlement With Marriott For Breach Of Guest Reservation Database (Oct. 9, 2024), <https://www.mass.gov/news/ag-campbell-announces-52-million-settlement-with-marriott-for-breach-of-guest-reservation-database> (noting close coordination).

¹¹⁷ *In re: Blackbaud, Inc.*, FTC File No. 202-3181 (Feb. 1, 2024), <https://www.ftc.gov/legal-library/browse/cases-proceedings/2023181-blackbaud-inc>.

¹¹⁸ *In re: CafePress*, FTC File No. 192-3209 (Mar. 15, 2022), <https://www.ftc.gov/legal-library/browse/cases-proceedings/1923209-cafepress-matter>.

and several State AGs brought enforcement actions against Equifax.¹¹⁹ We note here that only the Massachusetts settlement with Equifax was within the five year time frame of the report scope. The State AGs that reached settlements in 2019 are not included in the report as they were reached prior to 2020. The U.S. Department of Health and Human Services, Office of Civil Rights, issued a Dear Colleague letter about Change Healthcare.¹²⁰ The New York State Department of Labor assisted with the Geico and Travelers settlements.¹²¹ The Vermont Department of Financial Regulation assisted with the investigation in the Morgan Stanley settlement.¹²² The Secretaries of State of Colorado, Georgia, Maryland, North Carolina, and Tennessee, as well as the Florida Department of Agriculture and Consumer Services and the Utah Division of Consumer Protection joined in the ACS settlement.¹²³

¹¹⁹ Press Release, CFPB, FTC and States Announce Settlement with Equifax Over 2017 Data Breach (Jul. 22, 2019), <https://www.consumerfinance.gov/about-us/newsroom/cfpb-ftc-states-announce-settlement-with-equifax-over-2017-data-breach/>; Press Release, 50 Attorneys General Secure \$600 Million from Equifax in Largest Data Breach Settlement in History (July 22, 2019), oag.dc.gov/release/50-attorneys-general-secure-600-million-equifax (providing list of State AGs).

¹²⁰ U.S. Dep't of Health and Human Services, *Change Healthcare Cybersecurity Incident Frequently Asked Questions* (updated Mar. 14, 2025), <https://www.hhs.gov/hipaa/for-professionals/special-topics/change-healthcare-cybersecurity-incident-frequently-asked-questions/index.html>.

¹²¹ Press Release, Attorney General James and DFS Superintendent Harris Secure \$11.3 Million from Auto Insurance Companies over Data Breaches (Nov. 25, 2024), <https://ag.ny.gov/press-release/2024/attorney-general-james-and-dfs-superintendent-harris-secure-113-million-auto>.

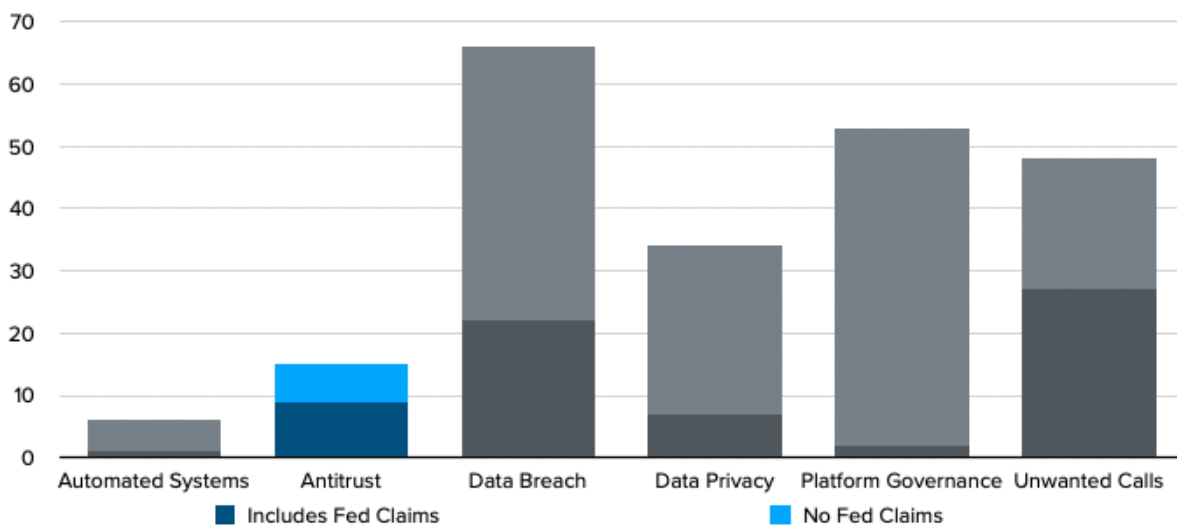
¹²² Press Release, Attorney General Clark and Commissioner Gaffney Announce \$595,000 Settlement with Morgan Stanley for Data Security Incidents (Nov. 16, 2023), <https://ago.vermont.gov/blog/2023/11/16/attorney-general-clark-and-commissioner-gaffney-announce-595000-settlement-morgan-stanley-data>.

¹²³ Press Release, Attorney General Josh Stein Shuts Down Massive Charity Fraud Robocall Operation (Mar. 4, 2021), <https://ncdoj.gov/attorney-general-josh-stein-shuts-down-massive-charity-fraud-robocall-operation/>. The Utah State AG often notes the involvement of, and the State AG's legal representation of, the Utah Division of Consumer Protection which is located within the state's Department of Commerce.



Antitrust

INDIVIDUAL CASES BY CATEGORY



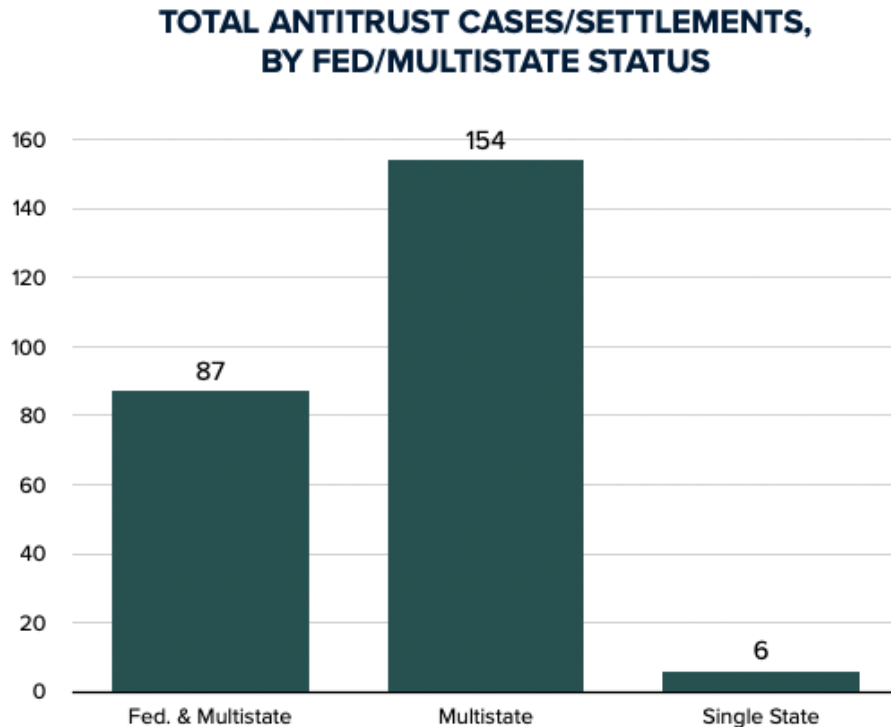
Overview of Enforcement Actions in Antitrust

Antitrust law increasingly involves consumer data issues. Companies can amass personal data for anticompetitive means. Data can be a valuable resource to concentrate market power or create monopolies that impede newer entrants to a market. Other anticompetitive practices involving personal data include price discrimination. Companies can also aggregate and use consumer data as part of a strategy to tie or bundle products together, further stunting consumer choice.

The dominance of big tech companies in the marketplace is relatively clear. From 2020 to 2024, State AGs brought antitrust lawsuits against companies like Google, Apple, Amazon and Facebook. State AGs also zeroed in on less obvious targets, like property management software company RealPage and the Kroger and Albertsons

grocery store companies. While not as conspicuous as the big tech companies, these companies' allegedly anticompetitive behaviors impacted consumers in material ways. For example, RealPage's use of sensitive personal data and pricing algorithms distorted competition to raise rental prices around the country, and the proposed Kroger-Albertsons merger threatened to raise food prices based, in part, on consolidating consumer data from the two large grocery store chains.

From 2020 to 2024, State AGs tended to work together on antitrust enforcement, filing jointly as coalitions in over 62% of total antitrust enforcement actions. The U.S. Department of Justice and/or the Federal Trade Commission also filed jointly with State AGs in 35% of antitrust Cases. State AGs filed claims as a single state, without other State AGs or federal partners, in only 2% of antitrust enforcement actions.

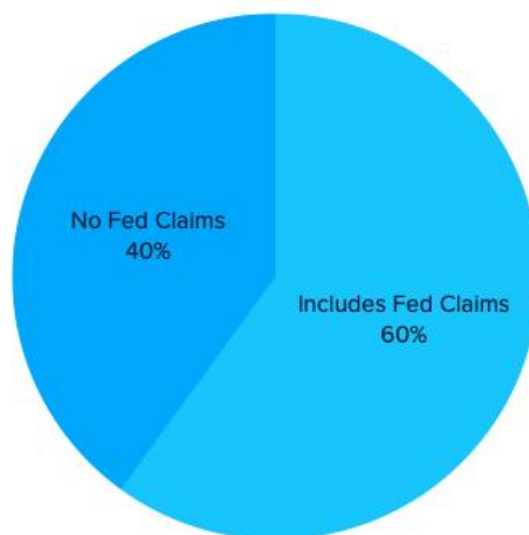


We did not observe any investigations announced or letters sent related to the Antitrust Issue Category that were not followed up by a subsequent, relevant Case.

Total Actions	Investigations	Letters	Cases/ Settlements	Grand Total
Antitrust	0	0	247	247

State AGs consistently included Sherman Act and Clayton Act claims in 60% of antitrust enforcement actions. In addition to claims based on federal statutes, State AGs also included state antitrust claims in a third of the enforcement actions. Overall, antitrust comprised only 11% of total nationwide enforcement actions.

**INDIVIDUAL ANTITRUST CASES/
SETTLEMENTS, BY FED CLAIM STATUS**



Antitrust Case Studies

While many of the State AGs' Cases were against Big Tech, this section will focus on two case studies addressing actors using private data in allegedly anticompetitive ways to harm consumers. These enforcement efforts address anticompetitive business practices that affect rising housing and food prices. The Cases against property management software company RealPage and grocery store chains Kroger and Albertsons illustrate how State AGs pursued antitrust enforcement related to consumer data outside of big tech.

Kroger-Albertsons Merger

In February 2024, nine State AGs and the Federal Trade Commission (FTC) filed a complaint in federal court in Oregon to block a proposed merger of grocery store chains Kroger and Albertsons. Kroger and Albertsons are supermarket giants, each operating thousands of grocery stores across the country. Kroger's proposed acquisition of Albertsons for \$26.4 billion represented the largest proposed supermarket merger in U.S. history.¹²⁴ State AGs and the FTC alleged that the merger would violate the Clayton Act by substantially lessening competition or creating a monopoly. In addition to the Multistate and FTC lawsuit, Washington and Colorado filed lawsuits to prevent the merger in their respective state courts. While the Colorado AG alleged the merger

¹²⁴ Press Release, FTC, *FTC Challenges Kroger's Acquisition of Albertsons* (Feb. 26, 2024), <https://www.ftc.gov/news-events/news/press-releases/2024/02/ftc-challenges-krogers-acquisition-albertsons>.

would violate state antitrust law, the Washington AG focused instead on State Consumer Protection law.

All three complaints highlighted supermarket analytics and consumer data science capabilities that were central to both Kroger and Albertsons' business operations.¹²⁵ Loyalty programs and tracking consumer data provide valuable insights into consumer behavior. The supermarket chains use third party and internal data analytics to set pricing, customize shopping experiences, and target advertising to consumers. Customer data also provides an alternative revenue stream, as the grocery store chains openly sell consumer data and insights to third parties or back to its suppliers for targeted advertising purposes. As Colorado noted, "Kroger claims that its loyalty program is at the core of its business."¹²⁶ The FTC and Multistate complaint explained:

Defendants' strategies include building a profitable 'flywheel' (assets that work together to enable continuous growth) of data science capabilities, including loyalty program data that provide insights into consumer behavior [...] These corporate capabilities are integral to the success of Defendants' individual stores.¹²⁷

State AGs in federal and state courts, under both state consumer protection and antitrust law, asked the Courts to consider the value of consumer data and related analytics in determining whether the Kroger-Albertsons Merger was unlawful and would harm consumers.

In December 2024, a federal judge halted the merger while it underwent administrative review at the FTC, and a Washington state court judge held that the

¹²⁵ Complaint at 60-62, *Washington v. Kroger Co. & Albertsons Co.'s, Inc.*, No. 24-2-00977-9, (Wash. King Cnty. Super. Ct., Jan. 16, 2024), https://agportal-s3bucket.s3.us-west-2.amazonaws.com/uploadedfiles/Another/News/Press_Releases/KrogerAlb_Complaint_Stamped.pdf?VersionId=nuhU2mH8eEcmRly0.QAx1AxnH0RMFgAY; Complaint at 18-19, 30-39, *Colorado v. Kroger Co. and Albertsons Companies, Inc.*, No. 2024CV30459, (Colo. Denver Dist. Ct., Feb. 14, 2024), <https://coag.gov/app/uploads/2024/02/2024-02-14-Complaint-Public.pdf> [hereinafter *Colorado K-A Complaint*]; Complaint at 40, *FTC v. Kroger Co. & Albertsons Co.'s, Inc.*, No. 3:24-cv-00347, https://illinoisattorneygeneral.gov/News-Room/Current-News/001%202024.02.26%20Public%20Redacted%20Complaint.pdf?language_id=1 [hereinafter *FTC K-A Complaint*].

¹²⁶ *Colorado K-A Complaint*, *supra* note 125 at 18.

¹²⁷ *FTC K-A Complaint*, *supra* note 125 at 40.

merger would violate Washington state consumer protection law. Shortly after, the supermarket chains abandoned the merger deal.

RealPage

State AG enforcement against property management software company RealPage alleged collusion by algorithm, where the company allegedly facilitated landlord coordination for setting rental prices. According to complaints, landlords agreed to share nonpublic, competitively sensitive data with RealPage and, through RealPage, with each other, fueling pricing algorithms that aligned pricing among competing landlords. In February 2024, Arizona filed a suit in state court against RealPage alleging violations of state antitrust and consumer protection law. Later that year, eight State AGs filed a complaint in federal court jointly with the U.S. Department of Justice against RealPage for multiple violations of the Sherman Act. According to the complaints, RealPage’s landlord customers used its anticompetitive pricing software to significantly raise rents across the country. Landlords raked in profits and worsened an existing crisis in affordable housing. In these Cases, State AGs enforced traditional antitrust and consumer protection authority to address anticompetitive practices in the realm of emerging technology.

Antitrust Conclusion

State AGs relied on existing antitrust law, both on the federal and state level, to challenge data-fueled anticompetitive conduct in the tech industry. In the face of lengthy litigation and moneyed defendants, State AGs pooled resources and worked together. Often filing in broad multistate, bipartisan coalitions, and sometimes with the federal government, State AGs took action to protect consumer privacy and choice, and to achieve a healthy marketplace for competition in our data-driven world.

Antitrust Methodology Notes

The three actions against RealPage could also have been placed in the Algorithms & Automated Systems Issue Category, as they pertain to price-fixing algorithms. The lawsuit against Google for its Search monopoly also could be placed there; the court’s opinion discusses generative AI

and large language models (LLMs).¹²⁸ In the Cases Grouped-by-Def./Misconduct dataset, we combined the three RealPage Cases, the three Amazon Cases, the three Kroger Cases, and the two Google Ad Tech Cases. The FTC brought a related action against Meta/Facebook.¹²⁹

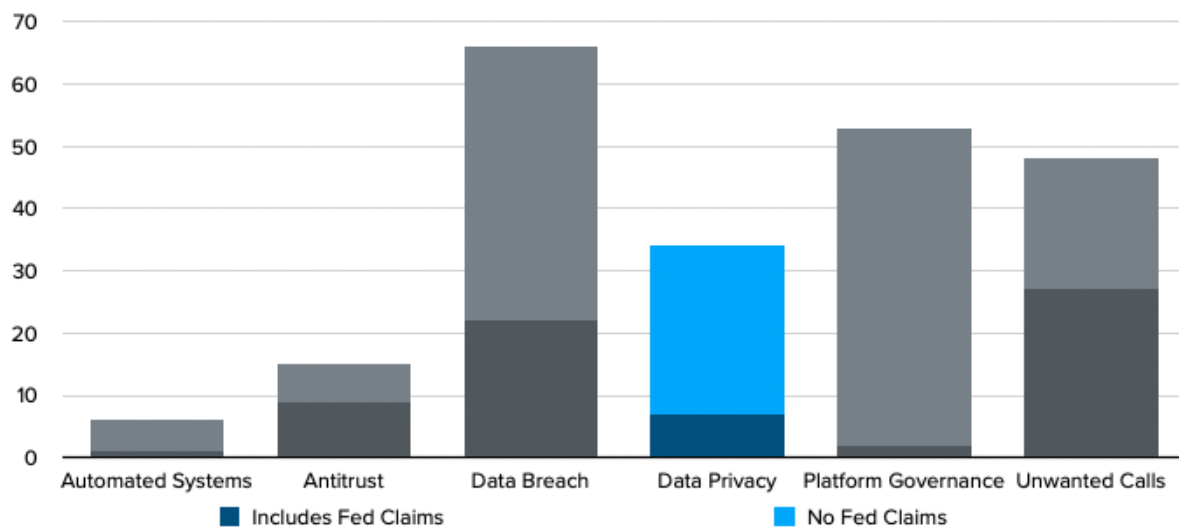
¹²⁸ See, e.g., Mem. Op., *United States, et al., v. Google*, Case No. 1:20-cv-3010-APM at ¶¶ 99-101 (D.D.C. Aug. 5, 2024), <https://www.doj.nh.gov/sites/g/files/ehbemt721/files/inline-documents/sonh/8-5-24-google-antitrust-decision.pdf>.

¹²⁹ FTC Case page, *FTC. v. Meta*, <https://www.ftc.gov/legal-library/browse/cases-proceedings/191-0134-facebook-inc-ftc-v-ftc-v-meta-platforms-inc> (last visited Oct. 6, 2025).



Data Privacy

INDIVIDUAL CASES BY CATEGORY

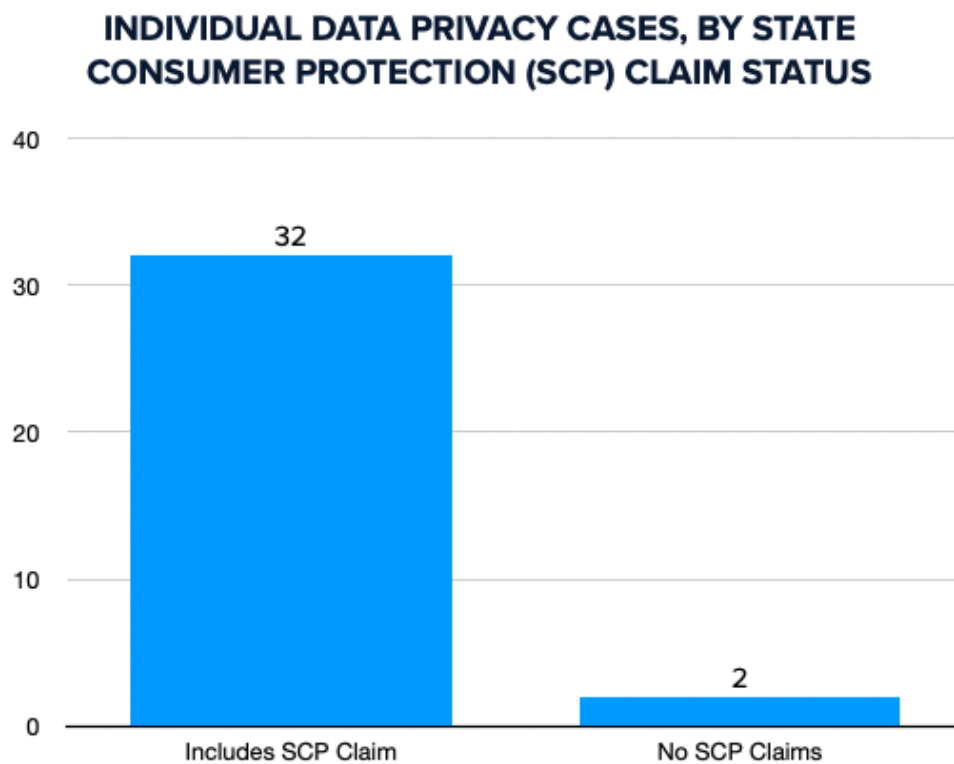


Overview of Enforcement Actions in Data Privacy

Surreptitious or non-transparent data collection feels like spying; using data about us in ways that we did not authorize, such as selling our data to third parties, feels like a form of treachery. As consumers, we expect a business to do what it led us to believe it would do—that's how transactions are supposed to work. The Data Privacy Issue Category includes State AG actions brought against companies collecting or using personal data in ways consumers did not expect, as well as lead generator or data broker companies that disguised their intended uses when collecting contact information—to sell, resell, and repurpose it. This could include failing to minimize data collection, lack of transparency about data practices, exceeding purpose

specifications, using an inadequate consent mechanism to justify processing sensitive data, and failing to conduct data protection assessments or privacy impact assessments.

The vast majority of Data Privacy Cases from 2020–2024 were brought on State Consumer Protection (SCP) law grounds.¹³⁰ Even where state or federal privacy laws applied, they were rarely leveraged without SCP law claims as well. With only two exceptions (one action brought by California using only state comprehensive privacy and state online privacy claims, and one action by Texas using only a state biometric privacy claim), every action in this Issue Category included alleged violations of an SCP law (92%+).¹³¹



Some Cases also alleged violations of, or directed compliance with, COPPA, HIPAA, TSR, state telemarketing law, state education privacy law, state health privacy law, state biometric privacy law, state online privacy law, State PIP/Breach law, and the

¹³⁰ They may have included other claims as well, *see* Appendix 1.

¹³¹ *See* Appendix 1. Recall Individual Cases counts unique cases and settlements, whereas Grouped-by-Def./Misconduct Cases aggregates related cases/settlements and counts them as a single enforcement action (e.g. Google Location was 8 Individual Cases but 1 Grouped-by-Def./Misconduct Case, *see* below). 94% of Individual Cases in the Data Privacy Issue Category include a SCP claim; 92% of Grouped-by-Def./Misconduct Cases included a SCP claim.

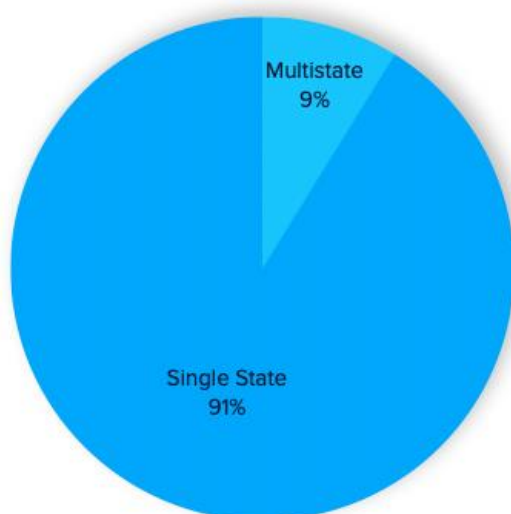
state Constitution. In each of New Mexico’s three Data Privacy Cases, the State AG included allegations of the privacy tort intrusion upon seclusion.

Interestingly, we did not see any publicly announced investigations of Data Privacy matters that was not followed up by a subsequent, relevant Case.¹³²

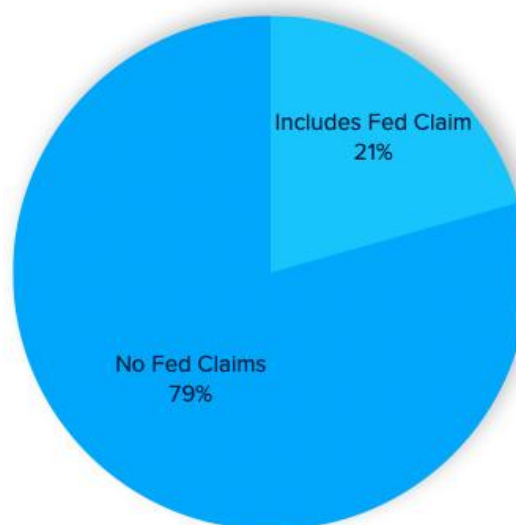
Total Actions	Investigations	Letters	Cases/ Settlements	Grand Total
Data Privacy	0	93	78	171

Data Privacy comprised 16% of Cases and settlements.¹³³ The majority of Data Privacy enforcement actions were brought by a Single State (90%+), as opposed to a Multistate coalition or in partnership with a federal agency.¹³⁴ 21% of Individual Data Privacy Cases included a federal claim.¹³⁵

**INDIVIDUAL DATA PRIVACY CASES,
BY FED/MULTISTATE STATUS**



**INDIVIDUAL DATA PRIVACY CASES,
BY FED CLAIM STATUS**



¹³² Recall “Case” means case or settlement.

¹³³ Note that this only measures the number of actions; it does not reflect the size or complexity of the actions.

¹³⁴ DC, Connecticut, and Oregon reached a settlement with Premom/Easy Healthcare that was negotiated and finalized in coordination with the FTC, but we found no public legal document listing the FTC and the State AGs together. Therefore, we counted this action as “Multistate” not as “Fed. & Multistate.”

¹³⁵ This percentage increases to 28% when looking at what percentage of Data Privacy Cases included federal claims in the Cases Grouped-by-Def./Misconduct dataset.

Data Privacy Case Studies

We will take a closer look at two Data Privacy actions: the first action, against Rovio, was brought by a single state, and the other action, against Google, involves nearly all states and DC across eight individual Cases. The Rovio case is interesting because it includes federal claims, state claims, and common law claims. The case involves children’s data in a way that foreshadows similar State AG-targeted misconduct in the Platform Governance category; and because it seemed to resolve without a public settlement. The Google case is interesting because, although the State AGs largely sought and obtained similar relief and each brought solely State Consumer Protection law claims, there were subtle differences in the alleged violations. The Google case also implicates manipulative design practices (sometimes called “dark patterns”) that take on a greater focus in future Platform Governance-related State AG enforcement efforts.

Rovio (Angry Birds) Complaint

In this first case, the New Mexico State AG filed a complaint against Rovio, the parent company of the once-popular Angry Birds game, in August 2021. The complaint alleged that Rovio aggressively marketed the app to young children for financial gain by selling paid apps, virtual goods that enhance play, and physical goods that serve as conduits to download the game. It noted that by 2013 researchers had identified Angry Birds as the most addictive game for kids and that Rovio “monetizes children by surreptitiously exfiltrating their personal information while they play [Angry Birds] and then using that personal information for commercial exploitation.” Rovio tracked individuals across apps and devices with Software Development Kits (SDKs) designed and implemented by digital advertising companies.

The complaint noted that children are often unable to distinguish between advertising and non-advertising content, which was part of the motivation for Congress enacting the Children’s Online Privacy Protection Act (COPPA). COPPA requires that, for content directed towards children, companies must obtain direct and verified parental notification and consent prior to collecting their child’s personal information. Rather than complying with these COPPA provisions, the State AG alleged that Rovio instead:

[E]lected to go the opposite route: declaring – without any reasonable basis and contrary to all public-facing representations and evidence – that anyone who plays the Angry Birds Gaming Apps is an adult, unless the child user – unprompted but for a single paragraph buried deep within a privacy policy – somehow provides unsolicited information to the contrary.¹³⁶

According to the complaint, a key feature the SDKs promoted to Rovio was the ability to get users to keep playing their games using demographic and behavioral analysis. This included leveraging user personal information to “trigger events – both within the app and across the Internet – that will encourage them [children] to play any app more often and for longer periods.”¹³⁷ The complaint also cited to the Supreme Court’s decision in *Carpenter v. the United States*, which emphasized that an individual’s cell phone location data can help to achieve near perfect surveillance of that individual.

The New Mexico State AG alleged that Rovio violated COPPA, violated New Mexico’s SCP by willfully and surreptitiously harvesting kids’ data for psychological and commercial exploitation, and committed the common-law tort of intrusion upon seclusion by surreptitiously and intentionally tracking and profiling children in egregious violation of social norms.

	Rovio (Angry Birds)
Company Size	More than \$300 Million
AGs Involved	New Mexico
AG Authorities Involved	COPPA, State Consumer Protection law, Intrusion upon seclusion
Data at Issue	Persistent identifiers used to track user activity across apps and devices
Settlement Terms/Relief	The complaint sought injunctive relief to prevent future violations of COPPA, the FTC Act, State Consumer Protection law, and the common law tort of intrusion upon seclusion, as well as restitution, disgorgement, civil penalties, and punitive damages. We found no press release about a settlement.

¹³⁶ Complaint, *State of New Mexico v. Rovio Entertainment Corp.*, Case No. 1:21-cv-00824 at ¶ 61 (D. N.M. Aug. 25, 2021).

¹³⁷ *Id.* at ¶ 130.

We were not able to find a settlement for this case; the case docket indicated that a joint stipulation of dismissal was filed in December 2022.

Google Location Settlements

The next case study pertains to location data specifically. This includes data from which location can be inferred. In 2018, an Associated Press investigation revealed that Google continued to track users' movements even after they had turned off "Location History."¹³⁸ State AGs revealed just how complex the maze of Google's settings was, misleading consumers into thinking that their user settings could control Google's location data collection practices. Between Google's express misrepresentations, material omissions, and misleading user interfaces, Google tricked consumers into believing they could control how Google collected and used location data – when in reality Google always had a method for obtaining it.

	Google
Company Size	More than \$280 billion at the time, more than \$220 billion of which was attributable to advertising
AGs Involved	51, across eight individual Cases
AG Authorities Involved	State Consumer Protection law
Data at Issue	Location data and data from which location could be inferred (e.g. IP address, WiFi or Bluetooth signal, etc.)
Settlement Terms/Relief	Across all public settlements containing injunctive relief: ¹³⁹ providing clear and conspicuous information to consumers about location tracking practices; providing consumers with greater control over how Google collects and uses their location data by making it easier to disable collection and delete stored data; establishing policies that limit how long Google can store and use location data, including documented privacy impact assessments prior to changing how Google uses or shares users' precise location information; and requiring compliance reporting.

¹³⁸ Ryan Nakashima, *AP Exclusive: Google Tracks Your Movements, Like it or Not*, Assoc. Press (Aug. 13, 2018), <https://apnews.com/article/828aefab64d4411bac257a07c1af0ecb>.

¹³⁹ Arizona's settlement did not contain injunctive relief. We were unable to obtain a public copy of Texas' settlement, but it likely occurred outside the temporal scope of this report.

As to the timing of these various public State AG enforcement actions:¹⁴⁰

- May 2020 – Arizona filed its complaint¹⁴¹
- January 2022 – the District of Columbia, Indiana, Texas,¹⁴² and Washington filed their respective complaints on the same day
- October 2022 – Arizona filed its settlement agreement¹⁴³
- November 2022 – a forty-state coalition led by Oregon and Nebraska filed a settlement¹⁴⁴
- December 2022 – Indiana and DC filed their settlement agreements on the same day
- March 2023 – a five-state coalition led by New Hampshire filed a settlement¹⁴⁵
- May 2023 – Washington announced its settlement¹⁴⁶
- September 2023 – California filed its complaint and announced its settlement¹⁴⁷

The underlying factual allegations were mostly similar across all eight actions;¹⁴⁸ however, perhaps due to different state legal authorities, the complaints framed the

¹⁴⁰ Each of these unique actions are listed in their own row in Appendix 1. For those readers interested in Methodology, this case was counted as 51 Total actions, 8 Individual Cases, and 1 Grouped-by-Def./Misconduct Case.

¹⁴¹ For those readers interested in the settings that governed user location data, Arizona's complaint features a helpful chart of twelve different settings, which Indiana included in its complaint as well.

¹⁴² As of December 31, 2024, Texas had not yet publicly announced a settlement. Texas published a press release announcing a settlement in principle in May 2025. This settlement also included resolution of allegations about Incognito searches and biometric data.

¹⁴³ This settlement agreement seemed to contain an \$85 million payment but no injunctive relief provisions. The lack of injunctive relief may have been due to four other State AGs having active complaints, with a forty-state coalition action imminent in the following month.

¹⁴⁴ This Assurance of Voluntary Compliance included the following forty states: Alabama, Alaska, Arkansas, Colorado, Connecticut, Delaware, Florida, Georgia, Hawai'i, Idaho, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Utah, Vermont, Virginia, and Wisconsin.

¹⁴⁵ This Assurance of Discontinuance included the following five states: New Hampshire, Montana, Rhode Island, West Virginia, and Wyoming.

¹⁴⁶ A Consent Decree.

¹⁴⁷ A Proposed Final Judgement and Permanent Injunction.

¹⁴⁸ One possible exception appears in a heavily redacted section of Arizona's complaint, which references Google pushing a variety of updates that automatically change user settings and defaults,

privacy harms and relief sought in slightly different ways. For example, while many states included factual allegations that Google deceptively told users it “needed” location information to provide its services, only Indiana and DC explicitly included in their legal claims that Google appeared to condition use of its services on consumer consent to be tracked.

Some states raised more than deception-based allegations. Arizona, for example, alleged that Google “knowingly maintain[s] a misleading and diverse array of settings related to location tracking that makes it difficult if not impossible to understand the conditions in which Google will collect location data,” which the Arizona AG framed broadly as deceptive and unfair.¹⁴⁹ Indiana brought legal allegations related to unfair, abusive, or deceptive *acts or practices*, not merely misrepresentations or omissions. Washington similarly alleged unfair and deceptive practices “by collecting, storing, and using consumers’ location data without their knowledge or consent, or in contravention of users’ intent,” explicitly referencing Google’s use of dark patterns as one example.¹⁵⁰ While Texas expressly mentioned dark patterns in its factual allegations, its legal allegations only included misrepresentations and omissions. DC and California alleged one count regarding misrepresentations and omissions and a second count regarding unfair practices.

As far as relief, DC and Washington explicitly stated in their complaints that Google’s disgorgement should include deletion of data and algorithms developed using such data.

separately from discussion of the on-by-default issue. While every other complaint referenced the on-by-default and nudging to re-enable when disabled issues, we did not see allegations of software updates overriding a user’s preferences in any other complaint. It is possible these redacted allegations are a restatement of the on-by-default issue.

¹⁴⁹ Complaint, *State of Arizona v. Google LLC*, Case No. 2020-cv-6219 at ¶ 161(h) (D. Az. May 27, 2020).

¹⁵⁰ Complaint, *State of Washington v. Google LLC*, Case No. 22-2-01103-3 at ¶ 5.2 (Wash. King Cnty. Sup. Ct. Jan. 24, 2022). DC used similar language, and Indiana included similar allegations, that Google employed user interfaces that made it “difficult for consumers to deny Google access to and use of their location information.” Complaint, *State of Indiana v. Google LLC*, Case No. 49D04-2201-PL-002399 at ¶ 145(c) (Ind. Marion Super. Ct. Jan. 24, 2022). Texas generally alleged that Google misrepresented that users could control whether Google collected their location information. See Pet., *State of Texas v. Google LLC*, Case No. 22-01-88230-D at ¶ 112(A) (Victory Cnty. Dist. Ct. Jan. 24, 2022).

Data Privacy Conclusion

The companies that are granted access to information about us can determine opportunities (financial, social, etc.), influence psychological states, erode autonomy, and more. While every Issue Category in this report addresses privacy harms of one variety or another, Data Privacy harms are foundational to the harms underlying many other Issue Categories, as well as the harms discussed by Professors Solove and Citron more broadly. Privacy is a fundamental right, and State AGs are generally doing what they can with the tools at their disposal to safeguard it for consumers.

Data Privacy Methodology Notes

As noted above, the Rovio case could have been placed in the Platform Accountability & Governance Issue Category because the New Mexico State AG raised allegations related to addictive design. Many of the Google location data Cases could also have been placed in the Platform Accountability & Governance Issue Category, as several State AGs' allegations included dark patterns. Pennsylvania's Shopgala/Surveys2Cash settlement could have been placed in the Unwanted Calls & Texts Issue Category, as it included "Do Not Call" violations. New York's action against Fluent could also have been placed in the Unwanted Calls & Texts Issue Category (we collapsed it into that Issue Category in the Cases Grouped-by-Def./Misconduct dataset because of a similar Pennsylvania action against Fluent).¹⁵¹ In the Grouped-by-Def./Misconduct Cases dataset, we combined the eight Google location actions. We also combined New York's and Connecticut's individual actions against the lead generator Ifficient. The FTC brought related actions against Easy Healthcare/Premom (Connecticut noted coordination),¹⁵² Fluent,¹⁵³ and, in 2025, GM/Onstar.¹⁵⁴ The San Diego District Attorney's office

¹⁵¹ Although both actions identified both types of misconduct, Pennsylvania's action seemed to place greater emphasis on the resulting unwanted calls, whereas New York's action seemed to place greater emphasis on the lead generation-style practices (which resulted in fake comments filed with the FCC).

¹⁵² *U.S. v. Easy Healthcare Corp.*, FTC File No. 202-3186 (May 17, 2023), <https://www.ftc.gov/legal-library/browse/cases-proceedings/202-3186-easy-healthcare-corporation-us-v>; Press Release, Attorney General Tong Announces Settlement Over "Premom" Ovulation Tracking App's Data Sharing & Privacy Practices (May 17, 2023), <https://portal.ct.gov/ag/press-releases/2023-press-releases/attorney-general-tong-announces-settlement-over-premom-ovulation-tracking-app-privacy> (noting settlement negotiated in coordination with the FTC).

¹⁵³ *U.S. v. Fluent, L.L.C.*, FTC File No. 192-3230 (July 18, 2023), <https://www.ftc.gov/legal-library/browse/cases-proceedings/1923230-fluent-llc-us-v>.

¹⁵⁴ *In re: Gen. Motors, L.L.C., et al.*, FTC File No. 242-3052 (Jan. 16, 2025), <https://www.ftc.gov/legal-library/browse/cases-proceedings/2423052-general-motors-llc-et-al-matter>.

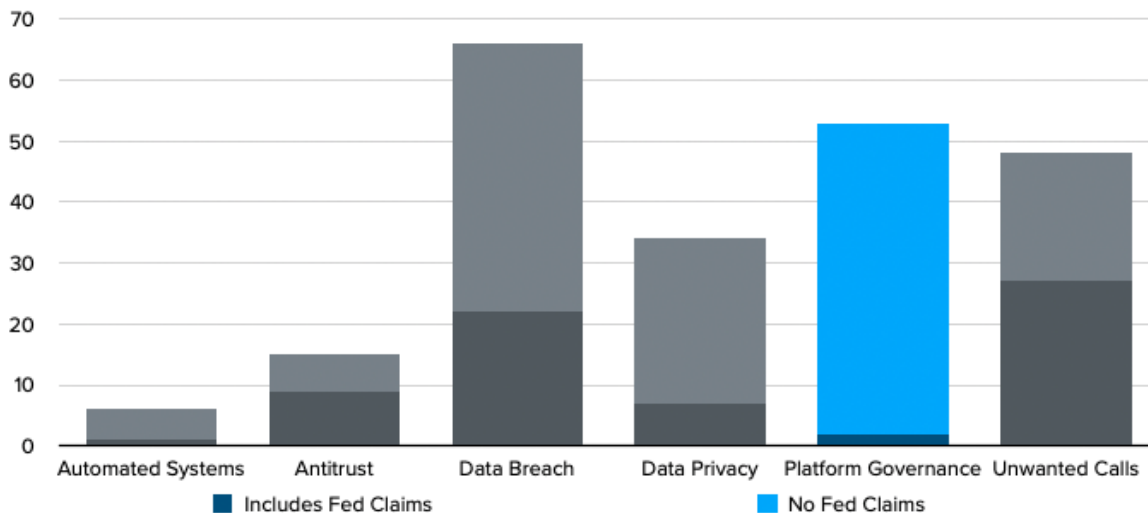
*assisted the New York State AG with the Ifficient, Fluent, Opt-Intelligence, and React2Media settlements.*¹⁵⁵

¹⁵⁵ See Press Release, Attorney General James Issues Report Detailing Millions of Fake Comments, Revealing Secret Campaign to Influence FCC's 2017 Repeal of Net Neutrality Rules (May 6, 2021), <https://ag.ny.gov/press-release/2021/attorney-general-james-issues-report-detailing-millions-fake-comments-revealing>; Press Release, Attorney General James Secures \$615,000 from Companies that Supplied Fake Comments to Influence FCC's Repeal of Net Neutrality Rules (May 10, 2023), <https://ag.ny.gov/press-release/2023/attorney-general-james-secures-615000-companies-supplied-fake-comments-influence>.



Platform Accountability & Governance

INDIVIDUAL CASES BY CATEGORY



Overview of Enforcement Actions in Platform Accountability and Governance

In the past five years, State AGs have increasingly focused on online platforms as especially powerful and in some cases harmful corporate actors. Consumers interact frequently with platforms, increasingly depending on them for crucial functionalities like accessing information, buying goods, searching for jobs, and connecting socially. Although these platforms may bring convenience to many people's lives, they also exposes users to the harms dependence on a small number of companies for accomplishing many tasks.

Like any other industry, unfair and deceptive business practices in the design and provision of online platform products can cause significant consumer harm. Many

platform companies' business models rely on maximizing how much time consumers spend on a platform and how much information can be collected about the user to profile them, both of which generate greater advertising revenues and/or on-platform sales. Companies have developed many ways to increase these metrics, often causing privacy harms in the process. For example, platform companies violate users' privacy at scale to fuel content-recommendation algorithms and advertising. They closely surveil user behavior, collect and retain mass amounts of user data, profile users, and sell user information to third parties for advertising or other types of consumer analytics.¹⁵⁶ Additionally, platform companies use manipulative design practices to take advantage of human psychology to maximize usage of a platform, which can cause many harms.¹⁵⁷ For example, platforms can use dark patterns to frustrate user choice, like making a subscription difficult to cancel. They can deploy usage-maximizing design features like surveillance-based content feeds, infinite scroll, and notifications sent on intermittent variable reward schedules to hack human psychology and keep users online longer. These design tactics can be a lucrative strategy for platforms while harming all consumers – especially minors – in the process.¹⁵⁸

Between 2020 and 2024, with the growing recognition of platform-mediated harms and in the absence of legislative action, State AGs began to investigate and use existing consumer protection laws and tort laws to bring enforcement actions against platforms. Many of these enforcement actions focused on the platform companies' unfair and deceptive business practices, which heightened online safety and privacy risks to consumers and frustrated consumer choice through manipulative design. While many State AGs used traditional consumer protection authority to allege unfair and deceptive practices, other State AGs relied on tort claims like negligence, product liability, and unjust enrichment. Where privacy harms impacted young children, many State AGs

¹⁵⁶ *Comments of EPIC in re the FTC Proposed Trade Regulation Rule on Commercial Surveillance & Data Security*, 7 (Nov. 2022), <https://epic.org/wp-content/uploads/2022/12/EPIC-FTC-commercial-surveillance-ANPRM-comments-Nov2022.pdf>.

¹⁵⁷ See Arvind Narayanan, *Understanding Social Media Recommendation Algorithms*, The Knight First Amend. Inst. at Columbia Univ. 20–22 (2023), https://s3.amazonaws.com/kfai-documents/documents/4a9279c458/Narayanan---Understanding-Social-Media-Recommendation-Algorithms_1-7.pdf.

¹⁵⁸ 5Rights Foundation, *Disrupted Childhood: The Cost of Persuasive Design* 39–49 (April 2023), https://5rightsfoundation.com/wp-content/uploads/2024/08/5rights_DisruptedChildhood_G.pdf.

brought enforcement action under the Children’s Online Privacy Protection Act (COPPA).

The majority of platform-focused enforcement actions concern kids’ online privacy and safety. From 2020 to 2024, the harms that social media platforms can cause kids’ online safety, privacy, and general wellbeing became more widely recognized. Whistleblowers and leaks from social media platforms like Meta and TikTok caused those companies to come under increasing fire for disregarding their own research about how certain platform designs harmed users, especially kids.¹⁵⁹ Some of these platform harms included knowingly implementing features that contribute to compulsive use, enabling unwanted adult contact, and promising (but denying) kids the ability to control their exposure to harmful and violent content.

Meanwhile, Congress failed to enact a comprehensive or kids-focused consumer privacy law. State legislators picked up the baton and began introducing and enacting privacy laws with heightened safeguards for minors’ data, but many such state laws did not go into effect until 2024 or 2025. At the same time, State AGs were poised to fill the gap. Between 2020 and 2024, State AGs investigated these harmful business practices both collaboratively and individually. They eventually brought enforcement actions using their existing State Consumer Protection (SCP) authority, tort law, or COPPA against social media platforms and tech giants including Meta, TikTok, Google (YouTube), Aylo (Pornhub), and Snap, Inc.

Nearly a quarter of all State AG enforcement actions between 2020 and 2024 fell in the Platform Accountability & Governance Issue Category.¹⁶⁰ The table below illustrates how most Platform Accountability & Governance Cases were filed jointly or in separate courts alleging similar misconduct. In the Total row, each State AG participating in an enforcement action is counted once. So if thirty states jointly filed a suit against a platform, all thirty would be separately counted towards that total. In the Individual row, that case is counted just once rather than thirty times. The Grouped-by-Def./Misconduct row captures enforcement that was not jointly pursued in the same filing but pursued in a similar time frame addressing the same misconduct. For

¹⁵⁹ See, e.g., Frances Haugen, Statement of Frances Haugen, United States Senate Committee on Commerce, Science, and Transportation, Sub-Committee on Consumer Protection, Product Safety, and Data Security (Oct. 4, 2021) <https://www.commerce.senate.gov/services/files/FC8A558E-824E-4914-BEDB-3A7B1190BD49>.

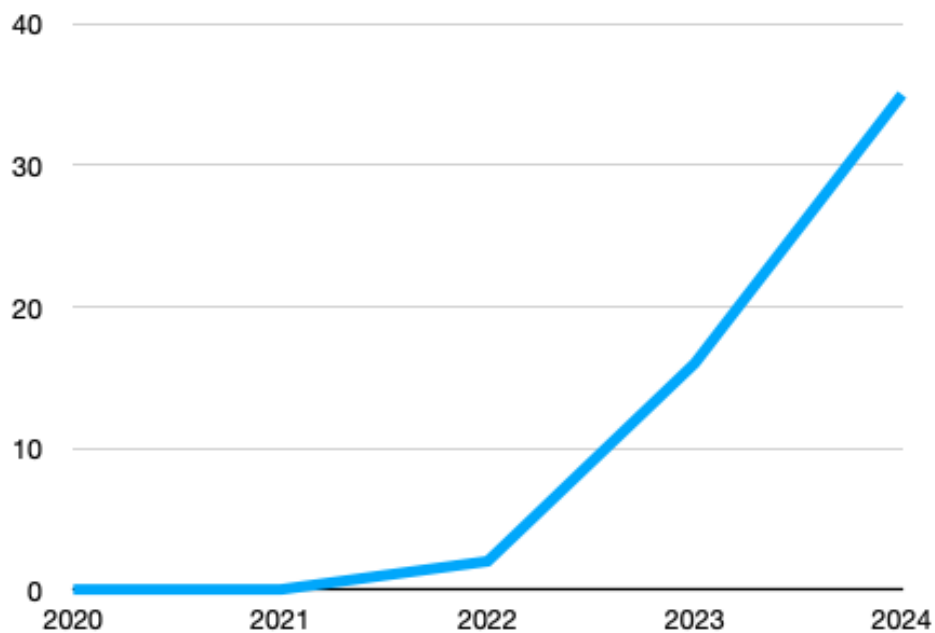
¹⁶⁰ Per the Individual Cases dataset.

example, eighteen State AGs took parallel action against TikTok in their own state courts in 2024; those eighteen Cases are counted as one in the Grouped-by-Def./Misconduct row.

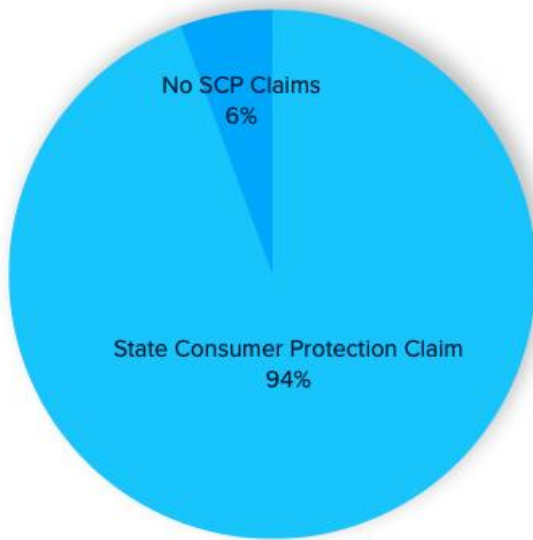
Platform Governance	2020	2021	2022	2023	2024	Grand Total
Total	2	57	48	128	107	342
Individual	0	0	2	16	35	53
Grouped-by-Def./ Misconduct	0	0	2	3	13	18

The table and the chart below also illustrate the dramatic growth in the volume of platform-related enforcement actions after 2022.

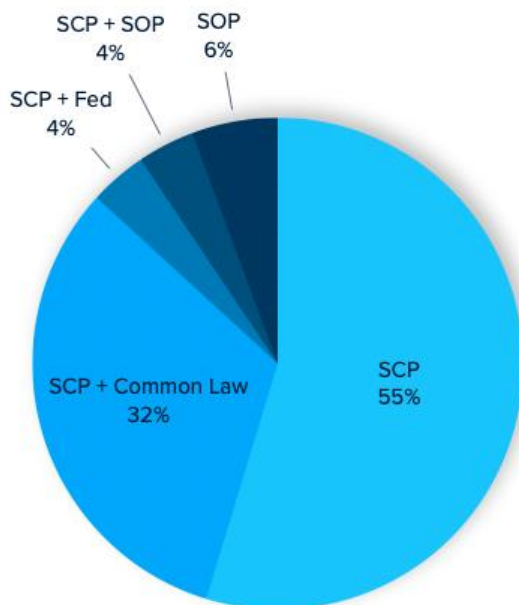
INDIVIDUAL ACTIONS (PLATFORM GOVERNANCE)



INDIVIDUAL PLATFORM GOVERNANCE ACTIONS WITH 1+ SCP CLAIM



INDIVIDUAL PLATFORM GOVERNANCE ACTIONS, BY CLAIM TYPE



Of the Individual platform-related Cases, 94% included a State Consumer Protection law claim. Consumer protection laws vary by state but provide similar, broad authority to protect against unfair and deceptive trade practices.

Less than 4% of Individual Platform Accountability & Governance Cases included federal claims, despite the ability for State AGs to bring enforcement actions under COPPA. The lower pie chart shows the varied claim types that State AGs used to bring platform-related enforcement, largely anchored in consumer protection authority. While a few Cases included COPPA claims, COPPA's scope is limited to certain data use for children under 13. Much of the misconduct alleged impacts teenagers and involves platform design issues that go beyond the limited protections COPPA affords. State AGs included tort or common law claims in addition to consumer protection claims in 32% of Individual Platform Accountability & Governance enforcement actions. Texas pursued a few enforcement actions using newer authority from a pair of Texas kids' online safety laws (State Online Protection, or SOP, in the lower pie chart).

This is likely just the beginning of a long-term trend. State legislators have continued to focus on kids' online privacy and safety issues in recent years, providing State AGs with more specific authority to counter harmful platform design and misconduct online.

Platform Governance Case Studies

This subsection will go into further detail on two waves of State AG actions against TikTok and Meta, both alleging consumer protection claims based on harmful platform design practices impacting kids' online privacy and safety. A broad, bipartisan coalition of State AGs announced an investigation into Meta for these design practices in November 2021, followed by a similarly bipartisan State AG investigation into TikTok in March 2022. Although the two investigations alleged similar harm, the subsequent wave of State AG lawsuits emerging from those investigations varied greatly.

Meta

In October 2023, forty-two State AG filed lawsuits against Meta for designing a social media platform that it knew was harmful to teens. Thirty-three state AGs jointly filed a federal lawsuit in the Northern District of California, while Florida filed a separate lawsuit in a Florida federal court. Seven states and the District of Columbia filed lawsuits in state courts that rely on State Consumer Protection authority. The lawsuits filed in California and Florida federal courts alleged violations of COPPA and various State Consumer Protection laws. The Multistate AGs complaint, along with the Florida and Montana Attorneys General complaints filed in Florida and Montana federal district courts, were consolidated into a broader, ongoing Multidistrict Litigation (MDL) before Judge Gonzalez Rogers in the Northern District of California. In addition to claims against Meta, the MDL includes TikTok, Snapchat, and Google as defendants. The MDL also consolidated plaintiff lawsuits from individual plaintiffs and school districts alongside State AGs. Plaintiffs alleged that defendants' platforms violated consumer protection law, causing harm to teens by designing platforms to encourage compulsive use and maximizing engagement and time online, among other tactics. As of December 31, 2024 (the end of the period covered by this report), the MDL was still ongoing.¹⁶¹

The eight individual State AGs that filed complaints in their respective state courts¹⁶² against Meta adjusted their legal strategies according to state law, with some adding tort claims. While each state complaint included a State Consumer Protection claim, Massachusetts included a public nuisance claim, New Hampshire alleged strict

¹⁶¹ And as of October 1, 2025, the MDL was still ongoing.

¹⁶² DC filed in the DDC.

products liability (defective design and failure to warn) and negligence, and Mississippi also added a negligence claim.

With varied and creative litigation strategies, this broad coalition of State AGs channeled widespread public outrage into a barrage of litigation against Meta for knowingly harming millions of children and teens across the country. State AGs used available consumer protection authority to fill the void where Congress and state legislatures have failed to act, or have not yet acted, to provide them with more specific enforcement authority.

TikTok

State AGs took action against TikTok in October 2024 for violating consumer protection laws, employing platform design features that target and harm young users. Similar to the Meta case, State AGs alleged that TikTok designed its platform to induce excessive and compulsive use, knowingly causing harm and deceiving users and parents regarding platform safety. Unlike the group of State AGs that jointly filed in federal court against Meta, eighteen State AGs filed suit against TikTok separately in their respective state courts. A group of sixteen bipartisan State AGs filed claims against TikTok in October 2024, largely relying on their individual State Consumer Protection laws. New York also added product liability and negligence claims, Massachusetts included a public nuisance claim, and Mississippi included unjust enrichment and negligence in its complaint. Prior to the sixteen State AGs that filed lawsuits in October 2024, Nebraska and New Hampshire sued TikTok in state court in May and June 2024, respectively. While Nebraska's complaint relied solely on State Consumer Protection law, New Hampshire alleged negligence and product liability in addition to violations of the New Hampshire State Consumer Protection law. This wave of litigation in state courts around the country is ongoing, testing the bounds of consumer protection law and tort law in different jurisdictions.

Although State AGs declined to bring an enforcement action under COPPA, it is worth noting that the U.S. Department of Justice (DOJ), acting on a referral by the FTC, filed a complaint in the Central District of California alleging COPPA violations in August 2024—two months prior to the State AGs' lawsuits.¹⁶³

¹⁶³ Complaint, *USA v. ByteDance Ltd.*, Case No. 2:24-cv-06535 (C.D. Cal. Aug. 2, 2024), https://www.ftc.gov/system/files/ftc_gov/pdf/bytedance_complaint.pdf.

Platform Governance Conclusion

State AGs continue to focus effort and resources on combatting platform-related harms to consumers. Emerging technology like companion chatbots and generative AI pose new consumer protection risks to minors and the general population. In the coming years, dozens of state consumer privacy laws, age-appropriate design codes, and other types of platform and data privacy laws will go into effect, providing State AGs with newer, more specific enforcement authority. In the absence of a federal privacy or platform related law, State AGs will likely continue to build on their creative use of general consumer protection authority.

Platform Governance Methodology Notes

Any of the Cases regarding social media feeds could have been placed in the Algorithms & Automated Systems Issue Category. The Florida, Mississippi, Montana, and Multistate coalition Cases against Meta/Instagram, the New Mexico Cases against Meta/Instagram and Snap, the California, Kentucky, Texas, and Utah Cases against TikTok, as well as the Multistate letter urging Meta to abandon a kids-focused Instagram, could all also have been placed in the Data Privacy Issue Category, based on the included allegations and legal authorities relied upon. Arguably, the Multistate letter to Meta/Facebook about preventing user account takeovers by scammers could be considered data security deficiencies and as a result be categorized with the Data Breach actions, but we opted to take a narrower view of what comprised the Data Breach Issue Category.

In the Grouped-by-Def./Misconduct Cases dataset, we aggregated thirteen Cases against Meta/Instagram, nineteen Cases against TikTok alleging addictive feeds, three Cases against TikTok alleging harmful content, two Cases against TikTok alleging sharing data with China, and two Cases against Snap.¹⁶⁴ As noted above, the DOJ brought a complaint against TikTok. The FTC published a report related to concerns about social media and youth in 2024.¹⁶⁵ The

¹⁶⁴ For readers interested in Methodology, this means that for all of the TikTok Cases (including a Texas action that was not combined with any other actions in the Cases Grouped-by-Def./Misconduct dataset), the Total Actions dataset listed 25 actions, the Individual Cases dataset also listed 25 actions as each was brought individually, and the Grouped-by-Def./Misconduct Cases dataset listed 4 actions (addictive feeds, harmful content, data-sharing with China, and a TX action alleging violations of the parental consent provisions of a State Online Protection law).

¹⁶⁵ FTC, *FTC Staff Report Finds Large Social Media and Video Streaming Companies Have Engaged in Vast Surveillance of Users with Lax Privacy Controls and Inadequate Safeguards for Kids and Teens* (Sept. 19, 2024), <https://www.ftc.gov/news-events/news/press-releases/2024/09/ftc-staff-report-finds-large-social-media-video-streaming-companies-have-engaged-vast-surveillance>.

FTC also brought a related action against Amazon (regarding dark patterns) in 2025,¹⁶⁶ and one against Adore Me in 2017.¹⁶⁷

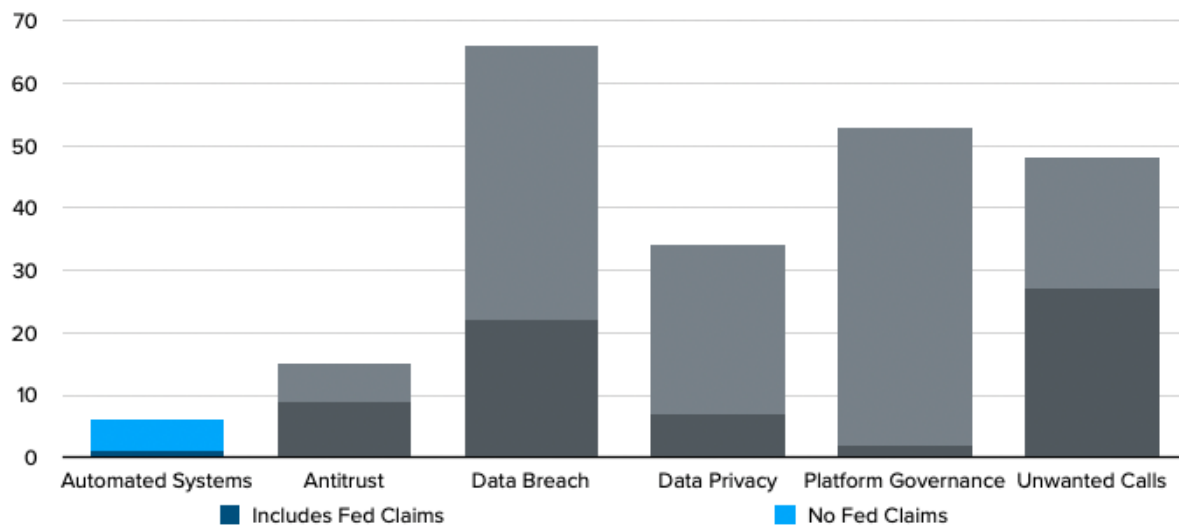
¹⁶⁶ FTC Case Page, *FTC v. Amazon, Inc.*, File No. 2123050, <https://www.ftc.gov/legal-library/browse/cases-proceedings/2123050-amazoncom-inc-rosca-ftc-v> (last updated Sept. 25, 2024).

¹⁶⁷ FTC Case Page, *FTC v. AdoreMe, Inc.*, File No. 1623153, <https://www.ftc.gov/legal-library/browse/cases-proceedings/162-3153-adoreme-inc> (last updated Dec. 5, 2017).



Algorithms & Automated Systems

INDIVIDUAL CASES BY CATEGORY



Algorithms and automated systems rely on personal data to make determinations about us, including recommendations about whether we should get a job, be approved for a mortgage, or have access to life-saving medical care. The power imbalance between individuals and corporations is stark here as well – we are largely kept in the dark about how these systems produce these determinations, whether the systems are fair and accurate, what options we have to challenge erroneous outcomes, and how companies can be held accountable for their usage of defective, discriminatory, or otherwise unlawful systems. According to a 2024 survey conducted by Consumer Reports, more than 90% of Americans said that if determinations were made about

them by an automated decision-making system (ADS) based on incorrect information, they would want the opportunity to correct this information.¹⁶⁸

ADSs impact important aspects of Americans' lives, including housing, health care, education, employment, financial services, public benefits, and the prices of everyday goods and services.¹⁶⁹ The aggregation of sensitive personal data into detailed profiles of individuals exposes us to ever-increasing privacy risks.¹⁷⁰ Indeed, the datasets that power algorithms and automated systems can be attractive targets for hackers or other bad actors.¹⁷¹ Additionally, contrary to the assumption that algorithmic systems will be more objective than a human, there is ample evidence that, in actuality, they often serve to further perpetuate biases. Automated systems are often developed in ways that replicate past discrimination and prejudices, and the lack of transparency surrounding these technologies obfuscates their inner workings under a veil of "objective" processes, enabling developers and deployers to avoid accountability.¹⁷² Some of the most problematic applications of algorithms and automated systems include emotion or attribute recognition, social scoring, one-to-many facial recognition, and nonconsensual deepfakes.¹⁷³

Because the number of enforcement actions we categorized as Algorithms & Automated Systems was so small, we opted to provide the full list of enforcement actions below rather than using the visualizations provided in the other Issue Category sections. As a reminder, "Total Actions" counts each state's participation as a separate enforcement action (even in a joint Multistate action) and includes letters and investigations, not merely cases and settlements. In the table below, we have additionally noted the number of Total "Cases"¹⁷⁴ for the reader's convenience.

¹⁶⁸ See Consumer Reports, *A.I./Algorithmic Decision-Making* 9 (prepared July 9, 2024), <https://advocacy.consumerreports.org/wp-content/uploads/2024/07/CR-AES-AI-Algorithms-Report-7.25.24.pdf>.

¹⁶⁹ See, e.g., EPIC, *Assessing the Assessments* 6 (June 25, 2025), <https://epic.org/assessing-the-assessments/>.

¹⁷⁰ See, e.g., *id.* at 10.

¹⁷¹ See, e.g., *id.* at 7; EPIC, *AI Legislation Scorecard* 8 (June 2024), <https://epic.org/aিসcorecard/> (recommending deletion after training is complete or within 2 years, whichever is shorter).

¹⁷² See, e.g., *Assessing the Assessments* *supra* note 169 at 9.

¹⁷³ See, e.g., *AI Legislation Scorecard* *supra* note 171 at 7.

¹⁷⁴ Recall, "Cases" refers to cases and settlements.

Algorithms & Automated Systems Enforcement Descriptions	Total Actions	Individual Cases	Cases Grouped-by-Def./Misconduct
Equifax	1	1	1
Clearview AI	1	1	1
Buildium	1	1	1
Tenant Turner	1	1	1
ACI	50	1	1
Pieces Technologies	1	1	1
Google Gemini letter	1	n/a	n/a
Investigation into investment advisor use of AI	1	n/a	n/a
Inquiry letter to Madison Square Garden re: use of facial recognition	1	n/a	n/a
Grand Total Enforcement Actions	58 (55 Cases)	6	6

Due to the temporal scope of this report, it captures very few enforcement actions focused specifically on algorithms or ADSs. However, we would expect – and indeed have already seen – increasing enforcement in this area from January 1, 2025, onward. As far as the legal authorities used in these few State AG cases and settlements, State Consumer Protection law was featured in every one. Massachusetts also invoked States Civil Rights law in its tenant screening-related enforcement actions against Buildium and Tenant Turner. Pennsylvania relied on the federal Fair Credit Reporting Act (FCRA) in its action against Equifax for a coding error that resulted in negative score shifts in consumer credit reports. Vermont invoked the state’s fraudulent acquisition of data law¹⁷⁵ in its enforcement action against Clearview AI, a facial recognition company. In its letter¹⁷⁶ to Madison Square Garden Entertainment Corp. (MSG), New York invoked state civil rights law.

¹⁷⁵ Vt. St. Ann. tit. 9, § 2431 (2019), a “State PIP/Breach”-type law.

¹⁷⁶ As a Methodology reminder, we included enforcement actions such as letters and investigations in the “Total” dataset, but not in the “Individual” or “Grouped-by-Def./Misconduct” datasets. The latter two datasets were limited to cases and settlements.

Automated Systems Case Study

As noted above, one-to-many facial recognition is a particularly problematic application of Algorithms & Automated Systems; it enables companies to make often-faulty identifications of people by comparing one face to a large dataset of potential matches. In January 2023, the New York Times reported that lawyers sued MSG for employing an exclusion list to deny certain disfavored attorneys admittance to its venues,¹⁷⁷ identifying banned individuals by using facial recognition (FR) software. Later that same month, the New York AG sent an inquiry letter to the company, calling attention to documented inaccuracy issues with FR technology and reminding the company of New York’s laws against retaliatory and discriminatory conduct.

	Madison Square Garden Entertainment Corp.
Company Size	\$959.3 million annual revenue in 2024
AGs Involved	New York
AG Authorities Involved	State civil rights laws; additionally, State AG notes that facial recognition (FR) software may be biased against people of color and women
Underlying Issue	Using FR software to prohibit all lawyers representing clients in any litigation against the Company (thousands of lawyers from approx. 90 firms) from entering any of the company’s venues in New York, including season ticket holders
Relief Sought	Justification for company’s policy and all efforts undertaken to ensure compliance with all applicable laws and that use of FR technology will not result in discrimination

This enforcement action is interesting for a few reasons. First, it shows a State AG responding quickly to news of a surveillance technology being deployed in a relatively novel commercial context. Second, it is a Single State letter rather than a Multistate letter, which is uncommon for the public letters we came across when looking at press releases. Like many letters, it falls somewhere between an inquiry and a warning, as the State AG seeks more information about the company’s policies but also cites to specific statutes that the company “may” be violating.

¹⁷⁷ MSG’s titular venue is the oldest NBA arena and is a popular venue for other sporting and music events in New York City; other popular spaces owned by the company include Radio City Music Hall, where the Rockettes perform, and the Chicago Theatre.

Automated Systems Conclusion

We anticipate that Algorithms & Automated Systems as an Issue Category will see the biggest growth in State AG enforcement actions in the future compared to 2020–2024. The use of these technologies and systems is becoming increasingly prevalent and is largely unregulated. When harm inevitably occurs, it may occur at a massive scale, attracting the intervention of State AGs.

Automated Systems Methodology Notes

The Vermont case against Clearview AI¹⁷⁸ could also have been placed in the Data Privacy Issue Category, as the State AG’s allegations included unlawful acquisition of consumer data. Montana’s Google Gemini letter could also have been included in the Platform Accountability & Governance Issue Category. Arguably, the ACI and Equifax actions could be considered deficiencies in database integrity and as a result be categorized with the Data Breach actions, but we opted to take a narrower view of what comprised the Data Breach Issue Category. Several state money transmission regulators joined State AGs in the enforcement action against ACI;¹⁷⁹ the CFPB also brought a related action against ACI for the same automated error.¹⁸⁰ In 2025, the CFPB also brought a related action against Equifax.¹⁸¹

¹⁷⁸ Although this case was dismissed on venue grounds, Vermont refiled it in 2025, which is outside the temporal scope of this report. Press Release, *Attorney General Clark Refiles Lawsuit Against Clearview AI for Violations of Consumer Protection Act* (Apr. 25, 2025), <https://ago.vermont.gov/blog/2025/04/25/attorney-general-clark-refiles-lawsuit-against-clearview-ai-violations-consumer-protection-act>.

¹⁷⁹ Cal. Dep’t of Finan. Prot. and Innov., *ACI Worldwide Corp.; ACI Payments, Inc.* (Oct. 16, 2023), https://dfpi.ca.gov/enforcement_action/aci-worldwide-corp-aci-payments-inc/.

¹⁸⁰ CFPB, *ACI Worldwide Corp. and ACI Payments Inc.* (June 27, 2023), <https://www.consumerfinance.gov/enforcement/actions/aci-worldwide-corp-and-aci-payments-inc/>.

¹⁸¹ CFPB, *Equifax, Inc. and Equifax Information Services LLC* (Jan. 17, 2025), <https://www.consumerfinance.gov/enforcement/actions/equifax-inc-and-equifax-information-services-llc/> (see Consent Order at ¶ 100).

V. CONCLUSION

State Attorneys General play a pivotal role in protecting consumers. As our lives have migrated online, so have the sources of consumer harm. As detailed in this report, State AGs have been at the front lines confronting consumer privacy harms that are increasingly prevalent in everyday life. This report focused on six areas of privacy harms within the following issue areas: Unwanted Calls & Texts, Data Breach, Antitrust, Data Privacy, Platform Accountability & Governance, and Algorithms & Automated Systems. In analyzing publicly available enforcement actions within those Issue Categories, this report highlights the extent to which State AGs have collaborated with each other and federal agencies and the types of claims and legal authority that State AGs have used. While State AGs could rely on specific authority in issue areas like Antitrust and Unwanted Calls & Texts, State AG enforcement in other issue areas like Platform Governance and Data Privacy relied mostly on flexible State Consumer Protection laws. The chart at the top of each Issue Category section illustrates the volume of cases or settlements per Issue Category, as well as the proportion of those Cases that rely on federal claims.

To highlight the different trends within the data, this report organized its findings into three datasets (Total Actions, Individual Cases, and Cases Grouped-by-Defendant/Misconduct), enabling readers to understand the data from various angles within each Issue Category.

To recap some of the most notable takeaways from each Issue Category:

- Unwanted Calls & Texts
 - There was a strong reliance on federal claims in Unwanted Calls Cases, as there were decades-old existing federal laws empowering State AGs to address Unwanted Calls.
 - After the formation of the Anti-Robocall Task Force, the vast majority of Unwanted Calls enforcement actions have been Multistate collaborations.
 - This is the only Issue Category to have “Fed.” actions (one state collaborating with one federal agency) for two Cases.
- Data Breach
 - Across the five-year period, State AGs were consistently active in responding to data breaches.
 - The vast majority of state involvement in Data Breach enforcement actions occurred as Multistate actions (91.5%), however some were brought by a

lone state (8.5%). Indeed, no other Issue Category featured in this report had more Multistate actions that involved larger coalitions of State AGs than Data Breach.

- Approximately one third of State AG Data Breach enforcement actions included federal claims (e.g. HIPAA), regardless of whether the calculation was based on the Grouped-by-Def./Misconduct Cases dataset (31.7%) or the Individual Cases dataset (33%). All data breach Cases included at least one State Consumer Protection law claim.
- Antitrust
 - State AGs rarely acted alone, collaborating with each other and federal agencies like DOJ and FTC in the vast majority of Antitrust enforcement actions.
 - This issue category included only Cases, there were no investigations or letters.
 - State AGs relied on federal antitrust law, even where a Multistate coalition did not also include a federal partner.
- Data Privacy
 - With the exception of two Cases, every enforcement action in this issue area alleged violations of State Consumer Protection laws.
 - States generally did not publicly act jointly: the majority of Data Privacy enforcement actions were brought by a single state (90%+), as opposed to a Multistate coalition.
- Platform Accountability & Governance
 - Most of the enforcement actions in this category focused on kids' online privacy and safety, with dramatic growth in the volume of platform-related enforcement actions after 2022.
 - Enforcement in this area relied heavily on State Consumer Protection laws.
 - There was significant collaboration between State AGs to investigate and bring enforcement actions addressing platform-related misconduct.
- Algorithms & Automated Systems
 - This category had few Cases comparatively. Still, there will likely be more action in the future, given the growing prevalence (and lack of federal regulation) of algorithms & automated systems across online systems.

Recommendations for Continued Research

This report serves as a starting point, and we have endeavored to provide some insight into trends within a specific time period. As we worked on this project, we encountered many interesting questions that we wished we had time to explore further. We encourage groups or interested parties to dive into the data and build on our analysis. Some potential research areas include:

- Granular analysis of State AGs' use of consumer protection authority to address privacy harms across the six issue areas. For example, within the enforcement actions that include State Consumer Protection claims, what would the data reveal about how State AGs use flexible consumer protection authority like unfairness or deception?¹⁸²
- The role of federal legal authorities and federal agencies. What might be the impact or strategy behind the use of federal legal authorities and/or filing jointly with federal agencies?
- Category-specific analysis based on relevant expertise. Given a reader's expertise as an attorney or staff at a State AG's office, or a subject matter expert in antitrust or algorithms, what other notable trends does the data reveal?

The Role of this Report Going Forward

This report provides a snapshot of the critical work of State AGs are undertaking as online systems present increasing risks to consumers and our privacy. The five-year window of the report provides a snapshot of how State AGs have used flexible consumer protection authority and federal authority available to them. However, there are limitations to the UDAP that make it an imperfect tool for addressing online tracking and privacy violations. In these next five years, State AGs around the country will add valuable authority to their enforcement toolkits as dozens of state consumer privacy laws go into effect. Under new, more specific powers granted through state privacy laws like the Maryland Online Data Privacy Act (MODPA) and the Vermont Age-Appropriate Design Code (VTAADC), State AGs will have express authority to protect consumer privacy where previously it may have been difficult to do so. For example, it is unlawful under MODPA to sell sensitive data, and the VTAADC prohibits certain abusive data processing or design practices. While State AGs can bring enforcement actions under general state consumer protection laws to combat these harms, clearer rules provide more and better opportunities for enforcement. It is critical, however, that legislatures ensure that state privacy laws are actually fit for purpose. These laws must contain meaningful limits on data collection and use, to avoid, in the

¹⁸² EPIC intends to publish analysis in follow up to this report that focuses specifically on the use of unfairness authority across these five years of privacy-related State AG enforcement actions. We welcome collaboration.

words of Connecticut’s Attorney General, an “exploitable” notice-and-choice standard that hampers enforcement and allows privacy harms to continue.¹⁸³

EPIC is eager to support State AGs as they continue this vital work and is happy to speak with any State AGs or interested readers about this report or privacy enforcement generally. Please feel free to contact EPIC at stateagreport@epic.org.

As the federal government continues to curtail regulatory resources and meaningful consumer protection work, State AGs will be (even more so) on the front lines of the fight for consumer privacy. Equipped with more specific authority in the coming years, State AGs are poised build on their growing body of enforcement work to rein in privacy harms in the digital age.

¹⁸³ Conn. Att’y Gen., *Updated Enforcement Report Pursuant to Conn. Data Priv. Act*, Conn. Gen. Stat. §42-515, *et seq.* 10 (Apr. 2025), https://portal.ct.gov/-/media/ag/press_releases/2025/updated-enforcement-report-pursuant-to-connecticut-data-privacy-act-conn-gen-stat-42515-et-seq.pdf; for legislative recommendations, *see* EPIC and Consumer Reports, *State Data Privacy Act: A Proposed Compromise by Consumer Privacy Advocates*, EPIC & Consumer Reports (Apr. 2025), <https://epic.org/state-data-privacy-act>.

VI. APPENDICES

Overview of Appendices

We have supplemented this report with six appendices for those interested in additional information and context about State AG privacy enforcement actions. Appendices 1 and 2 provide information about the specific enforcement actions that formed the basis for the main body of the report. Appendix 3 helps the reader understand how we classified Claims in the main body of the report. Appendix 4 describes non-enforcement actions that we believe serve to help strengthen State AGs' ability to pursue enforcement actions.¹⁸⁴ Appendix 5 reframes the data collected and presents it for each State AG, with added information that we were unable to include in our main report datasets. Appendix 6 is an index of data visualizations.

Appendix 1. Individual Cases Dataset is a data sheet; it lists all of the Cases (cases and settlements), the year, the number of State AGs involved if it was a multistate action or the postal abbreviation if only one State AG was involved in the action, the Issue Category, and what general types of relevant legal Claims were invoked in the enforcement action.¹⁸⁵ This is the Individual Cases dataset. It does not contain letters or investigations to maintain focus on explicit Claims information – letters and investigations are included in the next Appendix.

Appendix 2. Public Investigations and Letters is also a data sheet; it primarily contains letters and investigations not included in the Individual or Grouped-by-Def./Misconduct Cases datasets (but were reported on in the Total Actions dataset). There are a few actions not included in Appendix 2 (e.g. if company or Claims information was unavailable, or it was unclear whether the action occurred within the temporal scope of the report) – these are listed in Appendices 4 and 5. As a reminder, we did not count a letter or investigation if there was a subsequent case/settlement (because that would amount to counting the same action twice), but we did note a State AG's participation in an investigation if that State AG did not subsequently bring suit (even if a different State AG participating in the same multistate investigation did).

¹⁸⁴ But which would still not be considered policy or advocacy.

¹⁸⁵ We say “relevant” legal claims because we did not include claims that fell outside the scope of this report; for instance, claims related to medical waste disposal or to fraud were not included.

There are no Antitrust Actions in Appendix 2, because to the extent that there were publicly announced letters or investigations, they related to a Case counted in the Individual Cases dataset (Appendix 1) within the 2020–24 time period.

Appendix 3. State Laws Taxonomy is a data glossary of sorts; it delineates the taxonomy of our types of Claims, listing out many of the statutes and regulations that formed the basis for the Claims values in Appendix 1. Appendix 3 is meant to be illustrative, not comprehensive.

Appendix 4. Investments in Enforcement Resources highlights a few efforts related to the infrastructure of enforcing against privacy harms, such as Memoranda of Understanding (MOUs) and standing up dedicated teams within a State AG’s office. Appendix 4 is also meant to be illustrative, not comprehensive.

Appendix 5. Respective State AG Data is a series of mini-reports using State AG-level data. Whereas the rest of this report has been focused on nationwide trends in State AG enforcement actions, Appendix 5 presents the data as it relates to each individual State AG. As noted above, this State AG-level information will sometimes include enforcement actions that could not appear elsewhere in our reporting due to insufficient data. This is as complete as we could make it based on available data; we welcome more information from State AGs as we intend for the report to serve as an accurate historical record.

Appendix 6. Data Visualizations is a visual index of the graphs, charts, and tables that appear in the main body of the report. It presents the data visualizations in the order in which they appear in the report, noting the page number and section. Appendix 6 should be easy to skim and use to locate a specific visualization.

Appendix 1: Individual Cases Dataset

Appendix 1 lists all of the Cases (cases and settlements), the year, the number of State AGs involved if it was a multistate action or the relevant postal abbreviation if not, the Issue Category, and what general types of relevant legal Claims were invoked in the enforcement action. It does not contain letters or investigations because we wanted to focus on explicit Claims information (letters and investigations can be found in Appendix 2).

As a reminder, the main body of the report contained data not only from this Individual Cases dataset, but also from the Grouped-by-Def./Misconduct Cases dataset and the Total Actions dataset. The Individual Cases dataset reports information at the case- or settlement-level, not at the individual State AG level, so a Multistate (or Fed. & Multistate) case/settlement is only listed once in Appendix 1, regardless of how many states participated in it. The first column indicates how many State AGs were involved if it was a multistate Case or lists a single postal abbreviation if the action was not a multistate enforcement action.

We used *italics* in the table below to note where there were other cases brought against the same defendant for similar misconduct. There were two multistate Google ad tech Antitrust Cases, one brought in Texas and one brought in Virginia; we appended their Descriptions with “(TX)” and “(VA)” respectively.

State AG or # State AGs	Year	Description	Multistate/ Fed	Category	Claims
52	2020	Google (search) (w/ DOJ)	Fed. & Multistate	Antitrust	Sherman
48	2020	Facebook (antitrust)	Multistate	Antitrust	Sherman; Clayton
47	2020	Home Depot	Multistate	Data Breach	State Consumer Protection; State PIP/Breach
43	2020	<i>Anthem</i>	<i>Multistate</i>	<i>Data Breach</i>	<i>HIPAA; State Consumer</i>

					<i>Protection; State PIP/Breach</i>
28	2020	Community Health Systems (CHS)	Multistate	Data Breach	HIPAA; State Consumer Protection; State PIP/Breach
27	2020	Sabre	Multistate	Data Breach	State Consumer Protection; State PIP/Breach
15	2020	Google (ad tech) (TX)	Multistate	Antitrust	<i>Sherman; State Antitrust; State Consumer Protection</i>
8	2020	Spiller/Mears/Shapiro/Rising Eagle	Multistate	Unwanted Calls & Texts	TCPA; FCC regs; State Telemarketing; State Consumer Protection
7	2020	CafePress	Multistate	Data Breach	State Consumer Protection; State PIP/Breach
4	2020	Outreach Calling (w/ FTC)	Fed. & Multistate	Unwanted Calls & Texts	TSR
AZ	2020	Valley Delivery	Single State	Data Privacy	State Consumer Protection
AZ	2020	Google (location)	Single State	Data Privacy	<i>State Consumer Protection</i>
CA	2020	Anthem	Single State	Data Breach	<i>HIPAA; State Consumer Protection</i>
CA	2020	Glow	Single State	Data Privacy	State Health Privacy; State Consumer Protection
CO	2020	Fit Turf	Single State	Unwanted Calls & Texts	State Consumer Protection

CT	2020	Spark Energy	Single State	Unwanted Calls & Texts	TCPA; State Consumer Protection
KS	2020	Caney Guest Home	Single State	Data Breach	State Consumer Protection
KS	2020	SearchTec	Single State	Data Breach	State Consumer Protection
KS	2020	Pinecrest Nursing Home	Single State	Data Breach	State Consumer Protection
KS	2020	Steven Motors	Single State	Unwanted Calls & Texts	State Telemarketing; State Consumer Protection
KS	2020	Land Run Ads	Single State	Unwanted Calls & Texts	State Telemarketing
MA	2020	Equifax (breach)	Single State	Data Breach	State Consumer Protection; State PIP/Breach
MA	2020	Starion	Single State	Unwanted Calls & Texts	State Telemarketing
MI	2020	MODOK	Single State	Unwanted Calls & Texts	State Consumer Protection
MI	2020	All Access	Single State	Unwanted Calls & Texts	TSR; State Telemarketing; State Consumer Protection
NJ	2020	Wakefern/ShopRite	Single State	Data Breach	HIPAA; State Consumer Protection
NM	2020	Google (GSuite for Education)	Single State	Data Privacy	COPPA; State Consumer Protection; Intrusion upon Seclusion
OH	2020	Globex and Educare (w/ FTC)	Fed.	Unwanted Calls & Texts	TSR

PA	2020	Earl Enterprises	Single State	Data Breach	State Consumer Protection
TX	2020	LeadGen	Single State	Unwanted Calls & Texts	TCPA; FCC regs; State Telemarketing
VA	2020	Skyline Metrics and Aventis	Single State	Unwanted Calls & Texts	TCPA; FCC regs; State Consumer Protection
VT	2020	Clearview AI	Single State	Algorithms & Automated Systems	State Consumer Protection; State PIP/Breach
WA	2020	US Air Ducts	Single State	Unwanted Calls & Texts	State Telemarketing; State Consumer Protection
53	2021	Google (Play)	Multistate	Antitrust	Sherman; State Antitrust; State Consumer Protection
41	2021	AMCA	Multistate	Data Breach	State Consumer Protection; State PIP/Breach
40	2021	ACS (w/ FTC)	Fed. & Multistate	Unwanted Calls & Texts	TSR
AR	2021	501 Pain and Rehab	Single State	Data Breach	State Consumer Protection; State PIP/Breach
CA	2021	Walmart	Single State	Data Breach	State Consumer Protection; State PIP/Breach
CO	2021	SEMA Construction	Single State	Data Breach	State Consumer Protection; State PIP/Breach
CO	2021	Impact MHC	Single State	Data Breach	State Consumer Protection; State PIP/Breach
DC	2021	<i>Amazon (antitrust)</i>	<i>Single State</i>	<i>Antitrust</i>	<i>State Antitrust</i>

ID	2021	Senior Supplemental Referral Services	Single State	Data Privacy	State Consumer Protection
IN	2021	Startel	Single State	Unwanted Calls & Texts	TSR; TCPA; FCC regs; State Telemarketing
KS	2021	Kansas Food Compliance Center	Single State	Unwanted Calls & Texts	State Telemarketing
KS	2021	Genesis Clubs	Single State	Unwanted Calls & Texts	State Telemarketing
NJ	2021	RCCA	Single State	Data Breach	HIPAA; State Consumer Protection
NJ	2021	CMI/SCI	Single State	Data Breach	HIPAA; State Consumer Protection
NJ	2021	Diamond Fertility	Single State	Data Breach	HIPAA; State Consumer Protection
NM	2021	Rovio Angry Birds	Single State	Data Privacy	COPPA; State Consumer Protection; Intrusion upon Seclusion
NM	2021	TinyLabs/SDK and Google/AdMob	Single State	Data Privacy	COPPA; State Consumer Protection; Intrusion upon Seclusion
NY	2021	Filters Fast	Single State	Data Breach	State Consumer Protection; State PIP/Breach
NY	2021	<i>Fluent</i>	<i>Single State</i>	<i>Data Privacy</i>	<i>State Consumer Protection</i>
NY	2021	React2Media	Single State	Data Privacy	State Consumer Protection

NY	2021	Opt-Intelligence	Single State	Data Privacy	State Consumer Protection
OR	2021	Gustafon	Single State	Data Breach	State Consumer Protection; State PIP/Breach
VT	2021	Strategic IT Partner	Single State	Unwanted Calls & Texts	State Consumer Protection
WA	2021	Global Grid	Single State	Unwanted Calls & Texts	State Telemarketing; State Consumer Protection
WI	2021	Nationwide Transfer	Single State	Unwanted Calls & Texts	State Telemarketing
46	2022	Carnival Cruise	Multistate	Data Breach	State Consumer Protection; State PIP/Breach
40	2022	T-Mobile	Multistate	Data Breach	State Consumer Protection; State PIP/Breach
40	2022	Experian Info Solutions/ T-Mobile	Multistate	Data Breach	State Consumer Protection; State PIP/Breach
40	2022	Experian Data Corp/Court Ventures	Multistate	Data Breach	State Consumer Protection; State PIP/Breach
40	2022	<i>Google (location)</i>	<i>Multistate</i>	<i>Data Privacy</i>	<i>State Consumer Protection</i>
7	2022	Wawa	Multistate	Data Breach	State Consumer Protection; State PIP/Breach
2	2022	Herff Jones	Multistate	Data Breach	State Consumer Protection; State PIP/Breach
2	2022	Avalon	Multistate	Data Breach	State Consumer Protection; State PIP/Breach

CA	2022	Sephora	Single State	Data Privacy	State Comprehensive Privacy; State Consumer Protection
CO	2022	Savory Spice	Single State	Data Breach	State Consumer Protection; State PIP/Breach
DC	2022	Google (location)	Single State	Data Privacy	State Consumer Protection
FL	2022	SmartBiz	Single State	Unwanted Calls & Texts	TCPA; TSR; State Consumer Protection
FL	2022	MV Realty	Single State	Unwanted Calls & Texts	TSR; State Consumer Protection
IN	2022	Google (location)	Single State	Data Privacy	State Consumer Protection
IN	2022	TikTok (youth, harmful content)	Single State	Platform Accountability & Governance	State Consumer Protection
IN	2022	TikTok (data to China)	Single State	Platform Accountability & Governance	State Consumer Protection
KS	2022	McPherson	Single State	Data Breach	State Consumer Protection
MA	2022	Buildium	Single State	Algorithms & Automated Systems	State Civil Rights; State Consumer Protection
MA	2022	Tenant Turner	Single State	Algorithms & Automated Systems	State Civil Rights; State Consumer Protection
MA	2022	Aveanna Healthcare	Single State	Data Breach	HIPAA; State Consumer Protection; State PIP/Breach

MA	2022	TradeSource	Single State	Data Breach	State Consumer Protection; State PIP/Breach
NC	2022	Articul8	Single State	Unwanted Calls & Texts	TSR; State Consumer Protection
NJ	2022	Weichert	Single State	Data Breach	GLBA; State Consumer Protection
NY	2022	EyeMed	Single State	Data Breach	State Consumer Protection; State PIP/Breach
NY	2022	Zoetop/SHEIN	Single State	Data Breach	State Consumer Protection; State PIP/Breach
NY	2022	Wegmans	Single State	Data Breach	State Consumer Protection; State PIP/Breach
OH	2022	G4Telecom	Single State	Unwanted Calls & Texts	TSR; TCPA; State Consumer Protection
PA	2022	Hanna Andersson	Single State	Data Breach	State Consumer Protection; State PIP/Breach
PA	2022	Indra Energy	Single State	Unwanted Calls & Texts	TSR; State Telemarketing
PA	2022	Fluent	Single State	Unwanted Calls & Texts	TSR; State Telemarketing; State Consumer Protection
TX	2022	Google (biometrics)	Single State	Data Privacy	State Biometric Privacy
TX	2022	Facebook (biometrics)	Single State	Data Privacy	State Consumer Protection; State Biometric Privacy
TX	2022	Google (location and Incognito searches)	Single State	Data Privacy	State Consumer Protection

VT	2022	Karabell	Single State	Unwanted Calls & Texts	TSR; State Telemarketing; State Consumer Protection
VT	2022	TCA VoIP	Single State	Unwanted Calls & Texts	TSR; TCPA; State Consumer Protection; State Telemarketing
WA	2022	<i>Google (location)</i>	<i>Single State</i>	<i>Data Privacy</i>	<i>State Consumer Protection</i>
WI	2022	NCWC	Single State	Unwanted Calls & Texts	State Telemarketing
50	2023	ACI	<i>Multistate</i>	<i>Algorithms & Automated Systems</i>	<i>State Consumer Protection</i>
50	2023	<i>Blackbaud</i>	<i>Multistate</i>	<i>Data Breach</i>	<i>HIPAA; State Consumer Protection; State PIP/Breach</i>
49	2023	Avid	Multistate	Unwanted Calls & Texts	TSR; TCPA; State Consumer Protection; State Telemarketing
33	2023	Inmediata	Multistate	Data Breach	HIPAA; State Consumer Protection; State PIP/Breach
33	2023	<i>Meta/ Instagram</i>	<i>Multistate</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection; COPPA</i>
32	2023	AdoreMe	Multistate	Platform Accountability & Governance	State Consumer Protection
19	2023	<i>Amazon (antitrust) (w/ FTC)</i>	<i>Fed. & Multistate</i>	<i>Antitrust</i>	<i>Sherman; FTCA; State Consumer Protection; State Antitrust</i>
17	2023	<i>Google (ad tech) (w/ DOJ) (VA)</i>	<i>Fed. & Multistate</i>	<i>Antitrust</i>	<i>Sherman</i>

6	2023	Morgan Stanley	Multistate	Data Breach	State Consumer Protection; State PIP/Breach
5	2023	Google (location)	Multistate	Data Privacy	State Consumer Protection
4	2023	EyeMed	Multistate	Data Breach	HIPAA; State Consumer Protection; State PIP/Breach
2	2023	DNA Diagnostics	Multistate	Data Breach	State Consumer Protection
2	2023	Premom	Multistate	Data Privacy	State Consumer Protection; State PIP/Breach
AR	2023	Meta/ Instagram	Single State	Platform Accountability & Governance	Public Nuisance; State Consumer Protection; Unjust Enrichment
AR	2023	TikTok (youth, harmful content)	Single State	Platform Accountability & Governance	State Consumer Protection
AR	2023	TikTok (data to China)	Single State	Platform Accountability & Governance	State Consumer Protection
AZ	2023	Old Town AC	Single State	Unwanted Calls & Texts	TSR; State Telemarketing; State Consumer Protection
AZ	2023	Solar Xchange (w/ FTC)	Fed.	Unwanted Calls & Texts	TSR; State Telemarketing
CA	2023	Kaiser Medical	Single State	Data Breach	State Health Privacy; State Consumer Protection
CA	2023	Google (location)	Single State	Data Privacy	State Consumer Protection
CA	2023	MV Realty	Single State	Unwanted Calls & Texts	State Telemarketing

CO	2023	Broomfield Skilled Nursing	Single State	Data Breach	State Consumer Protection; State PIP/Breach
CO	2023	<i>Ifficient</i>	<i>Single State</i>	<i>Data Privacy</i>	<i>State Consumer Protection</i>
DC	2023	<i>RealPage and landlords</i>	<i>Single State</i>	<i>Antitrust</i>	<i>State Antitrust</i>
DC	2023	<i>Meta/ Instagram</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
FL	2023	<i>Meta/ Instagram</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection; COPPA</i>
IN	2023	Indiana University	Single State	Data Breach	HIPAA; State Consumer Protection; Failure to Mitigate Harm
IN	2023	<i>MV Realty</i>	<i>Single State</i>	<i>Unwanted Calls & Texts</i>	<i>TPCA; TSR; State Consumer Protection; State Telemarketing</i>
MA	2023	<i>Meta/Instagram</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>Public Nuisance; State Consumer Protection; Unjust Enrichment</i>
MO	2023	TaxSlayer	Single State	Data Privacy	State Consumer Protection
MS	2023	<i>Meta/ Instagram</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection; Unjust Enrichment; Negligence</i>
MS	2023	Depository Trust and Clearing Corporation	Single State	Unwanted Calls & Texts	State Telemarketing
MS	2023	NaturaLawn of America	Single State	Unwanted Calls & Texts	State Telemarketing

NC	2023	MV Realty	Single State	Unwanted Calls & Texts	State Telemarketing
NH	2023	Meta/ Instagram	Single State	Platform Accountability & Governance	State Consumer Protection; Products Liability; Negligence
NJ	2023	MV Realty	Single State	Unwanted Calls & Texts	State Telemarketing; State Consumer Protection
NM	2023	Meta/ Instagram	Single State	Platform Accountability & Governance	State Consumer Protection; Public Nuisance
NY	2023	US Radiology	Single State	Data Breach	State Consumer Protection; State PIP/Breach
NY	2023	Personal Touch	Single State	Data Breach	HIPAA; State Consumer Protection; State PIP/Breach
NY	2023	Marymount Manhattan College	Single State	Data Breach	FERPA; State Consumer Protection; State PIP/Breach
NY	2023	PracticeFirst Medical	Single State	Data Breach	HIPAA; State Consumer Protection; State PIP/Breach
NY	2023	HPBM - law firm	Single State	Data Breach	HIPAA; State Consumer Protection; State PIP/Breach
NY	2023	NY Presbyterian Hospital	Single State	Data Privacy	HIPAA; State Consumer Protection
NY	2023	Patrick Hinchey Spyware Developer	Single State	Data Privacy	State Consumer Protection
NY	2023	Ifficient	Single State	Data Privacy	State Consumer Protection

NY	2023	Message/ Mahanian - Wohl/ Burkman calls	Single State	Unwanted Calls & Texts	State Civil Rights; State Consumer Protection
OH	2023	Sumco/Cox/ Jones/Yim	Single State	Unwanted Calls & Texts	TCPA; TSR; State Consumer Protection
OK	2023	Meta/Instagram	Single State	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
PA	2023	Rutter's/CHR	Single State	Data Breach	State Consumer Protection
PA	2023	AGR and Utilities Marketing	Single State	Unwanted Calls & Texts	TSR; State Telemarketing; State Consumer Protection
PA	2023	AM Protection	Single State	Unwanted Calls & Texts	TSR; State Telemarketing
PA	2023	Mammoth Marketing	Single State	Unwanted Calls & Texts	TSR; State Telemarketing
PA	2023	Dealer Services	Single State	Unwanted Calls & Texts	TSR; State Telemarketing
TN	2023	Meta/Instagram	Single State	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
TX	2023	Yelp	Single State	Platform Accountability & Governance	State Consumer Protection
UT	2023	Meta/Instagram	Single State	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
VT	2023	Meta/Instagram	Single State	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
50	2024	Marriott	Multistate	Data Breach	State Consumer Protection; State PIP/Breach
20	2024	Apple (apps) (w/ DOJ)	Fed. & Multistate	Antitrust	Sherman; State Antitrust; State Consumer Protection

9	2024	<i>Kroger (w/ FTC)</i>	<i>Fed. & Multistate</i>	<i>Antitrust</i>	<i>Clayton; FTCA</i>
8	2024	<i>RealPage (w/ DOJ)</i>	<i>Fed. & Multistate</i>	<i>Antitrust</i>	<i>Sherman</i>
3	2024	Enzo	Multistate	Data Breach	HIPAA; State Consumer Protection; State PIP/Breach
AR	2024	Temu	Single State	Data Privacy	State Consumer Protection; State PIP/Breach; Unjust Enrichment
AR	2024	Google/ YouTube	Single State	Platform Accountability & Governance	Public Nuisance; State Consumer Protection; Unjust Enrichment
AZ	2024	<i>Amazon (antitrust)</i>	<i>Single State</i>	<i>Antitrust</i>	<i>State Antitrust; State Consumer Protection</i>
AZ	2024	<i>RealPage</i>	<i>Single State</i>	<i>Antitrust</i>	<i>State Antitrust; State Consumer Protection</i>
AZ	2024	Amazon (dark patterns)	Single State	Platform Accountability & Governance	State Consumer Protection
CA	2024	Quest Diagnostics	Single State	Data Breach	State Health Privacy; State Consumer Protection
CA	2024	<i>Blackbaud</i>	<i>Single State</i>	<i>Data Breach</i>	<i>HIPAA; State Consumer Protection; State PIP/Breach</i>
CA	2024	Tilting Point	Single State	Data Privacy	COPPA; State Comprehensive Privacy; State Consumer Protection

CA	2024	DoorDash	Single State	Data Privacy	State Comprehensive Privacy; State Online Privacy
CA	2024	Adventist Health	Single State	Data Privacy	State Health Privacy; HIPAA; State Consumer Protection; California Constitution
CA	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
CO	2024	Kroger	<i>Single State</i>	<i>Antitrust</i>	<i>State Antitrust</i>
DC	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
DC	2024	StubHub (dark patterns)	Single State	Platform Accountability & Governance	State Consumer Protection
GA	2024	MV Realty	<i>Single State</i>	<i>Unwanted Calls & Texts</i>	<i>State Consumer Protection</i>
IA	2024	<i>TikTok (youth, harmful content)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
IL	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
IN	2024	Apria Healthcare	Single State	Data Breach	HIPAA; State Consumer Protection; State PIP/Breach
KS	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
KY	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection; Negligence</i>

LA	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
MA	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection; Public Nuisance</i>
MO	2024	<i>MV Realty</i>	<i>Single State</i>	<i>Unwanted Calls & Texts</i>	<i>State Telemarketing</i>
MS	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection; Unjust Enrichment; Negligence</i>
MT	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
NC	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
NC	2024	<i>Exploria</i>	<i>Single State</i>	<i>Unwanted Calls & Texts</i>	<i>State Telemarketing</i>
NE	2024	<i>Change Healthcare</i>	<i>Single State</i>	<i>Data Breach</i>	<i>State Consumer Protection; State PIP/Breach</i>
NE	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
NH	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection; Negligence; Product Liability</i>
NJ	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
NJ	2024	<i>Bumble</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection; State Online Protection</i>
NM	2024	<i>Snap</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection; Public Nuisance</i>

NV	2024	Snap	Single State	Platform Accountability & Governance	State Consumer Protection; Product Liability; Negligence; Unjust Enrichment
NV	2024	Meta/Instagram	Single State	Platform Accountability & Governance	State Consumer Protection; Product Liability; Negligence; Unjust Enrichment
NV	2024	Meta/FB Messenger	Single State	Platform Accountability & Governance	State Consumer Protection; Product Liability; Negligence; Unjust Enrichment
NV	2024	Meta/Facebook	Single State	Platform Accountability & Governance	State Consumer Protection; Product Liability; Negligence; Unjust Enrichment
NV	2024	TikTok (youth mental health)	Single State	Platform Accountability & Governance	State Consumer Protection; Product Liability; Negligence; Unjust Enrichment
NY	2024	Noblr	Single State	Data Breach	State Consumer Protection; State PIP/Breach
NY	2024	Health Alliance	Single State	Data Breach	State Consumer Protection; State PIP/Breach

NY	2024	National Amusements	Single State	Data Breach	State Consumer Protection; State PIP/Breach
NY	2024	AENT	Single State	Data Breach	State Consumer Protection; State PIP/Breach
NY	2024	Refuah Health Center	Single State	Data Breach	HIPAA; State Consumer Protection; State PIP/Breach
NY	2024	GEICO	Single State	Data Breach	State Consumer Protection; State PIP/Breach
NY	2024	Travelers	Single State	Data Breach	State Consumer Protection; State PIP/Breach
NY	2024	College Board	Single State	Data Privacy	State Consumer Protection; State Ed Privacy; State Ed Privacy Regs
NY	2024	4K Apps	Single State	Data Privacy	State Consumer Protection
NY	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection; Product Liability; Negligence</i>
OR	2024	Connexin	Single State	Data Breach	HIPAA; State Consumer Protection
OR	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
PA	2024	<i>Equifax (coding error)</i>	<i>Single State</i>	<i>Algorithms & Automated Systems</i>	<i>FCRA; State Consumer Protection</i>
PA	2024	Shopgala/ Surveys2Cash	Single State	Data Privacy	TSR; State Consumer Protection; State Telemarketing

PA	2024	Titan Gas	Single State	Unwanted Calls & Texts	TSR; State Telemarketing; State Consumer Protection
SC	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
TX	2024	Pieces Technologies	Single State	Algorithms & Automated Systems	State Consumer Protection
TX	2024	GM/Onstar	Single State	Data Privacy	State Consumer Protection
TX	2024	TikTok (parental consent)	Single State	Platform Accountability & Governance	State Consumer Protection; State Online Protection
TX	2024	Aylo	Single State	Platform Accountability & Governance	State Online Protection
TX	2024	Multi Media, LLC	Single State	Platform Accountability & Governance	State Online Protection
TX	2024	Hammy Media, Ltd.	Single State	Platform Accountability & Governance	State Online Protection
UT	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
UT	2024	TikTok (CSAM)	Single State	Platform Accountability & Governance	State Consumer Protection
VT	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>
WA	2024	Kroger	Single State	Antitrust	State Antitrust
WA	2024	<i>TikTok (youth mental health)</i>	<i>Single State</i>	<i>Platform Accountability & Governance</i>	<i>State Consumer Protection</i>

Appendix 2: Public Investigations and Letters

Appendix 2 primarily contains letters and investigations that were reported as part of the Total Actions dataset but were not included in the Individual or Grouped-by-Def./Misconduct Cases datasets. Combining Appendix 1 and Appendix 2 provides a clear view of the total universe of enforcement actions making up the main body of the report. As with Appendix 1, the first column in Appendix 2 indicates how many State AGs were involved if it was a multistate letter or investigation or lists a single postal abbreviation if the action was not a multistate enforcement action.

There are a few actions not included in Appendix 2 (e.g. if it was missing company or Claims information, or it was unclear whether the action occurred within the temporal scope of the report) – these are listed with other State AG-level information in Appendix 5: State AG-Level Data.¹⁸⁶

As a reminder, we did not count a letter or investigation if there was a subsequent case/settlement (because that would amount to counting the same action twice); however we did note a State AG’s participation in an investigation if that State AG did not subsequently bring suit (even if a different state participating in the same multistate investigation did). There are no Antitrust Actions in Appendix 2 because, to the extent that there were publicly announced letters or investigations, they related to a case counted in the Individual Cases dataset (Appendix 1) within the 2020-24 time period.

State or # States	Year	Description	Multistate/ Fed	Category
NY	2020	Investigation: Twitter bitcoin scam hack	Single State	Platform Accountability & Governance
44	2021	Letter: No Instagram for kids	Multistate	Platform Accountability & Governance
4	2021	Letter: No kids Instagram (AZ, CO, ND, PA)	Multistate	Platform Accountability & Governance
2	2021	Investigation: Instagram/Meta youth harm (IA, TX)	Multistate	Platform Accountability & Governance

¹⁸⁶ The only exception to this is the ten remaining recipients of CIDs sent by the Anti-Robocall Task Force in August 2022, which we included in Appendix 4 instead of Appendix 5.

CO	2021	Investigation: Quizlet ads	Single State	Platform Accountability & Governance
IN	2021	Investigation: Amazon censoring conservatives	Single State	Platform Accountability & Governance
IN	2021	Investigation: Apple censoring conservatives	Single State	Platform Accountability & Governance
IN	2021	Investigation: Facebook censoring conservatives	Single State	Platform Accountability & Governance
IN	2021	Investigation: Google censoring conservatives	Single State	Platform Accountability & Governance
IN	2021	Investigation: Twitter censoring conservatives	Single State	Platform Accountability & Governance
51	2022	Investigation: One Eye (ARTF)	Multistate	Unwanted Calls & Texts
24	2022	Letter: AmEx, Mastercard, Visa Credit Card Gun Privacy	Multistate	Data Privacy
18	2022	Letter: FedEx Shipping Gun Privacy	Multistate	Data Privacy
17	2022	Letter: UPS Shipping Gun Privacy	Multistate	Data Privacy
15	2022	Letter: Apple TikTok Age Rating	Multistate	Platform Accountability & Governance
15	2022	Letter: Google TikTok Age Rating	Multistate	Platform Accountability & Governance
14	2022	Investigation: 2021 T-Mobile breach	Multistate	Data Breach
11	2022	Investigation: TikTok youth health	Multistate	Platform Accountability & Governance
10	2022	Letter: Apple repro privacy	Multistate	Data Privacy

2	2022	Investigation: Discord (NJ, NY)	Single State	Platform Accountability & Governance
2	2022	Investigation: Twitch (NJ, NY)	Single State	Platform Accountability & Governance
MI	2022	Investigation: ThinQ subpoena	Single State	Unwanted Calls & Texts
NY	2022	Investigation: 4chan	Single State	Platform Accountability & Governance
NY	2022	Investigation: 8chan	Single State	Platform Accountability & Governance
TX	2022	Investigation: Memorial Hermann Health System	Single State	Data Privacy
51	2023	Letter: NGL Communications (ARTF)	Multistate	Unwanted Calls & Texts
51	2023	Letter: Range (ARTF)	Multistate	Unwanted Calls & Texts
51	2023	Letter: RS Com (ARTF)	Multistate	Unwanted Calls & Texts
51	2023	Letter: Telcast (ARTF)	Multistate	Unwanted Calls & Texts
51	2023	Letter: Telcentris/Voxox (ARTF)	Multistate	Unwanted Calls & Texts
50	2023	Letter: All Access (ARTF)	Multistate	Unwanted Calls & Texts
50	2023	Letter: Lingo (ARTF)	Multistate	Unwanted Calls & Texts
50	2023	Letter: ThinQ (ARTF)	Multistate	Unwanted Calls & Texts
25	2023	Letter: Aylo (Pornhub) loophole	Multistate	Platform Accountability & Governance
23	2023	Letter: Yelp labeling Crisis Pregnancy Centers	Multistate	Platform Accountability & Governance
CT	2023	Letter: 23andMe	Single State	Data Breach
FL	2023	Letter: Apple foreign apps	Single State	Data Privacy

FL	2023	Letter: Google foreign apps	Single State	Data Privacy
NY	2023	Letter: MSG facial recognition	Single State	Algorithms & Automated Systems
51	2024	Letter: AKA Management (ARTF)	Multistate	Unwanted Calls & Texts
51	2024	Letter: CallVox (ARTF)	Multistate	Unwanted Calls & Texts
51	2024	Letter: iDentidad (ARTF)	Multistate	Unwanted Calls & Texts
51	2024	Letter: Inbound Communications (ARTF)	Multistate	Unwanted Calls & Texts
51	2024	Letter: KWK Communications (ARTF)	Multistate	Unwanted Calls & Texts
50	2024	Letter: Life Corp (ARTF)	Multistate	Unwanted Calls & Texts
41	2024	Letter: Meta scammer account takeovers	Multistate	Platform Accountability & Governance
27	2024	Letter: Instagram stop monetizing CSAM	Multistate	Platform Accountability & Governance
21	2024	Letter: UnitedHealth Group	Multistate	Data Breach
21	2024	Letter: Temu/PDD Data to China	Multistate	Data Privacy
AZ	2024	Letter: 23andMe	Single State	Data Breach
MO	2024	Investigation: National Public Data	Single State	Data Breach
MT	2024	Letter: Google Gemini	Single State	Algorithms & Automated Systems
NH	2024	Investigation: Life Corp (NH)	Multistate	Unwanted Calls & Texts
NH	2024	Investigation: Lingo (NH)	Fed. & Multistate	Unwanted Calls & Texts
NJ	2024	Annual examination of investment advisors, use of AI	Single State	Algorithms & Automated Systems
TX	2024	Investigation: Character.AI	Single State	Platform Accountability & Governance

TX	2024	Investigation: Discord	Single State	Platform Accountability & Governance
TX	2024	Investigation: Instagram	Single State	Platform Accountability & Governance
TX	2024	Investigation: Reddit	Single State	Platform Accountability & Governance

Appendix 3: State Laws Taxonomy

State Antitrust¹⁸⁷

AK	Alaska Restraint of Trade Act, Alaska Stat. § 45.50.562 - .596.
AZ	Uniform State Antitrust Act, Ariz. Rev. Stat. § 44-1401 <i>et seq.</i>
AR	The Arkansas Unfair Practices Act, Ark. Code Ann. § 4-75-201 <i>et seq.</i> and Arkansas Law on Monopolies Ark. Code Ann. § 4-75-301 <i>et seq.</i>
CA	Cartwright Act, Cal. Bus. & Prof. Code § 16700 <i>et seq.</i>
CO	Colorado Antitrust Act of 1992, Colo. Rev. Stat. § 6-4-101 <i>et seq.</i>
CT	Connecticut Antitrust Act, Conn. Gen. Stat. § 35-24 <i>et seq.</i>
DE	Delaware Antitrust Act (“DAA”), Del. Code Ann. tit. 6, § 2101 <i>et seq.</i>
DC	District of Columbia Antitrust Act, D.C. Code § 28-4501 <i>et seq.</i>
FL	The Florida Antitrust Act, Fla. Stat. § 542.15 <i>et seq.</i>
ID	Idaho Competition Act, Idaho Code §§ 48-104 and 48-105.
IN	Chapter Two of the Indiana Antitrust Act, Ind. Code §§ 24-1-2-1 and 24-1-2-2.
IA	Iowa Code § 553.1 <i>et seq.</i>
KY	Ky. Rev. Stat. § 367.175.
ME	Maine Monopolies and Profiteering Law, Me. Stat. tit. 10 § 1102.
MD	The Maryland Antitrust Act, Md. Code Ann., Com. Law § 11-201 <i>et seq.</i>
MI	Michigan Antitrust Reform Act, Mich. Comp. Laws § 445.771 <i>et seq.</i>
MN	Minnesota Antitrust Law of 1971, Minn. Stat. § 325D.49-325D.66.
MS	Miss. Code Ann. § 75-21-1 <i>et seq.</i>
MO	Missouri Antitrust Law, Mo. Rev. Stat. § 416.011 <i>et seq.</i>
NE	Unlawful Restraint of Trade Act, Neb. Rev. Stat. § 59-801 <i>et seq.</i>
NV	Nevada Unfair Trade Practice Act, Nev. Rev. Stat. § 598A.010 <i>et seq.</i>
NH	N.H. Rev. Stat. Ann. § 356 <i>et seq.</i>
NJ	New Jersey Antitrust Act, N.J. Stat. Ann. § 56:9-1 <i>et seq.</i>
NY	Donnelly Act, N.Y. Gen. Bus. Law § 340 <i>et seq.</i>
NC	N.C. Gen. Stat. §§ 75-1, 75-2, and 75-2.1.
ND	Uniform State Antitrust Act, North Dakota Century Code (N.D.C.C.) § 51-08.1-01 <i>et seq.</i>
OK	Oklahoma Antitrust Reform Act, 79 Okla. Stat. tit. 79 § 201 <i>et seq.</i>
OR	Or. Rev. Stat. 646.705 <i>et seq.</i>
PA	Pennsylvania Antitrust Common Law.

¹⁸⁷ Some states (e.g. Massachusetts, Montana, Pennsylvania) relied upon their State Consumer Protection law in bringing Antitrust actions; we reported this in the Claims column of Appendix 1 (Individual Cases Dataset) as State Consumer Protection law rather than as State Antitrust law.

PR	Puerto Rico's Antitrust and Restrictions of Commerce Law, P.R. Laws Ann. tit. 10 § 257 <i>et seq.</i> , and P.R. Laws Ann. tit. 32 § 3341.
RI	Rhode Island Antitrust Act, R.I. Gen. L. § 6-36-1 <i>et seq.</i>
SD	S.D. Codified Laws § 37-1-3.1 <i>et seq.</i>
TX	Tex. Bus. & Com. Code Ann. § 15.01 <i>et seq.</i>
UT	Utah Antitrust Act, Utah Code Ann. § 76-10-3101.
VA	Virginia Antitrust Act, Va. Code Ann. § 59.1-9.1 <i>et seq.</i>
WA	Washington Consumer Protection Act, Wash. Rev. Code § 19.86.020.
WV	West Virginia Antitrust Act, W.Va. Code § 47-18-1 <i>et seq.</i>
WI	Wisconsin's Antitrust Act, Wis. Stat. § 133.03 <i>et seq.</i>

State Biometric Privacy

- TX – Texas Capture or Use of Biometric Identifier Act (CUBI), Tex. Bus. & Com. Code Ann. § 503.001.

State Comprehensive Privacy

- CA – California Consumer Privacy Act (CCPA), Cal. Civ. Code § 1798.100 *et seq.*, Cal. Code Regs. tit. 11 § 7070 *et seq.*

State Consumer Protection

AL	Ala. Code § 8-19-1 <i>et seq.</i>
AK	Alaska Stat. § 45.50.471 <i>et seq.</i>
AZ	Arizona Consumer Fraud Act, Ariz. Rev. Stat. § 44-1521 <i>et seq.</i>
AR	Arkansas Deceptive Trade Practices Act, Ark. Code Ann. § 4-88-101 <i>et seq.</i>
CA	Cal. Bus. & Prof. Code § 17200 <i>et seq.</i>
CO	Colo. Rev. Stat. § 6-1-101 <i>et seq.</i>
CT	Connecticut Unfair Trade Practices Act, Conn. Gen. Stat. § 42-110b <i>et seq.</i>
DE	Consumer Fraud Act, Del. Code. Ann. tit. 6 § 2511 <i>et seq.</i>
DC	Consumer Protection Procedures Act, D.C. Code § 28-3901 <i>et seq.</i>
FL	Florida Deceptive and Unfair Trade Practices Act, Fla. Rev. Stat. § 501.201 <i>et seq.</i>
GA	Georgia Fair Business Practices Act, Ga. Code Ann. § 10-1-390 <i>et seq.</i>
HI	Uniform Deceptive Trade Practice Act, Haw. Rev. Stat. §§ 480-2, 481A.
ID	Idaho Consumer Protection Act, Idaho Code § 48-601 <i>et seq.</i>

IL	Illinois Consumer Fraud and Deceptive Business Practices Act, 815 Ill. Comp. Stat. 505/1 <i>et seq.</i>
IN	Deceptive Consumer Sales Act, Ind. Code § 24-5-0.5 <i>et seq.</i>
IA	Iowa Consumer Fraud Act, Iowa Code § 714.16
KS	Kansas Consumer Protection Act, K.S.A § 50-623 <i>et seq.</i>
KY	Kentucky Consumer Protection Act, Ky. Rev. Stat. Ann. § 367.110 <i>et seq.</i> , § 367.990.
LA	Unfair Trade Practices and Consumer Protection Law, La. Stat. Ann. § 51:1401 <i>et seq.</i>
ME	Maine Unfair Trade Practices Act, Me. Stat. tit. 5 § 205-A.
MD	Maryland Consumer Protection Act, Md. Code Ann., Com. Law § 13-101 <i>et seq.</i>
MA	Mass. Gen. Laws Ch. 93A.
MI	Michigan Consumer Protection Act, Mich. Comp. Laws § 445.901 <i>et seq.</i>
MN	The Uniform Deceptive Trade Practices Act, Minn. Stat. § 325D.43-.48; Consumer Fraud Act, Minn. Stat. § 325F.68-.694.
MS	Miss. Code Ann. § 75-24-1 <i>et seq.</i>
MO	Missouri Merchandising Practices Act, Mo. Rev. Stat. § 407.010 <i>et seq.</i>
MT	Montana Unfair Trade Practices and Consumer Protection Act, Mont. Code Ann. § 30-14-101 <i>et seq.</i>
NE	Nebraska Consumer Protection Act, Neb. Rev. Stat. § 59-1601 <i>et seq.</i> ; Nebraska Uniform Deceptive Trade Practices Act, Neb. Rev. Stat. § 87-301 <i>et seq.</i>
NV	Nevada Deceptive Trade Practices Act; Nev. Rev. Stat. § 598.0903 <i>et seq.</i>
NH	N.H. Rev. Stat. Ann. § 358-A.
NJ	New Jersey Consumer Fraud Act, N.J. Rev. Stat. Ann. § 56:8-1 <i>et seq.</i>
NM	New Mexico Unfair Practices Act, N.M. Stat. Ann. § 57-12-1 <i>et seq.</i>
NY	N.Y. Exec. Law § 63(12), N.Y. Gen. Bus. §§ 349-350.
NC	N.C. Gen. Stat. § 75-1.1 <i>et seq.</i>
ND	Unlawful Sales or Advertising Practices, N.D. Cent. Code § 51-15-01 <i>et seq.</i>
OH	Ohio Consumer Sales Practices Act, Ohio Rev. Code Ann. § 1345.01 <i>et seq.</i>
OK	Oklahoma Consumer Protection Act, Okla. Stat. tit. 15 § 751 <i>et seq.</i>
OR	Oregon Unlawful Trade Practices Act, Or. Rev. Stat. 646.605 <i>et seq.</i>
PA	Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 Penn. Cons. Stat. § 201-1 <i>et seq.</i>

PR	P.R. Laws Ann. tit. 10 § 257 <i>et seq.</i>
RI	Rhode Island Deceptive Trade Practices Act, R.I. Gen. Laws § 6-13.1-1 <i>et seq.</i>
SC	S.C. Code Ann. § 39-5-10 <i>et seq.</i>
SD	S.D. Codified Laws Ch. 37-24.
TN	Tennessee Consumer Protection Act of 1977, Tenn. Code Ann. §§ 47-18-101 to -134.
TX	Texas Deceptive Trade Practices – Consumer Protection Act, Tex. Bus. & Com. Code Ann. §§ 17.41 – 17.63.
UT	Utah Code §§ 13-11-1 through 23.
VT	Vermont Consumer Protection Act, 9 Vt. Stat. Ann. § 2451 <i>et seq.</i>
VA	Virginia Consumer Protection Act, Va. Code Ann. §§ 59.1-196 through 59.1-207.
WA	Washington Consumer Protection Act, Wash. Rev. Code § 19.86.020.
WV	W. Va. Code § 46A-1-101 <i>et seq.</i>
WI	Fraudulent Representations. Wis. Stat. §§ 100.18(1), 100.26(4), & 100.263.
WY	Wyo. Stat. Ann. § 40-12-101 <i>et seq.</i>

State Ed Privacy and State Ed Privacy Regs

- NY – N.Y. Ed. Law § 2d and N.Y. Comp. Codes R. & Regs. tit. 8 § 121.9.

State Online Privacy

- CA – California Online Privacy Protection Act (CalOPPA), Cal. Bus. & Prof. Code § 22575 *et seq.*

State Online Protection

NJ	New Jersey Internet Dating Safety Act, N.J. Stat. Ann. § 56:8-168 to -174 (“IDSA”), and the Administrative Rules of the New Jersey Division of Consumer Affairs related to Internet Dating Services, 13:45A-6.1 to -6.4.
TX	Securing Children Online through Parental Empowerment (“SCOPE”) Act, Tex. Bus. & Com. Code Ann. §§ 509.001–.002, 509.051–.059, 509.101–.104, & 509.151–.152.
TX	Tex. Civ. Prac. & Rem. Code § 129B.

State PIP/Breach

AL	Data Breach Notification Act of 2018, Ala. Code § 8-38-1 <i>et seq.</i>
AK	Alaska Stat. § 45.48.010 <i>et seq.</i>
AZ	Ariz. Rev. Stat. Ann. § 18-552.
AR	Personal Information Protection Act, Ark. Code Ann. § 4-110-101 <i>et seq.</i>
CA	Cal. Civ. Code § 1798.81.5, .82.
CO	Colo. Rev. Stat. § 6-1-713.5 and Colo. Rev. Stat. § 6-1-716.
CT	Safeguarding of Personal Information, Conn. Gen. Stat. § 42-471; Breach of Security, Conn. Gen. Stat. § 36a-701b.
DE	Delaware Data Breach Notification Law, Del. Code Ann. tit. 6 § 12B-100.
DC	District of Columbia Consumer Security Breach Notification Act, D.C. Code § 28-3851 <i>et seq.</i>
FL	Florida Information Protection Act, Fla. Rev. Stat. § 501.171.
GA	Georgia Personal Identity Protection Act, Ga. Code Ann. §§ 10-1-910 through 915.
HI	Security Breach of Personal Information, Haw. Rev. Stat. § 487N; Personal Information Protection, Haw. Rev. Stat. § 487J.
ID	Identity Theft, Idaho Code § 28-51-104 <i>et seq.</i>
IL	Illinois Personal Information Protection Act, 815 Ill. Comp. Stat. 530/1 <i>et seq.</i>
IN	Disclosure of Security Breach Act, Ind. Code § 24-4.9 <i>et seq.</i>
IA	Personal Information Security Breach Protection Act, Iowa Code § 715C.
KS	The Wayne Owen Act, Kan. Stat. Ann. § 50-6,139b; Security Breach Notification Act, Kan. Stat. Ann. § 50-7a01 <i>et seq.</i>
KY	Ky. Rev. Stat. § 365.732.
LA	Database Security Breach Notification Law, La. Rev. Stat. § 51:3071 <i>et seq.</i>
ME	Maine Notice of Risk to Personal Data Act, Me. Stat. tit. 10 § 1346 <i>et seq.</i>
MD	Maryland Personal Information Protection Act, Md. Code Ann., Com. Law § 14-3501 <i>et seq.</i>
MA	Mass. Gen. Laws Ch. 93H; 201 Mass. Code Regs. 17.00.
MI	Identity Theft Protection Act, Mich. Comp. Laws § 445.61 <i>et seq.</i>
MN	Minnesota Data Breach Notification Statute, Minn. Stat. § 325E.61, and Minnesota Health Records Act, Minn. Stat. §§ 144.291-144.34.
MS	Miss. Code Ann. § 75-24-29.
MO	Mo. Rev. Stat. § 407.1500.
MT	Montana Impediment of Identity Theft Act, Mont. Code Ann. § 30-14-1701 <i>et seq.</i>

NE	Financial Data Protection and Consumer Notification of Data Security Breach Act of 2006, Neb. Rev. Stat. § 87-801 <i>et seq.</i>
NV	Nevada Security and Privacy of Personal Information Act; Nev. Rev. Stat. § 603A.010 <i>et seq.</i>
NH	N.H. Rev. Stat. Ann. § 359-C: 19-21.
NJ	New Jersey Identity Theft Prevention Act, N.J. Stat. Ann. §§ 56:8-161 to -166.
NM	Data Breach Notifications Act, N.M. Stat. Ann. § 57-12C-1 <i>et seq.</i>
NY	N.Y. Gen. Bus. Law §§ 899-aa & 899-bb.
NC	Identity Theft Protection Act, N.C. Gen. Stat. § 75-60 <i>et seq.</i>
ND	Notice of Security Breach for Personal Information N.D. Cent. Code § 51-30-01 <i>et seq.</i>
OH	Security Breach Notification Act, Ohio Rev. Code Ann. § 1349.19 <i>et seq.</i>
OK	Security Breach Notification Act, Okla. Stat. tit. 24 § 161 <i>et seq.</i>
OR	Oregon Consumer Information Protection Act, Or. Rev. Stat. 646A.600 <i>et seq.</i>
PA	Breach of Personal Information Notification Act, 73 Penn. Cons. Stat. § 2301 <i>et seq.</i>
RI	Rhode Island Identity Theft Protection Act, R.I. Gen Laws § 11-49.3-1 <i>et seq.</i>
SC	South Carolina Data Breach Notification Law, S.C. Code Ann. § 39-1-90.
SD	S.D. Codified Laws Ch. 22-40.
TN	Tennessee Identity Theft Deterrence Act of 1999, Tenn. Code Ann. §§ 47-18-2101 to -2111.
TX	Identity Theft Enforcement and Protection Act, Tex. Bus. & Com. Code Ann. §§ 521.001 – 152.
UT	Utah Protection of Personal Information Act, Utah Code § 13-44-101 <i>et seq.</i>
VT	9 V.S.A §§ 2430, 2431; Vermont Security Breach Notice Act, 9 Vt. Stat. Ann. § 2435.
VA	Virginia Breach of Personal Information Notification Law, Va. Code Ann. §§ 18.2-186.6.
WA	Washington Data Breach Notification Law, Wash. Rev. Code § 19.255.010 <i>et seq.</i>
WV	W. Va. Code § 46A-2A-101 <i>et seq.</i>
WI	Notice of Unauthorized Acquisition of Personal Information. Wis. Stat. § 134.98.
WY	Wyo. Stat. Ann. § 40-12-501 <i>et seq.</i>

State Telemarketing

AZ	Arizona Telephone Solicitations Act, Ariz. Rev. Stat. Ann. §§ 44-1271 to -1282.
AR	Ark. Code Ann. § 4-99-201(a)(2).
CA	California Do Not Call Law, Cal. Bus. & Prof. Code § 17590 <i>et seq.</i>
CT	Conn. Gen. Stat. § 16-245 <i>et seq.</i>
IN	Indiana Telephone Solicitation of Consumers Act, Ind. Code § 24-4.7; the Indiana Regulation of Automatic Machines Dialing Act, Ind. Code § 24-5-14.
KS	Kansas No-Call Act, Kan. Stat. Ann. 50-670a.
MD	Maryland Telephone Consumer Protection Act (the “MTCPA”) Md. Code Ann., Com. Law § 14-3201 <i>et seq.</i>
MA	Massachusetts Telemarketing Solicitation Act, codified at Mass. Gen. Laws Ch. 159C.
MI	Michigan Home Solicitation Sale Act, Mich. Comp. Laws 445.111 <i>et seq.</i>
MS	Mississippi Telephone Solicitation Act, Miss. Code Ann. § 77-3-701 <i>et seq.</i>
MO	Missouri Do-Not-Call Law, Mo. Rev. Stat. § 407.1070 <i>et seq.</i> ; Missouri Telemarketing Practices Act, Mo. Rev. Stat. § 407.1095 <i>et seq.</i>
NV	Nevada Telecommunication Solicitation Act, Nev. Rev. Stat. §§ 228.500 to 228.590, also known as Nevada’s Do Not Call Law; Ch. 597 <i>et seq.</i>
NJ	N.J. Stat. Ann. § 56:8-128(a); N.J. Admin Code § 13:45D-4.1(a)1.
NC	N.C. Gen. Stat. § 75-100, <i>et seq.</i>
ND	N.D. Cent. Code § 51-15-02; North Dakota Telephone Solicitations Act, N.D. Cent. Code § 51-28-01 <i>et seq.</i>
PA	Telemarketer Registration Act, 73 Penn. Cons. Stat. § 2242 <i>et seq.</i>
RI	Rhode Island Telephone Sales Solicitation Act (“TSSA”), R. I. Gen. Laws § 5-61-1 <i>et seq.</i>
TX	Texas Telemarketing Disclosure and Privacy Act, Tex. Bus. & Com. Code § 304.001 <i>et seq.</i> (“Texas No Call Act”).
VT	Vt. Stat. Ann. tit. 9 § 2464a.
WA	Washington Automatic Dialing and Announcing Device Statute (WADAD), Wash. Rev. Code § 80.36.400.
WI	Wis. Stat. § 100.52(3); Wis. Admin. Code § ATCP 127 <i>et seq.</i>

State Civil Rights

MA	Mass. Gen. Laws Ch. 151B § 4(6).
NY	New York Civ. Rights Law §§ 40-c, and 40-d.

State Health Privacy

- CA – Confidentiality of Medical Information Act (CMIA), Cal. Civ. § 56.06.

Appendix 4: Investments in Enforcement Resources

Appendix 4 highlights a few efforts related to investing in enforcement against privacy harms, such as Memoranda of Understanding (MOUs) and standing up dedicated teams within a State AG’s office. Appendix 4 is meant to be illustrative not comprehensive.

State AGs undertook a multitude of public efforts between 2020 and 2024 to strengthen their respective abilities to effectuate enforcement actions in response to the threat of consumer privacy harms. These include partnerships with other states, partnerships with federal agencies, collaborations with other stakeholders, and internal, State AG-specific strategic and organizational decisions to prioritize certain programs, initiatives, or units.

Multistate Partnerships

In this subsection, we note a few examples of public collaborations amongst State AGs. Most prominently during this time period, within the Unwanted Calls & Texts Issue Category, State AGs formed the Anti-Robocall Task Force: a coalition of 50 states plus DC dedicated to ending illegal robocalls – for example, by investigating and taking legal action against the telecommunications companies responsible for bringing most of the overseas-based robocalls into the United States.¹⁸⁸ In the same August 2022 press release in which it debuted, the Task Force announced that it sent a Civil Investigative Demand (CID) out to each of twenty gateway providers.¹⁸⁹ While ten of these providers

¹⁸⁸ *Attorney General Yost Announces the Formation of National Anti-Robocall Litigation Task Force* (Aug. 2, 2022), <https://www.ohioattorneygeneral.gov/Media/News-Releases/August-2022/Attorney-General-Yost-Announces-the-Formation-of-N> (further noting that “[i]n many cases, the bad actors appear to be intentionally turning a blind eye in return for steady revenue. The task force is focusing on shutting down companies that profit from the illegal robocalls so that companies following the rules benefit.”).

¹⁸⁹ *See, e.g., Attorney General Josh Stein Leads New Nationwide Anti-Robocall Litigation Task Force* (Aug. 2, 2022), <https://ncdoj.gov/attorney-general-josh-stein-leads-new-nationwide-anti-robocall-litigation-task-force/> (“I’m proud to create this nationwide task force to hold companies accountable when they turn a blind eye to the robocallers they’re letting on to their networks so they can make more

have since been publicly named through subsequent enforcement actions, the other ten have not. Because we do not know these companies' names, we did not include them in any of our datasets,¹⁹⁰ and, because 51 State AGs sent these CIDs, we have chosen to include that information in this Appendix rather than on each individual State AG's page in Appendix 5.

Although it is definitively outside the temporal scope of this report (as it was publicly announced in April 2025), we must also acknowledge here within the Data Privacy Issue Category the bipartisan Consortium of Privacy Regulators.¹⁹¹

Federal Partnerships

In this subsection, we note a few examples of public collaborations between State AGs and federal agencies; these collaborations appear here in Appendix 4 because they pertain to cooperation generally, rather than collaboration within the context of any specific enforcement action.¹⁹²

money. I've already brought one pathbreaking lawsuit against an out-of-state gateway provider, and I won't hesitate to take legal action against others who break our laws and bombard North Carolinians with these harmful, unlawful calls."); *Attorney General Todd Rokita Announces the Formation of a Nationwide Bipartisan Anti-Robocall Litigation Task Force* (Aug. 2, 2022), https://events.in.gov/event/attorney_general_todd_rokita_announces_the_formation_of_a_nationwide_bipartisan_anti-robocall_litigation_task_force ("If the telecom industry won't police itself, this unprecedented task force will.").

¹⁹⁰ Our Methodology required that we deduplicate related enforcement actions (e.g. not count an investigation and a related, subsequent settlement as distinct enforcement actions), so it would be inappropriate for us to include an enforcement action in our reporting if we did not know the target company.

¹⁹¹ Press Release, *Minnesota and New Hampshire Join Bipartisan Consortium as Privacy Collaboration Continues Growing Nationwide*, Cal. Priv. Prot. Agency (Oct. 8, 2025), <https://cppa.ca.gov/announcements/2025/20251008.html>.

¹⁹² That said, to facilitate more efficient reading in the main report, we consolidate the citations for the FCC's actions from the Methodology subsection of the Unwanted Calls & Texts Issue Category section (*supra* note 99) into a string cite here. See, e.g., *Robocall Facilitators Must Cease and Desist*, FCC, <https://www.fcc.gov/robocall-facilitators-must-cease-and-desist> (last visited Oct. 1, 2025) (hereinafter FCC Cease and Desist Page); *FCC Assesses Over \$5M Forfeiture for Unlawful Robocalls*, FCC (Jun. 6, 2023), <https://www.fcc.gov/document/fcc-assesses-over-5m-forfeiture-unlawful-robocalls>; *FCC Issues First-Ever RoboBlocking Order Against One Eye*, FCC (May 11, 2023), <https://www.fcc.gov/document/fcc-issues-first-ever-roboblocking-order-against-one-eye>; *FCC Proposes Nearly \$300M Fine Against Auto Warranty Scam Robocaller*, FCC (Dec. 23, 2022),

Within the Unwanted Calls & Texts Issue Category, many states participated in the Federal Trade Commission (FTC)'s "Project Point of No Entry"¹⁹³ and "Operation Stop

<https://www.fcc.gov/document/fcc-proposes-nearly-300m-fine-against-auto-warranty-scam-robocaller>; *FCC Denies Spoofed Robocall Operation's Petition for Reconsideration*, FCC (Jun. 7, 2023), <https://www.fcc.gov/document/fcc-denies-spoofed-robocall-operations-petition-reconsideration>; *FCC Warns Providers About Robocalls from PhoneBurner and MV Realty*, FCC (Jan. 24, 2023), <https://www.fcc.gov/document/fcc-warns-providers-about-robocalls-phoneburner-and-mv-realty>; *FCC Takes on Mortgage Scam Robocall Campaign Targeting Homeowners*, FCC (Jan. 24, 2023), <https://www.fcc.gov/document/fcc-issues-robocall-cease-and-desist-letter-twilio>; *FCC Issues Robocall Cease-and-Desist Letter to Lingo Telecom*, FCC (Feb. 6, 2024), <https://www.fcc.gov/document/fcc-issues-robocall-cease-and-desist-letter-lingo-telecom>; *FCC Issues Robocall Cease-and-Desist Letter to Identidad*, FCC (Oct. 18, 2024), <https://www.fcc.gov/document/fcc-issues-robocall-cease-and-desist-letter-identidad>; *FCC Issues Robocall Cease-and-Desist Letter to RSCOM*, FCC (Mar. 18, 2021), <https://www.fcc.gov/document/fcc-issues-robocall-cease-and-desist-letter-rscom>; *FCC Issues Robocall Cease-and-Desist Letter to thinQ*, FCC (Mar. 22, 2022), <https://www.fcc.gov/document/fcc-issues-robocall-cease-and-desist-letter-thinq>; *Robocall Facilitators Must Cease and Desist*, FCC, <https://www.fcc.gov/robocall-facilitators-must-cease-and-desist> (last accessed Oct. 20, 2025).

¹⁹³ See, e.g., Press Release, *FTC Ramps Up Fight to Close the Door on Illegal Robocalls Originating from Overseas Scammers and Imposters*, FTC (Apr. 11, 2023), <https://www.ftc.gov/news-events/news/press-releases/2023/04/ftc-ramps-fight-close-door-illegal-robocalls-originating-overseas-scammers-imposters> ("Through the FTC's enforcement efforts and its collaboration with partners, such as the Industry Traceback Group (ITG), the Federal Communications Commission (FCC), and state attorneys general, Project PoNE has uncovered the activity of 24 target point of entry service providers responsible for routing and transmitting illegal robocalls between 2021 and 2023, in connection with approximately 307 telemarketing campaigns, including government and business imposters, COVID-19 relief payment scams, and student loan debt relief and forgiveness schemes, among others. According to ITG, a single campaign often represents hundreds of thousands or millions of calls.").

Scam Calls”,¹⁹⁴ or signed robocall-specific MOUs with the Federal Communications Commission (FCC).¹⁹⁵

Within the Data Breach and Data Privacy Issue Categories, in December 2023, the FCC announced partnerships between four State AGs and its then-newly formed Privacy and Data Protection Task Force.¹⁹⁶ By October 2024, more than ten State AGs in total had signed similar MOUs.¹⁹⁷

Although we generally excluded from this report federal regulatory comments, a coalition of twenty-nine State AGs filed a letter comment with the FTC that is relevant to the topic of strengthening State AG consumer protection enforcement efforts through federal partnership; this was in response to the study Congress directed the FTC to undertake as part of the FTC Collaboration Act of 2021.¹⁹⁸ In short, the State AG coalition letter suggested that several states’ UDAP statutes rely upon the FTC for their

¹⁹⁴ See, e.g., Press Release, *FTC, Law Enforcers Nationwide Announce Enforcement Sweep to Stem the Tide of Illegal Telemarketing Calls to U.S. Consumers*, FTC (July 18, 2023), <https://www.ftc.gov/news-events/news/press-releases/2023/07/ftc-law-enforcers-nationwide-announce-enforcement-sweep-stem-tide-illegal-telemarketing-calls-us> (“Contributing law enforcers include the Department of Justice, which has announced several civil and criminal actions related to this initiative, as well as the Federal Communications Commission, Social Security Administration Office of the Inspector General, and the U.S. Postal Inspection Service.”); Press Release, *AG Nessel and Law Enforcers Nationwide Announce Enforcement Sweep to Stem the Tide of Illegal Telemarketing Calls to U.S. Consumers* (July 19, 2023), <https://www.michigan.gov/ag/news/press-releases/2023/07/19/ag-nessel-and-law-enforcers-nationwide-announce-enforcement-sweep>.

¹⁹⁵ See, e.g., Press Release, *FCC-State Robocall Investigation Partnerships*, <https://www.fcc.gov/fcc-state-robocall-investigation-partnerships> (last visited Oct. 1, 2025); Press Release, *Idaho Launches Formal Robocall Investigation Partnership with FCC* (Mar. 29, 2022), <https://www.ag.idaho.gov/newsroom/idaho-launches-formal-robocall-investigation-partnership-with-fcc/>; Press Release, *Attorney General Lopez Partners with Federal Communications Commission on Robocall Investigations* (Aug. 3, 2023), <https://ag.hawaii.gov/wp-content/uploads/2023/08/News-Release-2023-34.pdf>.

¹⁹⁶ See, e.g., Press Release, *FCC Privacy & Data Protection Task Force Launches First-Ever Enforcement Partnerships with State Attorneys General* (Dec. 6, 2023), <https://docs.fcc.gov/public/attachments/DOC-398939A1.pdf>; Press Release, *Attorney General Tong Announces Enforcement Partnership with FCC’s Privacy Data Protection Task Force* (Dec. 8, 2023), <https://portal.ct.gov/ag/press-releases/2023-press-releases/attorney-general-tong-announces-enforcement-partnership-with-privacy-and-data-protection-task-force>.

¹⁹⁷ Press Release, *FCC Now Partnering with Ten State Attorneys General on Privacy Protection* (Oct. 21, 2024), <https://docs.fcc.gov/public/attachments/DOC-406791A1.pdf>.

¹⁹⁸ Press Release, *Attorney General Kwame Raoul and Bipartisan Coalition Call for Improved Collaboration with FTC* (Aug. 25, 2023), <https://illinoisattorneygeneral.gov/news/story/attorney-general-kwame-raoul-and-bipartisan-coalition-call-for-improved-collaboration-with-ftc> (led by Connecticut, Illinois, New Hampshire, and Tennessee).

UDAP interpretation, that the FTC can step in where a state agency may be more constrained (e.g. where a State AG's State Consumer Protection Law may not include an explicit cause of action for unfairness), that the FTC's Office of Claims and Refunds helps to facilitate consumer restitution, that the FTC can benefit from State AGs' local knowledge (both in terms of investigative resources and access to consumer victims), and that the State AGs and the FTC have successfully collaborated in enforcement actions, in collecting and compiling consumer complaint data as part of the Consumer Sentinel Network, and in educating consumers about scams and other threats.¹⁹⁹

Collaborations with Other Stakeholders

In this subsection, we note a few examples of public collaborations between State AGs and non-government actors.

Within the Platform Accountability & Governance Issue Category, in 2023, the New Jersey State AG formalized a collaboration with Zillow Group, Inc. to address housing discrimination by detecting and removing advertisements on its platforms²⁰⁰ that discriminate based on source of lawful income or other violations of the state's Fair Chance in Housing Act.²⁰¹ This built upon a 2020 Statement of Collaboration between Zillow and the New Jersey Division on Civil Rights.²⁰²

Within the Unwanted Calls & Texts Issue Category, prior to the formation of the Anti-Robocall Task Force, many State AGs engaged with industry to convince providers

¹⁹⁹ Letter to Hon. April J. Tabor, Secretary, FTC, from William Tong, Connecticut Attorney General, et al. (Aug. 14, 2023), <https://illinoisattorneygeneral.gov/News-Room/Current-News/Comment%20Ltr%20to%20FTC-Sig%20Merge.pdf>. You can find the resulting report by the FTC here: FTC, *Working Together to Protect Consumers: A Study and Recommendations on FTC Collaboration with the State Attorneys General* (Apr. 10, 2024), https://www.ftc.gov/system/files/ftc_gov/pdf/p238400_ftc_collaboration_act_report.pdf.

²⁰⁰ These include Zillow.com, Trulia, Hotpads, and StreetEasy.

²⁰¹ Press Release, AG Platkin, *Division on Civil Rights Announce Expanded Partnership with Zillow Group, Inc. to Address Housing Discrimination* (Apr. 18, 2023), <https://www.njoag.gov/ag-platkin-division-on-civil-rights-announce-expanded-agreement-with-zillow-group-inc-to-address-housing-discrimination/>.

²⁰² State of Collaboration between Zillow Group and the New Jersey Division on Civil Rights (signed Apr. 17, 2023), https://www.nj.gov/oag/newsreleases23/2023-0418_Zillow-NJOAG-Collaboration-Agreement-Executed.pdf.

to commit to anti-robocall principles²⁰³ and to (continue to) facilitate the traceback request process.²⁰⁴

Although we found no examples that fell clearly within the scope of this report, we acknowledge that State AGs sometimes partner with academic institutions as well.²⁰⁵

Single State Programs, Initiatives, and Units

In this subsection, we note a few examples of public, state-internal efforts that suggest an emphasis on combatting privacy harms through enforcement.

Within the Data Privacy and Data Breach Issue Categories, several states announced the formation of divisions, units, initiatives, or other strategic and organizational prioritizations of data privacy and data security within their offices between 2020-24.²⁰⁶ It is important to note that many states already (or formerly) had

²⁰³ See, e.g., Press Release, *Attorney General Ford Continues Commitment to Fight Illegal Robocalls in Nevada* (Feb. 12, 2020), https://ag.nv.gov/News/PR/2020/Attorney_General_Ford_Continues_Commitment_to_Fight_Illegal_Robocalls_in_Nevada/.

²⁰⁴ See, e.g., Press Release, *52 Attorneys General Join Effort to Expand Illegal Robocall Response*, National Association of Attorneys General (May 4, 2020), <https://www.naag.org/press-releases/52-attorneys-general-join-effort-to-expand-illegal-robocall-response/>; Press Release, *Michigan AG Nessel, Ohio AG Yost Lead National Bipartisan Effort to Expand Illegal Robocall Response* (May 4, 2020), <https://www.michigan.gov/ag/news/press-releases/2020/05/04/michigan-ag-nessel-ohio-ag-yost-lead-national-bipartisan-effort-to-expand-illegal-robocall-response>. Additionally, at least four states have also partnered with YouMail, a robocall-blocker consumer app that also assists consumer protection agencies in detecting and determining the origins of illegal robocall campaigns. See, e.g., Press Release, *AG Nessel Joins YouMail Partnership to Combat Robocallers* (Apr. 27, 2022), <https://www.michigan.gov/ag/news/press-releases/2022/04/27/ag-nessel-joins-youmail-partnership-to-combat-robocallers>; Derek B. Johnson, *New Hampshire authorities trace Biden AI robocall to Texas-based telecom*, CyberScoop (Feb. 6, 2024), <https://cyberscoop.com/lingo-life-biden-ai-robocall/>.

²⁰⁵ See, e.g., Press Release, *AG Dana Nessel Announces Partnership with Center for Cybersecurity and Data Science at Ferris State University* (Mar. 24, 2021), <https://www.michigan.gov/ag/news/press-releases/2021/03/24/ag-dana-nessel-announces-partnership-with-center-for-cybersecurity-and-data-science>; Press Release, *Rutledge to Partner with UA Little Rock Tracking False COVID-19 Websites and Scams Online* (Apr. 6, 2020), <http://web.archive.org/web/20200420145244/https://www.arkansasag.gov/media-center/news-releases/rutledge-to-partner-with-ualr-tracking-false-covid-19-websites-and-scams-online/>.

²⁰⁶ See, e.g., Press Release, *AG Healey Announces New Division Focused on Protecting Data Privacy and Security of Massachusetts Consumers* (Aug. 13, 2020), <https://www.mass.gov/news/ag-healey->

units with these focus areas prior to January 2020,²⁰⁷ and that it may be possible for a State AG to address consumer privacy harms without forming a dedicated, titular unit

announces-new-division-focused-on-protecting-data-privacy-and-security-of-massachusetts-consumers; *Attorney General Formella Announces Creation of New Data Privacy Unit* (Aug. 15, 2024), <https://www.doj.nh.gov/news-and-media/attorney-general-formella-announces-creation-new-data-privacy-unit>; *Enforcement Report: The Oregon Consumer Privacy Act* (2024), *The First Sixth Month* 4 (Mar. 2025), <https://www.doj.state.or.us/wp-content/uploads/2025/03/OCPA-Six-Month-Enforcement-Report.pdf> (this Section existed at least as early as December 2024, see *DOJ Survey Finds Most Oregonians Care About Privacy, Curious About New Law* (Dec. 5, 2024), <https://www.doj.state.or.us/media-home/news-media-releases/doj-survey-finds-most-oregonians-care-about-privacy-curious-about-new-law/>); *Attorney General Ken Paxton Launches Data Privacy and Security Initiative to Protect Texans' Sensitive Data from Illegal Exploitation by Tech, AI, and Other Companies* (June 4, 2024), <https://www.texasattorneygeneral.gov/news/releases/attorney-general-ken-paxton-launches-data-privacy-and-security-initiative-protect-texans-sensitive>. Also, implicitly Colorado and Virginia. See, e.g., Phil Nugent, *Featured AI Job: First Assistant Attorney General, Technology and Privacy Protection, State of Colorado* (updated Oct. 26, 2024), <https://www.coloradoai.news/featured-ai-job-first-assistant-attorney-general-technology-and-privacy-protection-state-of-colorado/> (suggesting Colorado State AG's Technology and Privacy Protection Unit was new in October 2024); Samuel E. "Gene" Fishel and Whitney L. Shepherd, *The Rise of State Attorney General Privacy Enforcement*, Troutman Pepper Locke (Oct. 2, 2024), <https://www.troutman.com/insights/the-rise-of-state-attorney-general-privacy-enforcement/> (noting Virginia State AG formed a privacy enforcement unit in 2024).

²⁰⁷ See, e.g., *Spitzer Acts to Protect Internet Privacy* (Mar. 9, 1999), <https://ag.ny.gov/press-release/1999/spitzer-acts-protect-internet-privacy> (notably from 1999); "Defunct Units", <https://msa.maryland.gov/msa/mdmanual/08conoff/attorney/html/06agd.html> (Internet Privacy Unit's functions transferred to Division of Consumer Protection); *Attorney General Kamala D. Harris Announces Privacy Enforcement and Protection Unit* (July 19, 2012), <https://oag.ca.gov/news/press-releases/attorney-general-kamala-d-harris-announces-privacy-enforcement-and-protection>; Ashley L. Taylor, Jr. & Siran Faulders, *Connecticut Attorney General Applauds General Assembly's Passage of Data Breach Notification Legislation*, *Consumer Financial Services Law Monitor* (June 4, 2025), <https://www.consumerfinancialserviceslawmonitor.com/2015/06/connecticut-attorney-general-applauds-general-assemblys-passage-of-data-breach-notification-legislation/> (noting creation of Privacy and Data Security Department earlier that year); *AG Grewal Announces Creation of New Enforcement Unit to Protect Data Privacy of New Jersey's Residents* (May 7, 2018), <https://nj.gov/oag/newsreleases18/pr20180507b.html>; State of Indiana Office of Attorney General Data Privacy and Identity Theft Unit, "Unsolicited Fax Complaint", https://www.in.gov/attorneygeneral/consumer-protection-division/files/Form-1085_Unsolicited-Fax-Complaint_PDF-Form.pdf (suggesting the Data Privacy and Identity Theft Unit has existed since at least as early as 2017); The Sedona Conference, "Technology Resource Panel", <https://web.archive.org/web/20200920183417/https://www.thesedonaconference.org/bio/108533> (suggesting the Illinois State AG's Privacy Unit has existed since at least as early as September 2020); Danielle Keats Citron, *The Privacy Policymaking of State Attorneys General*, 92 *Notre Dame L. Rev.* 747, 756 (2016) (including Ohio identity theft unit within State AG's consumer protection division in list of State AG privacy offices).

for that purpose,²⁰⁸ although it is hard to disagree with the notion that what gets measured gets done. Several State AGs also provide a public repository of breach notices or other public portals or resource centers to help inform consumers about general and specific risks to their data privacy and security.²⁰⁹

Within the Unwanted Calls & Texts Issue Category, at least two State AGs announced robocall-specific units or initiatives within their offices during the 2020-24 time period.²¹⁰

²⁰⁸ See, e.g., Citron *supra* note 207 at 757; see also Alaska Dep't of Law, *ID Theft & Privacy*, <https://law.alaska.gov/departments/civil/consumer/IDtheft.html>; Arizona Attorney General's Office, *Data Privacy & Data Breach Reporting*, <https://www.azag.gov/consumer/data-breach>.

²⁰⁹ See, e.g., Delaware Dep't of Justice, *Personal Data Privacy Portal*, <https://attorneygeneral.delaware.gov/fraud/personal-data-privacy-portal/> (last visited Oct. 1, 2025); Office of the Maine Attorney General, *Data Breach Notifications*, <https://www.maine.gov/agviewer/content/ag/985235c7-cb95-4be2-8792-a1252b4f8318/list.html> (last visited Oct. 1, 2025); Office of the Vermont Attorney General, *Security Breach Notices*, <https://ago.vermont.gov/categories/security-breach-notices> (last visited Oct. 1, 2025); Washington State Office of the Attorney General, *Data Privacy Hub*, <https://www.atg.wa.gov/data-privacy> (last visited Oct. 1, 2025); *Data Breach Resource Center*, <https://www.atg.wa.gov/data-breach-resource-center> (last visited Oct. 1, 2025).

²¹⁰ See, e.g., Press Release, AG Yost Rolls Out Robocall Enforcement Unit, *New Reporting Tool for Consumers* (Mar. 4, 2020), <https://www.ohioattorneygeneral.gov/Media/News-Releases/March-2020/AG-Yost-Rolls-Out-Robocall-Enforcement-Unit-New-Re>; Press Release, *Attorney General Josh Stein Launches Operation Silver Shield with Anti-Robocall Initiative* (Feb. 11, 2020), <https://ncdoj.gov/attorney-general-josh-stein-launches-operation-silver-shield-with-anti-robocall-initiative/>.

Appendix 5: Respective State AG Data

Appendix 5: Respective State AG Data is a series of 55²¹¹ State AG-by-State AG mini-reports. Whereas the rest of this report has been focused on nationwide trends in State AG enforcement actions, Appendix 5 presents the data as it relates to each individual State AG. This State AG-level information will sometimes include enforcement actions that could not appear elsewhere in our reporting due to insufficient data. This Appendix is as complete as we could make it based on available data; we welcome more information from State AGs as we intend for the report to serve as an accurate historical record.

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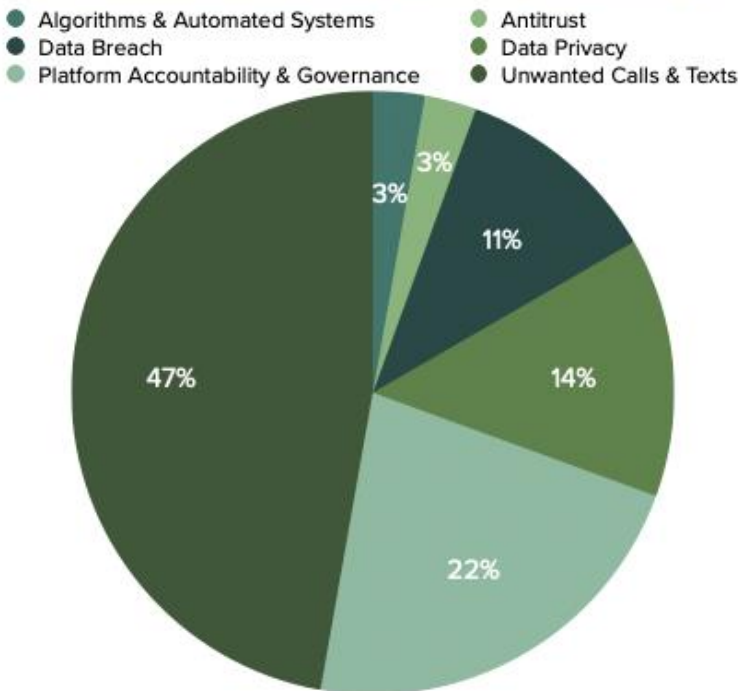
²¹¹ We did not identify any privacy-related enforcement actions that involved the American Samoa State AG.

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SOUTH DAKOTA.....	CXLV
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Alabama

ALABAMA ACTIONS, BY ISSUE CATEGORY



Alabama Enforcement Actions, by Issue Category, by Year

(AL)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust		1				1
Data Breach			1	2	1	4
Data Privacy			4		1	5
Platform Governance			3	3	2	8
Unwanted Calls		1	1	9	6	17
Grand Total		2	9	15	10	36

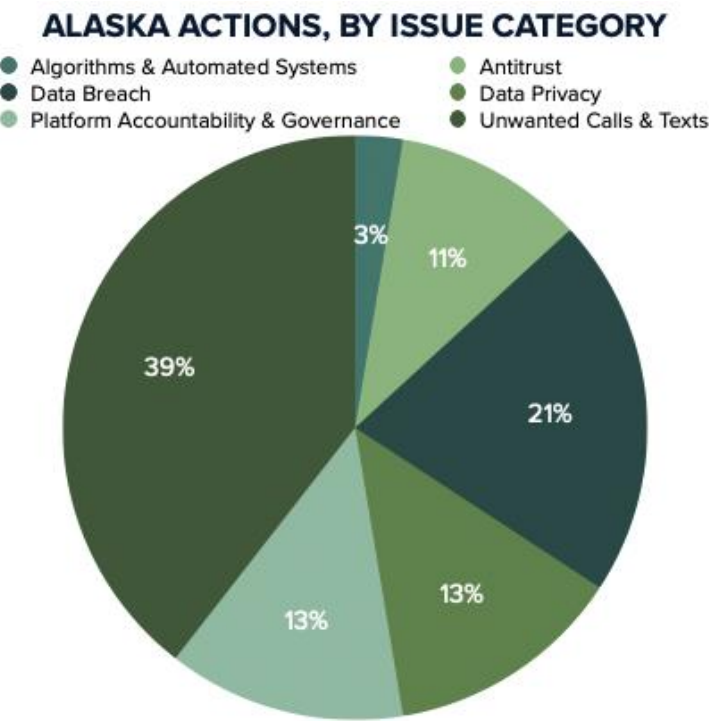
Alabama Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust		1		1
Data Breach		4		4
Data Privacy		5		5
Platform Governance		8		8
Unwanted Calls	1	16		17
Grand Total	1	35		36

Alabama Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust		1		1
Case/Settlement		1		1
Data Breach		4		4
Case/Settlement		4		4
Data Privacy		5		5
Case/Settlement		1		1
Letter		4		4
Platform Governance		8		8
Case/Settlement		1		1
Investigation		1		1
Letter		6		6
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	1	35		36

Alaska



Alaska Enforcement Actions, by Issue Category, by Year

(AK)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	3	1				4
Data Breach	4		2	1	1	8
Data Privacy			4		1	5
Platform Governance		1		2	2	5
Unwanted Calls			1	8	6	15
Grand Total	7	2	7	12	10	38

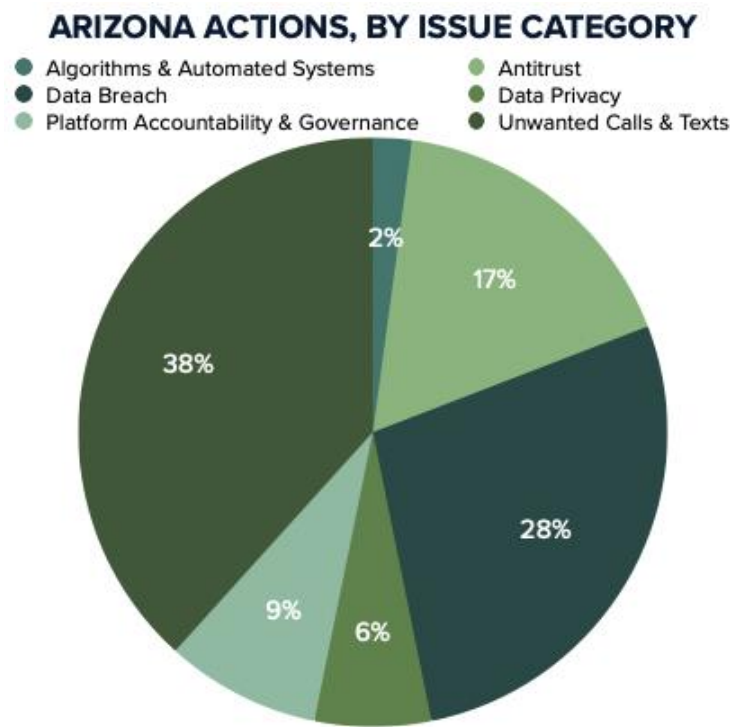
Alaska Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust		4		4
Data Breach		8		8
Data Privacy		5		5
Platform Governance		5		5
Unwanted Calls		15		15
Grand Total		38		38

Alaska Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust		4		4
Case/Settlement		4		4
Data Breach		8		8
Case/Settlement		8		8
Data Privacy		5		5
Case/Settlement		1		1
Letter		4		4
Platform Governance		5		5
Letter		5		5
Unwanted Calls		15		15
Investigation		1		1
Letter		14		14
Grand Total		38		38

Arizona



Arizona Enforcement Actions, by Issue Category, by Year

(AZ)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1	4	8
Data Breach	3	1	4	2	3	13
Data Privacy	2		1			3
Platform Governance		1		1	2	4
Unwanted Calls			1	11	6	18
Grand Total	7	3	6	16	15	47

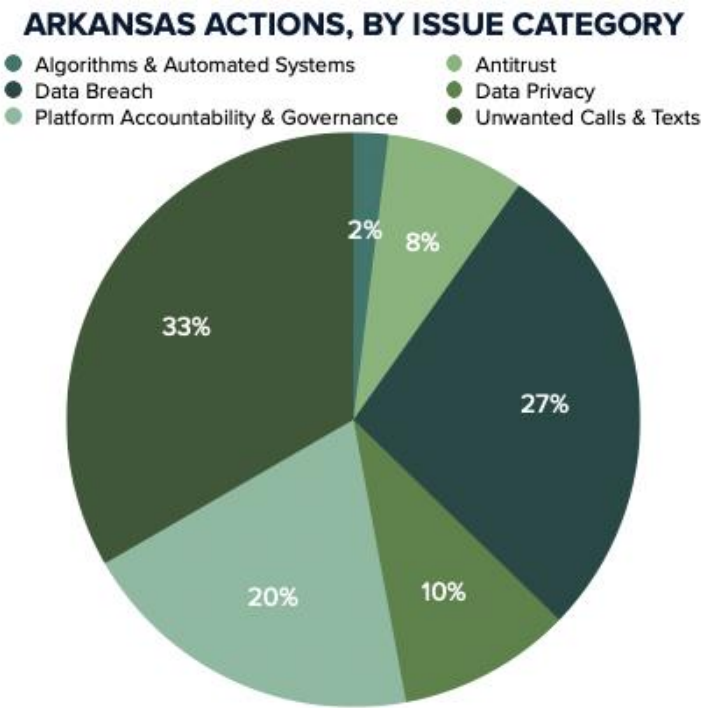
Arizona Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed.	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems			1		1
Antitrust		3	3	2	8
Data Breach			12	1	13
Data Privacy			1	2	3
Platform Governance			3	1	4
Unwanted Calls	1		16	1	18
Grand Total	1	3	36	7	47

Arizona Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed.	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems			1		1
Case/Settlement			1		1
Antitrust		3	3	2	8
Case/Settlement		3	3	2	8
Data Breach			12	1	13
Case/Settlement			11		11
Letter			1	1	2
Data Privacy			1	2	3
Case/Settlement				2	2
Letter			1		1
Platform Governance			3	1	4
Case/Settlement			1	1	2
Letter			2		2
Unwanted Calls	1		16	1	18
Case/Settlement	1		1	1	3
Investigation			1		1
Letter			14		14
Grand Total	1	3	36	7	47

Arkansas



Arkansas Enforcement Actions, by Issue Category, by Year

(AR)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	3	1				4
Data Breach	4	2	5	2	1	14
Data Privacy			4		1	5
Platform Governance			2	6	2	10
Unwanted Calls	1		1	9	6	17
Grand Total	8	3	12	18	10	51

Arkansas Enforcement Actions, by Issue Category, by Year

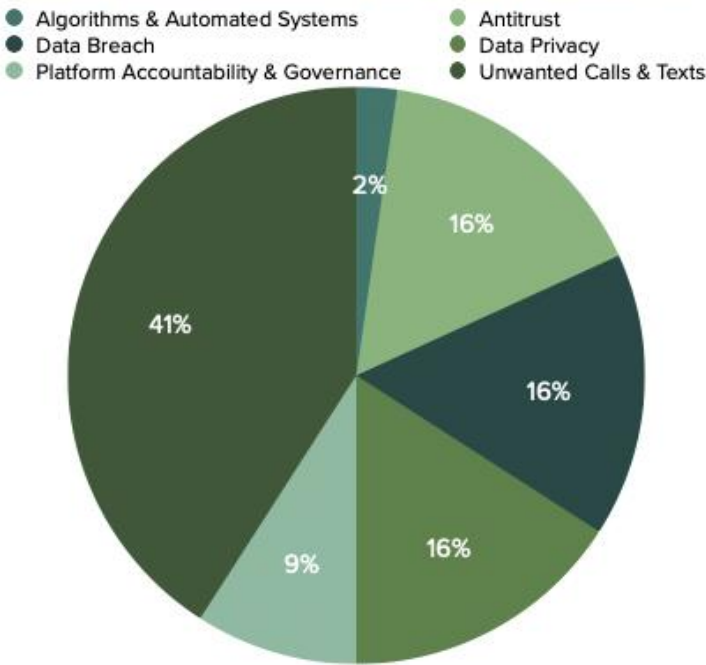
Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	1	3		4
Data Breach		13	1	14
Data Privacy		4	1	5
Platform Governance		6	4	10
Unwanted Calls		17		17
Grand Total	1	44	6	51

Arkansas Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		13	1	14
Case/Settlement		12	1	13
Investigation		1		1
Data Privacy		4	1	5
Case/Settlement		1	1	2
Letter		3		3
Platform Governance		6	4	10
Case/Settlement		1	4	5
Letter		5		5
Unwanted Calls		17		17
Case/Settlement		2		2
Investigation		1		1
Letter		14		14
Grand Total	1	44	6	51

California

CALIFORNIA ACTIONS, BY ISSUE CATEGORY



California Enforcement Actions, by Issue Category, by Year

(CA)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1	3	7
Data Breach	2	1		1	3	7
Data Privacy	1		2	1	3	7
Platform Governance		1		1	2	4
Unwanted Calls		1	1	10	6	18
Grand Total	5	3	3	15	17	44

California Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	5	2		7
Data Breach		2	5	7
Data Privacy		1	6	7
Platform Governance		3	1	4
Unwanted Calls	1	16	1	18
Grand Total	6	25	13	44

California Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	5	2		7
Case/Settlement	5	2		7
Data Breach		2	5	7
Case/Settlement		1	5	6
Letter		1		1
Data Privacy		1	6	7
Case/Settlement			6	6
Letter		1		1
Platform Governance		3	1	4
Case/Settlement		1	1	2
Letter		2		2
Unwanted Calls	1	16	1	18
Case/Settlement	1	1	1	3
Investigation		1		1
Letter		14		14
Grand Total	6	25	13	44

Additional California Enforcement Actions:

- The California AG conducted multiple investigative sweeps from 2022 through 2024. In 2022, the State AG announced an investigative sweep of businesses operating loyalty programs.²¹² In 2023, the California State AG announced a sweep of popular mobile apps²¹³ in the retail, travel, and food service industries that failed to comply with opt-out requests, as well as a sweep of large California employers²¹⁴ regarding privacy protections for employee data. In 2024, the California State AG announced a sweep of streaming apps and devices that do not comply with opt-out requests.²¹⁵
- Although we excluded COVID-19-related information from the scope this report, for clarity's sake, we note that the California State AG brought an action against RealPage for wrongly including COVID-19-related rental debt in tenant screening reports.²¹⁶

²¹² Press Release, *On Data Privacy Day, Attorney General Bonta Puts Businesses Operating Loyalty Programs on Notice for Violations of California Consumer Privacy Act* (Jan. 28, 2022), <https://oag.ca.gov/news/press-releases/data-privacy-day-attorney-general-bonta-puts-businesses-operating-loyalty>.

²¹³ Press Release, *Ahead of Data Privacy Day, Attorney General Bonta Focuses on Mobile Applications' Compliance with the California Consumer Privacy Act* (Jan. 27, 2023), <https://oag.ca.gov/news/press-releases/ahead-data-privacy-day-attorney-general-bonta-focuses-mobile-applications%E2%80%99>.

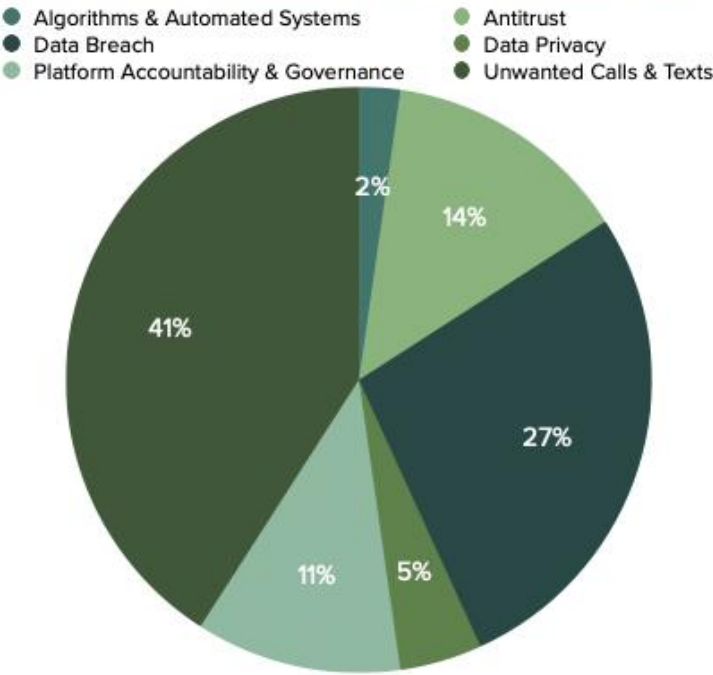
²¹⁴ Press Release, *Attorney General Bonta Seeks Information from California Employers on Compliance with California Consumer Privacy Act* (July 14, 2023), <https://oag.ca.gov/news/press-releases/attorney-general-bonta-seeks-information-california-employers-compliance>.

²¹⁵ Press Release, *Attorney General Bonta Announces Investigative Sweep, Focuses on Streaming Services' Compliance with the California Consumer Privacy Act* (Jan. 26, 2024), <https://oag.ca.gov/news/press-releases/attorney-general-bonta-announces-investigative-sweep-focuses-streaming-services%E2%80%99>.

²¹⁶ Press Release, *Attorney General Bonta Secures \$625,000 Settlements with RealPage and Holland for Violating Tenant Protections* (Dec. 18, 2024), <https://oag.ca.gov/news/press-releases/attorney-general-bonta-secures-625000-settlements-realpage-and-holland-violating>.

Colorado

COLORADO ACTIONS, BY ISSUE CATEGORY



Colorado Enforcement Actions, by Issue Category, by Year

(CO)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1	2	6
Data Breach	2	3	3	3	1	12
Data Privacy			1	1		2
Platform Governance		2	1	1	1	5
Unwanted Calls	1	1	1	9	6	18
Grand Total	5	7	6	16	10	44

Colorado Enforcement Actions, by Issue Category, by Fed/Multistate Status

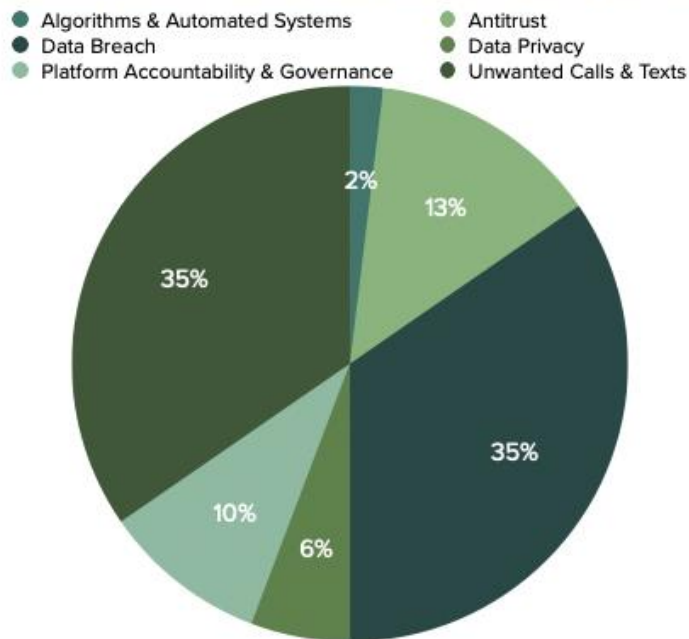
Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	2	3	1	6
Data Breach		8	4	12
Data Privacy		1	1	2
Platform Governance		4	1	5
Unwanted Calls	1	16	1	18
Grand Total	3	33	8	44

Colorado Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	2	3	1	6
Case/Settlement	2	3	1	6
Data Breach		8	4	12
Case/Settlement		8	4	12
Data Privacy		1	1	2
Case/Settlement		1	1	2
Platform Governance		4	1	5
Case/Settlement		1		1
Investigation		1	1	2
Letter		2		2
Unwanted Calls	1	16	1	18
Case/Settlement	1	1	1	3
Investigation		1		1
Letter		14		14
Grand Total	3	33	8	44

Connecticut

CONNECTICUT ACTIONS, BY ISSUE CATEGORY



Connecticut Enforcement Actions, by Issue Category, by Year

(CT)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		2	2	7
Data Breach	5	1	5	4	3	18
Data Privacy			2	1		3
Platform Governance		1	1	2	1	5
Unwanted Calls	1	1	1	9	6	18
Grand Total	8	4	9	19	12	52

Connecticut Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	4	3		7
Data Breach		17	1	18
Data Privacy		3		3
Platform Governance		5		5
Unwanted Calls	1	16	1	18
Grand Total	5	45	2	52

Connecticut Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	4	3		7
Case/Settlement	4	3		7
Data Breach		17	1	18
Case/Settlement		15		15
Investigation		1		1
Letter		1	1	2
Data Privacy		3		3
Case/Settlement		2		2
Letter		1		1
Platform Governance		5		5
Case/Settlement		2		2
Investigation		1		1
Letter		2		2
Unwanted Calls	1	16	1	18
Case/Settlement	1	1	1	3
Investigation		1		1
Letter		14		14
Grand Total	5	45	2	52

Additional Connecticut Enforcement Actions:

- Guardian Analytics (Data Breach) – The Connecticut State AG likely brought State Consumer Protection (SCP) law and State PIP/Breach claims (per Press Release)²¹⁷ against a company that uses behavioral analytics and machine learning to prevent bank fraud. We did not include this in the main report nor in the data above because we could not obtain a legal document to confirm the claims.
- A Feb. 2024 Report²¹⁸ mentioned issuing numerous warning letters regarding lengthy breach notice timelines, as well as “leading or assisting with numerous multistate investigations of large-scale data breaches and other high-profile matters implicating consumer privacy;” issuing 10 cure letters regarding deficient privacy policies; issuing one cure notice to a local grocery store using biometrics to prevent shoplifting; issuing one cure notice to a car brand regarding data collection and sharing; and issuing inquiry letters to a major web service provider planning to use palm recognition, an anonymous peer messaging app directed at teens, and a national cremation services company that may have targeted ads based on information obtained from data brokers.
- An Apr. 2025 Report²¹⁹ noted issuing “dozens” of warning letters related to delayed breach notification and, in some instances, requiring Assurances of Voluntary Compliance (AVCs); issuing over two dozen cure notices over three “privacy notice sweeps;” issuing cure notices to companies that use cookie banners that undermine or override consumers’ ability to make privacy choices; issuing inquiry letters to three companies offering services to minors regarding data protection; issuing cure notices to two telehealth companies regarding inadequate consent mechanisms for processing consumer health data; and “continuing to review” the sensitive data practices of data brokers.

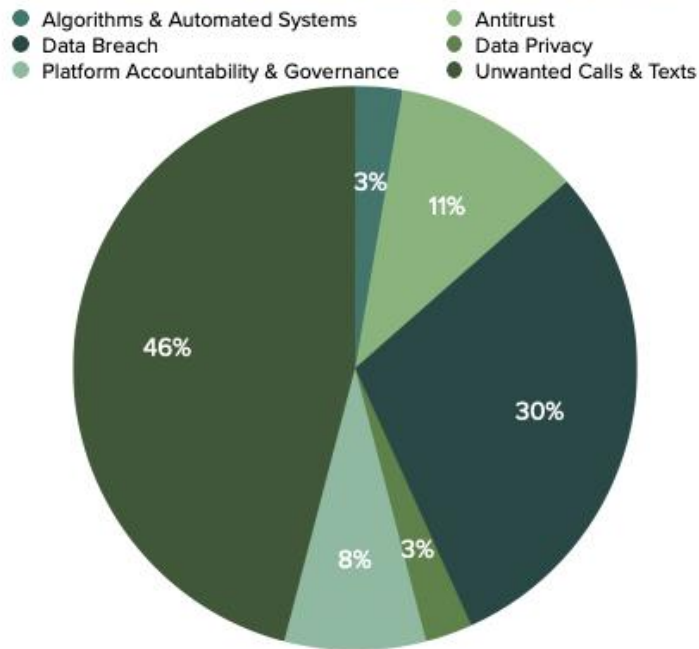
²¹⁷ Press Release, Attorney General Tong Announces \$500,000 Settlement with Guardian Analytics Following Data Breach (Oct. 21, 2024), <https://portal.ct.gov/ag/press-releases/2024-press-releases/attorney-general-tong-announces-settlement-with-guardian-analytics>.

²¹⁸ Report to the General Assembly’s General Law Committee, Pursuant to Public Act 22-15, “An Act Concerning Personal Data Privacy and Online Monitoring” (Feb. 1, 2024), https://portal.ct.gov/-/media/ag/press_releases/2024/ctdpa-final-report.pdf.

²¹⁹ Press Release, Attorney General Tong Releases Updated Report on Connecticut Data Privacy Act (Apr. 17, 2025), <https://portal.ct.gov/ag/press-releases/2025-press-releases/attorney-general-tong-releases-updated-report-on-connecticut-data-privacy-act>.

Delaware

DELAWARE ACTIONS, BY ISSUE CATEGORY



Delaware Enforcement Actions, by Issue Category, by Year

(DE)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1		4
Data Breach	2		6	2	1	11
Data Privacy			1			1
Platform Governance		1		1	1	3
Unwanted Calls		1	1	9	6	17
Grand Total	4	3	8	14	8	37

Delaware Enforcement Actions, by Issue Category, by Fed/Multistate Status

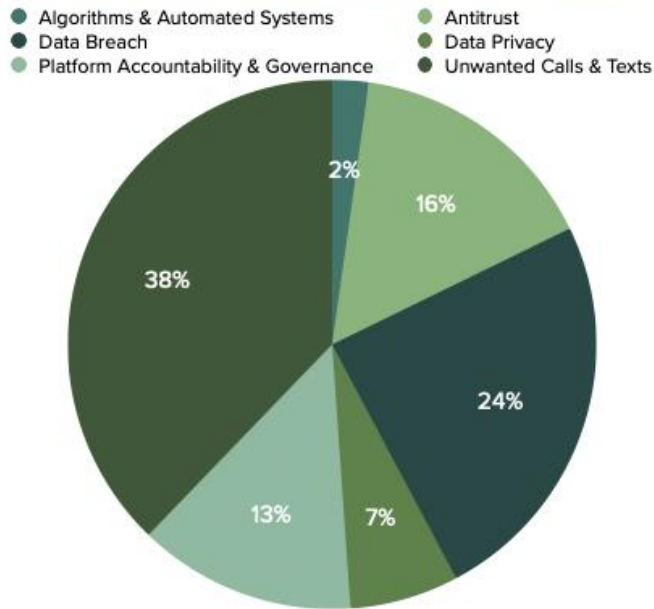
Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	1	3		4
Data Breach		11		11
Data Privacy		1		1
Platform Governance		3		3
Unwanted Calls	1	16		17
Grand Total	2	35		37

Delaware Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		11		11
Case/Settlement		10		10
Investigation		1		1
Data Privacy		1		1
Case/Settlement		1		1
Platform Governance		3		3
Case/Settlement		1		1
Letter		2		2
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	2	35		37

District of Columbia

DISTRICT OF COLUMBIA ACTIONS, BY ISSUE CATEGORY



D.C. Enforcement Actions, by Issue Category, by Year

(DC)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	2		1	2	7
Data Breach	2	1	5	1	2	11
Data Privacy			2	1		3
Platform Governance		1		2	3	6
Unwanted Calls		1	1	9	6	17
Grand Total	4	5	8	15	13	45

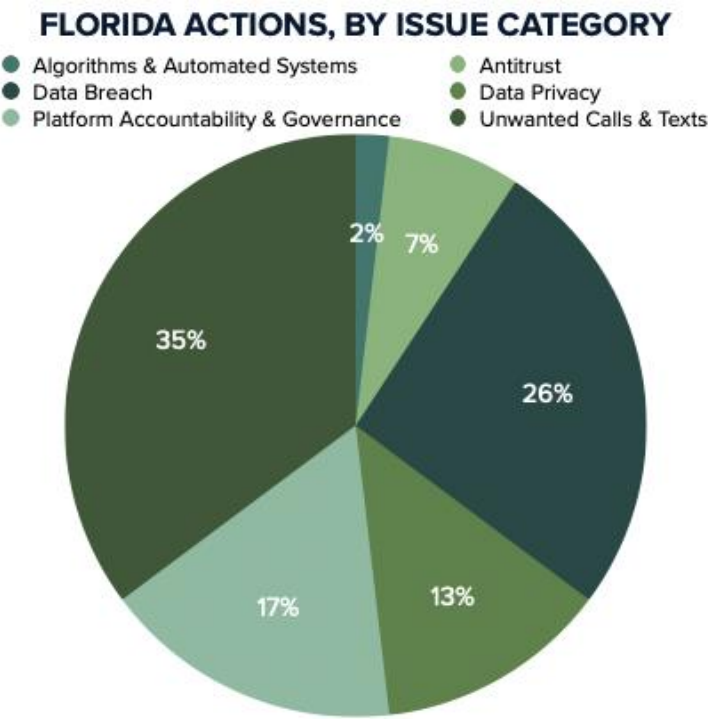
D.C. Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	2	3	2	7
Data Breach		11		11
Data Privacy		2	1	3
Platform Governance		3	3	6
Unwanted Calls	1	16		17
Grand Total	3	36	6	45

D.C. Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	2	3	2	7
Case/Settlement	2	3	2	7
Data Breach		11		11
Case/Settlement		10		10
Letter		1		1
Data Privacy		2	1	3
Case/Settlement		1	1	2
Letter		1		1
Platform Governance		3	3	6
Case/Settlement		1	3	4
Letter		2		2
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	3	36	6	45

Florida



Florida Enforcement Actions, by Issue Category, by Year

(FL)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	3	1				4
Data Breach	4	1	5	3	1	14
Data Privacy			4	2	1	7
Platform Governance	1		2	4	2	9
Unwanted Calls		1	3	9	6	19
Grand Total	8	3	14	19	10	54

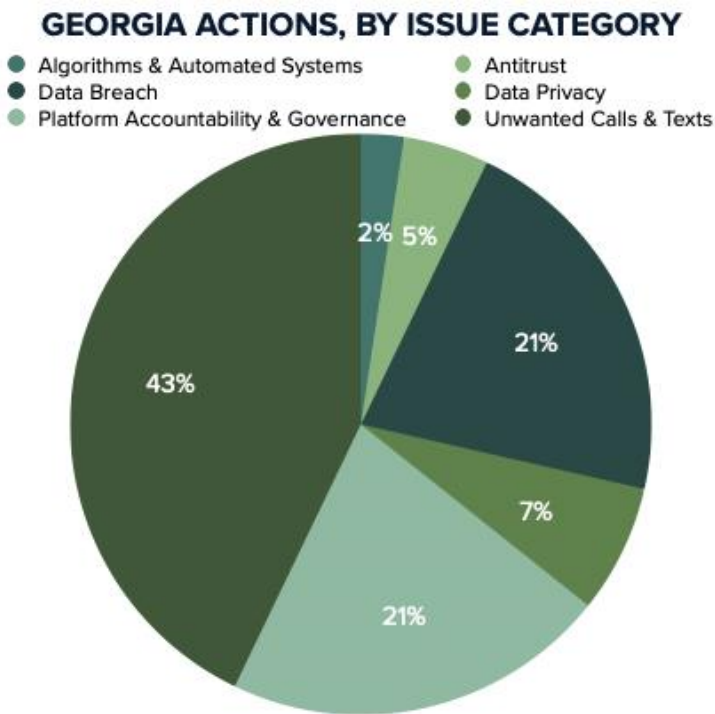
Florida Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	1	3		4
Data Breach		14		14
Data Privacy		5	2	7
Platform Governance		7	2	9
Unwanted Calls	1	16	2	19
Grand Total	2	46	6	54

Florida Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		14		14
Case/Settlement		14		14
Data Privacy		5	2	7
Case/Settlement		1		1
Letter		4	2	6
Platform Governance		7	2	9
Case/Settlement		1	1	2
Investigation			1	1
Letter		6		6
Unwanted Calls	1	16	2	19
Case/Settlement	1	1	2	4
Investigation		1		1
Letter		14		14
Grand Total	2	46	6	54

Georgia



Georgia Enforcement Actions, by Issue Category, by Year

(GA)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	1	1				2
Data Breach	2	1	3	2	1	9
Data Privacy			2		1	3
Platform Governance			3	4	2	9
Unwanted Calls		1	1	9	7	18
Grand Total	3	3	9	16	11	42

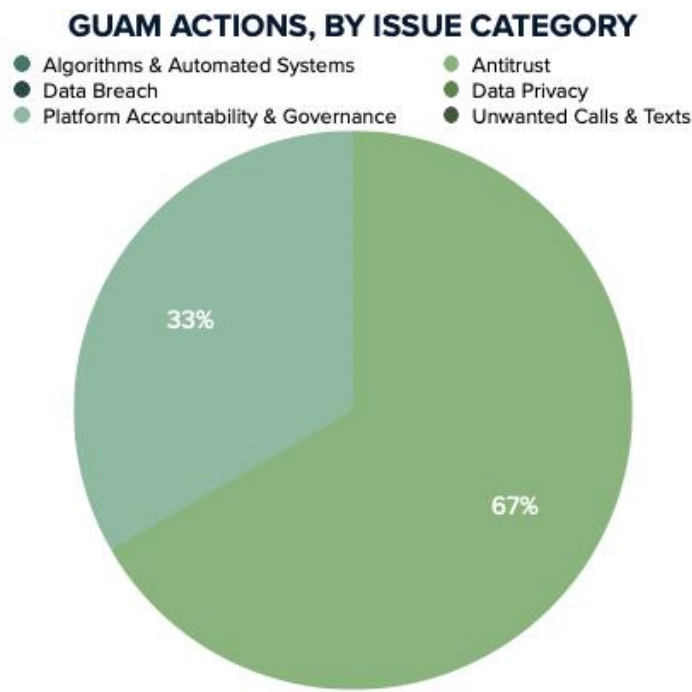
Georgia Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	1	1		2
Data Breach		9		9
Data Privacy		3		3
Platform Governance		9		9
Unwanted Calls	1	16	1	18
Grand Total	2	39	1	42

Georgia Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	1		2
Case/Settlement	1	1		2
Data Breach		9		9
Case/Settlement		9		9
Data Privacy		3		3
Case/Settlement		1		1
Letter		2		2
Platform Governance		9		9
Case/Settlement		2		2
Investigation		1		1
Letter		6		6
Unwanted Calls	1	16	1	18
Case/Settlement	1	1	1	3
Investigation		1		1
Letter		14		14
Grand Total	2	39	1	42

Guam



Guam Enforcement Actions, by Issue Category, by Year

(GU)	2020	2021	2022	2023	2024	Grand Total
Automated Systems						
Antitrust	2					2
Data Breach						
Data Privacy						
Platform Governance		1				1
Unwanted Calls						
Grand Total	2	1				3

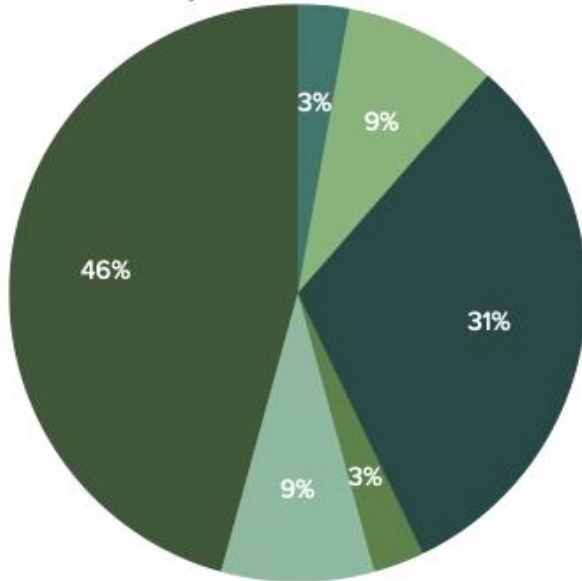
Guam Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems				
Antitrust		2		2
Case/Settlement		2		2
Data Breach				
Data Privacy				
Platform Governance		1		1
Letter		1		1
Unwanted Calls				
Grand Total		3		3

Hawai'i

HAWAI'I ACTIONS, BY ISSUE CATEGORY

- Algorithms & Automated Systems
- Data Breach
- Platform Accountability & Governance
- Antitrust
- Data Privacy
- Unwanted Calls & Texts



Hawai'i Enforcement Actions, by Issue Category, by Year

(HI)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1				3
Data Breach	3	1	4	1	2	11
Data Privacy			1			1
Platform Governance		1		1	1	3
Unwanted Calls			1	9	6	16
Grand Total	5	3	6	12	9	35

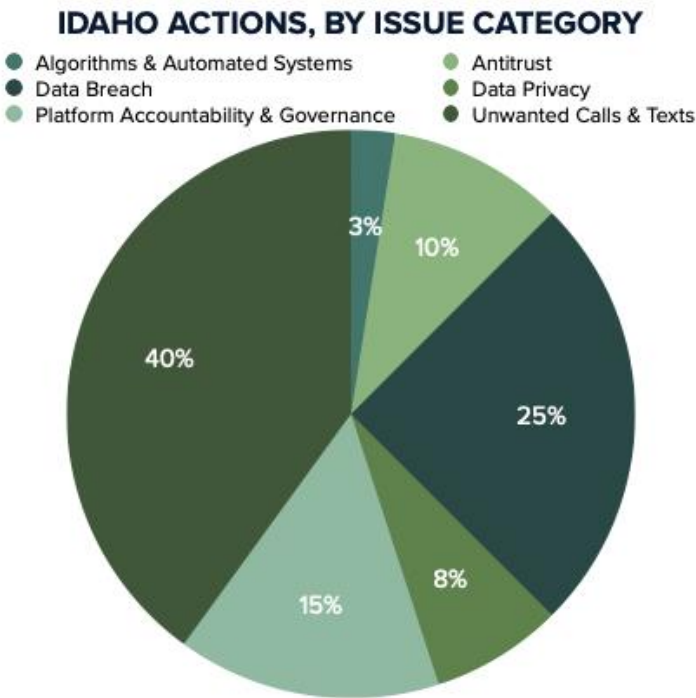
Hawai'i Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust		3		3
Data Breach		11		11
Data Privacy		1		1
Platform Governance		3		3
Unwanted Calls		16		16
Grand Total		35		35

Hawai'i Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust		3		3
Case/Settlement		3		3
Data Breach		11		11
Case/Settlement		10		10
Letter		1		1
Data Privacy		1		1
Case/Settlement		1		1
Platform Governance		3		3
Case/Settlement		1		1
Letter		2		2
Unwanted Calls		16		16
Case/Settlement		1		1
Investigation		1		1
Letter		14		14
Grand Total		35		35

Idaho



Idaho Enforcement Actions, by Issue Category, by Year

(ID)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	3	1				4
Data Breach	2	1	5	1	1	10
Data Privacy		1	1		1	3
Platform Governance		1		4	1	6
Unwanted Calls			1	9	6	16
Grand Total	5	4	7	15	9	40

Idaho Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust		4		4
Data Breach		10		10
Data Privacy		2	1	3
Platform Governance		6		6
Unwanted Calls		16		16
Grand Total		39	1	40

Idaho Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust		4		4
Case/Settlement		4		4
Data Breach		10		10
Case/Settlement		9		9
Investigation		1		1
Data Privacy		2	1	3
Case/Settlement		1	1	2
Letter		1		1
Platform Governance		6		6
Case/Settlement		2		2
Letter		4		4
Unwanted Calls		16		16
Case/Settlement		1		1
Investigation		1		1
Letter		14		14
Grand Total		39	1	40

Illinois



Illinois Enforcement Actions, by Issue Category, by Year

(IL)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1	1	5
Data Breach	4	1	3	1	1	10
Data Privacy			2			2
Platform Governance		1		2	2	5
Unwanted Calls		1	1	9	6	17
Grand Total	6	4	6	14	10	40

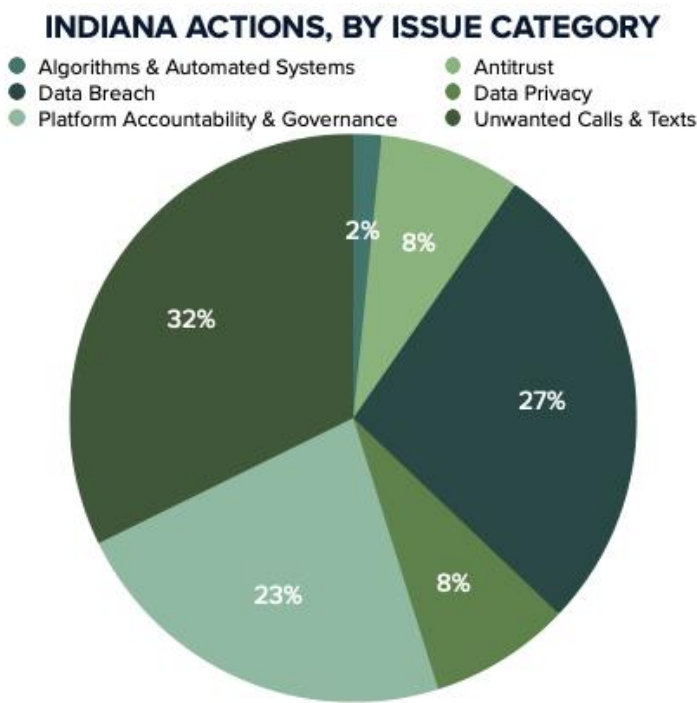
Illinois Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	2	3		5
Data Breach		10		10
Data Privacy		2		2
Platform Governance		4	1	5
Unwanted Calls	1	16		17
Grand Total	3	36	1	40

Illinois Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	2	3		5
Case/Settlement	2	3		5
Data Breach		10		10
Case/Settlement		10		10
Data Privacy		2		2
Case/Settlement		1		1
Letter		1		1
Platform Governance		4	1	5
Case/Settlement		2	1	3
Letter		2		2
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	3	36	1	40

Indiana



Indiana Enforcement Actions, by Issue Category, by Year

(IN)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	3	1			1	5
Data Breach	5	1	5	4	2	17
Data Privacy			4		1	5
Platform Governance		5	4	4	1	14
Unwanted Calls	1	2	1	10	6	20
Grand Total	9	9	14	19	11	62

Indiana Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	2	3		5
Data Breach		14	3	17
Data Privacy		4	1	5
Platform Governance		7	7	14
Unwanted Calls	1	17	2	20
Grand Total	3	46	13	62

Indiana Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

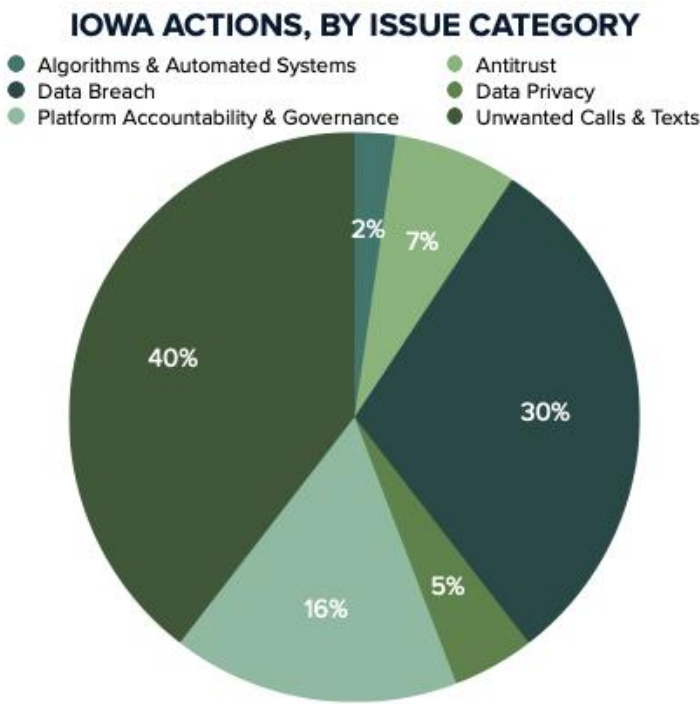
Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	2	3		5
Case/Settlement	2	3		5
Data Breach		14	3	17
Case/Settlement		14	2	16
Investigation			1	1
Data Privacy		4	1	5
Case/Settlement			1	1
Letter		4		4
Platform Governance		7	7	14
Case/Settlement		2	2	4
Investigation			5	5
Letter		5		5
Unwanted Calls	1	17	2	20
Case/Settlement	1	2	2	5
Investigation		1		1
Letter		14		14
Grand Total	3	46	13	62

Additional Indiana Enforcement Actions:

- In April 2023, the Indiana AG settled with Greg Sheppard dba Connected Leads for sending robocalls to individuals on the state Do Not Call list.²²⁰ We did not include this in the main report nor in the data above because we could not obtain a legal document to confirm the claims.

²²⁰ Press Release, *Attorney General Todd Rokita and Team Take Strong Actions Against Robocallers as Part of National Sweep* (Jul. 18, 2023), https://events.in.gov/event/attorney_general_todd_rokita_and_team_take_strong_actions_against_robocallers_as_part_of_national_sweep.

Iowa



Iowa Enforcement Actions, by Issue Category, by Year

(IA)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1				3
Data Breach	4	1	5	2	1	13
Data Privacy			1		1	2
Platform Governance		2		2	3	7
Unwanted Calls		1	1	9	6	17
Grand Total	6	5	7	14	11	43

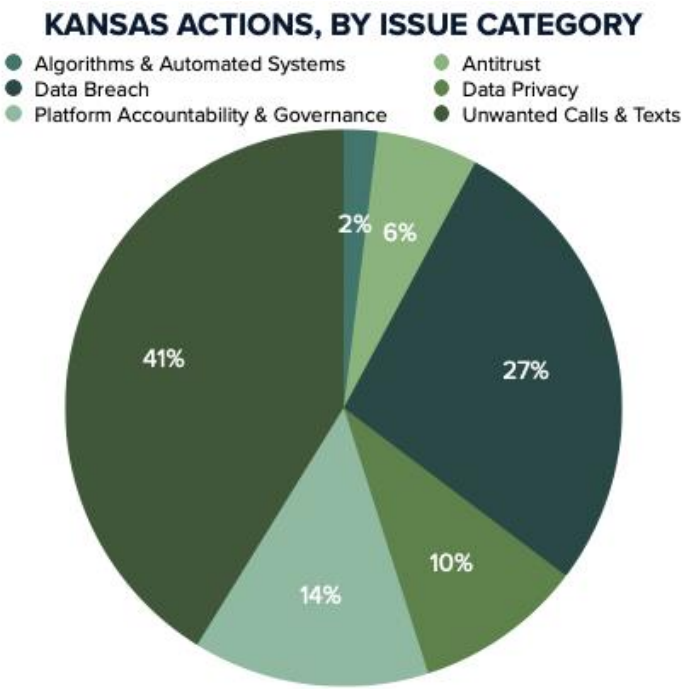
Iowa Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust		3		3
Data Breach		13		13
Data Privacy		2		2
Platform Governance		6	1	7
Unwanted Calls	1	16		17
Grand Total	1	41	1	43

Iowa Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust		3		3
Case/Settlement		3		3
Data Breach		13		13
Case/Settlement		12		12
Investigation		1		1
Data Privacy		2		2
Case/Settlement		1		1
Letter		1		1
Platform Governance		6	1	7
Case/Settlement			1	1
Investigation		1		1
Letter		5		5
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	1	41	1	43

Kansas



Kansas Enforcement Actions, by Issue Category, by Year

(KS)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1				3
Data Breach	5	1	5	2	1	14
Data Privacy			4		1	5
Platform Governance		1		4	2	7
Unwanted Calls	2	3	1	9	6	21
Grand Total	9	6	10	16	10	51

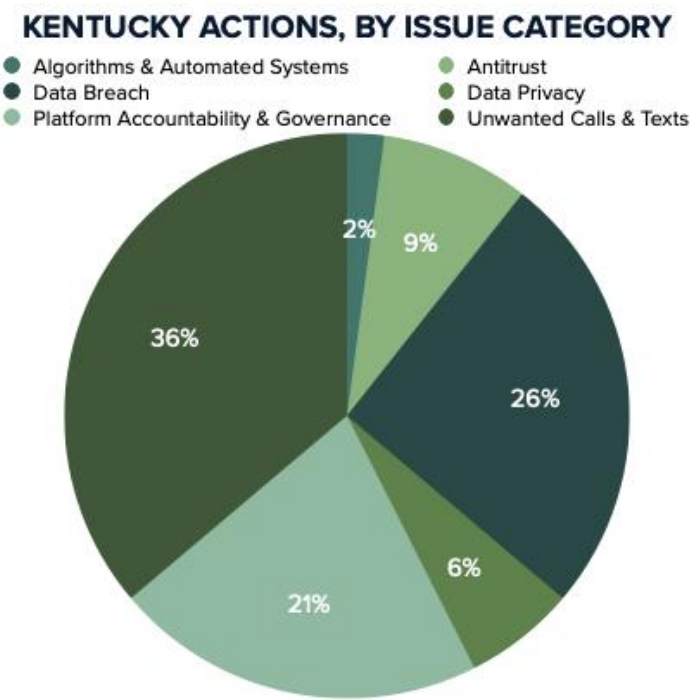
Kansas Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust		3		3
Data Breach		10	4	14
Data Privacy		5		5
Platform Governance		6	1	7
Unwanted Calls	1	16	4	21
Grand Total	1	41	9	51

Kansas Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust		3		3
Case/Settlement		3		3
Data Breach		10	4	14
Case/Settlement		10	4	14
Data Privacy		5		5
Case/Settlement		1		1
Letter		4		4
Platform Governance		6	1	7
Case/Settlement		2	1	3
Letter		4		4
Unwanted Calls	1	16	4	21
Case/Settlement	1	1	4	6
Investigation		1		1
Letter		14		14
Grand Total	1	41	9	51

Kentucky



Kentucky Enforcement Actions, by Issue Category, by Year

(KY)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	3	1				4
Data Breach	4	1	4	2	1	12
Data Privacy			3			3
Platform Governance		1	2	4	3	10
Unwanted Calls		1	1	9	6	17
Grand Total	7	4	10	16	10	47

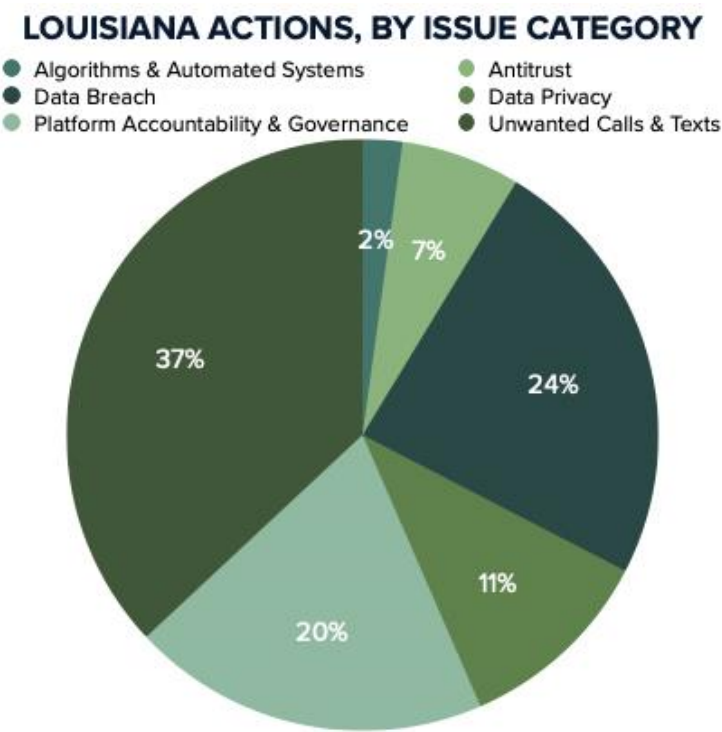
Kentucky Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	1	3		4
Data Breach		12		12
Data Privacy		3		3
Platform Governance		9	1	10
Unwanted Calls	1	16		17
Grand Total	2	44	1	47

Kentucky Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		12		12
Case/Settlement		12		12
Data Privacy		3		3
Case/Settlement		1		1
Letter		2		2
Platform Governance		9	1	10
Case/Settlement		2	1	3
Letter		7		7
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	2	44	1	47

Louisiana



Louisiana Enforcement Actions, by Issue Category, by Year

(LA)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1				3
Data Breach	4	1	3	2	1	11
Data Privacy			4		1	5
Platform Governance		1	2	3	3	9
Unwanted Calls		1	1	9	6	17
Grand Total	6	4	10	15	11	46

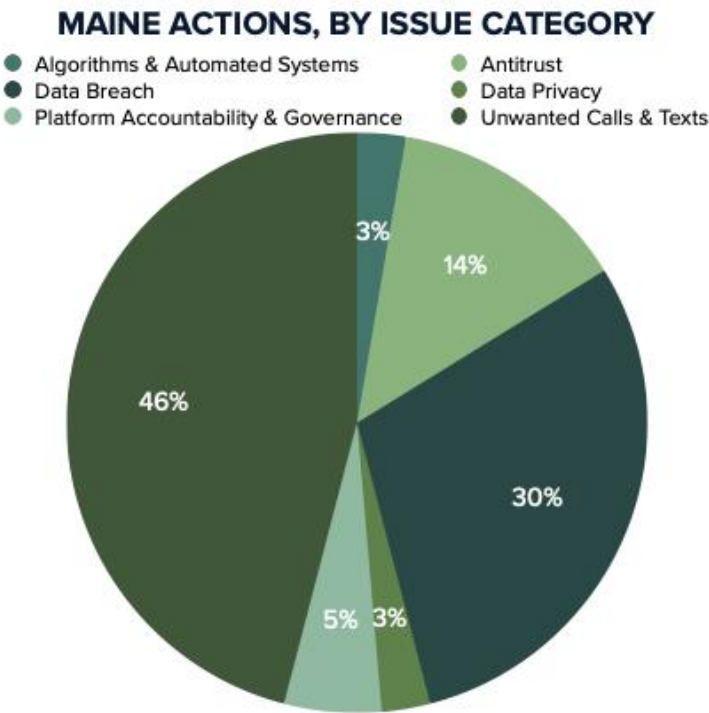
Louisiana Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	1	2		3
Data Breach		11		11
Data Privacy		5		5
Platform Governance		8	1	9
Unwanted Calls	1	16		17
Grand Total	2	43	1	46

Louisiana Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	2		3
Case/Settlement	1	2		3
Data Breach		11		11
Case/Settlement		11		11
Data Privacy		5		5
Case/Settlement		1		1
Letter		4		4
Platform Governance		8	1	9
Case/Settlement		2	1	3
Letter		6		6
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	2	43	1	46

Maine



Maine Enforcement Actions, by Issue Category, by Year

(ME)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1	1	5
Data Breach	2	1	5	1	2	11
Data Privacy			1			1
Platform Governance		1		1		2
Unwanted Calls		1	1	9	6	17
Grand Total	4	4	7	13	9	37

Maine Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	2	3		5
Data Breach		11		11
Data Privacy		1		1
Platform Governance		2		2
Unwanted Calls	1	16		17
Grand Total	3	34		37

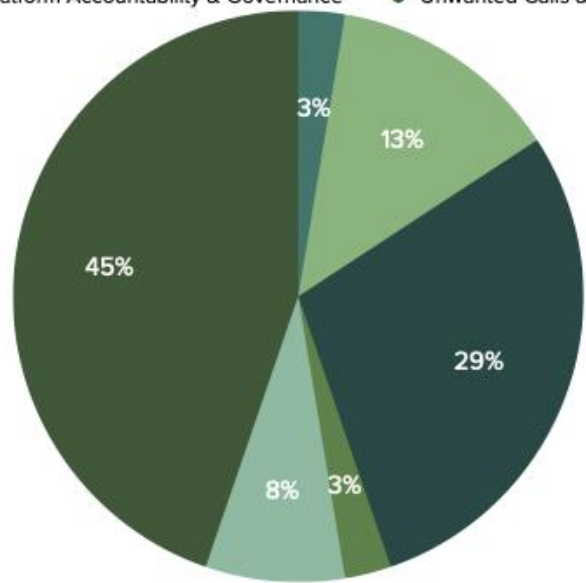
Maine Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	2	3		5
Case/Settlement	2	3		5
Data Breach		11		11
Case/Settlement		9		9
Investigation		1		1
Letter		1		1
Data Privacy		1		1
Case/Settlement		1		1
Platform Governance		2		2
Case/Settlement		1		1
Letter		1		1
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	3	34		37

Maryland

MARYLAND ACTIONS, BY ISSUE CATEGORY

● Algorithms & Automated Systems ● Antitrust
● Data Breach ● Data Privacy
● Platform Accountability & Governance ● Unwanted Calls & Texts



Maryland Enforcement Actions, by Issue Category, by Year

(MD)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1	1	5
Data Breach	2	1	5	2	1	11
Data Privacy			1			1
Platform Governance		1		1	1	3
Unwanted Calls		1	1	9	6	17
Grand Total	4	4	7	14	9	38

Maryland Enforcement Actions, by Issue Category, by Fed/Multistate Status

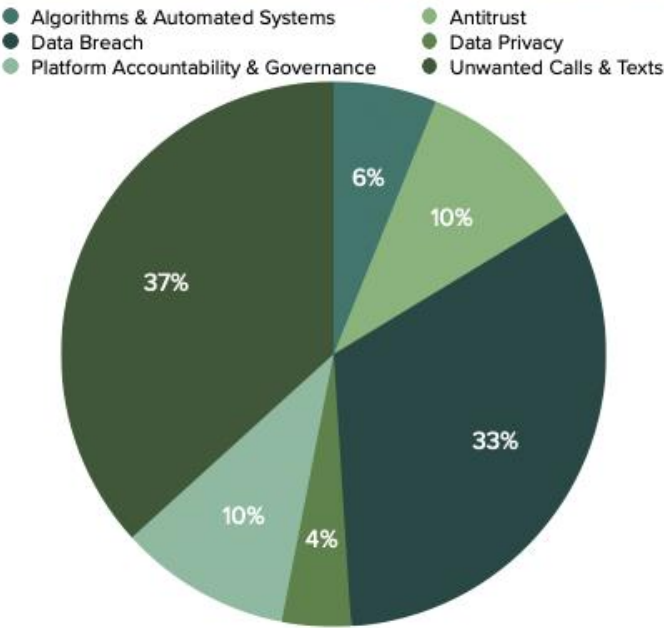
Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	2	3		5
Data Breach		11		11
Data Privacy		1		1
Platform Governance		3		3
Unwanted Calls	1	16		17
Grand Total	3	35		38

Maryland Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	2	3		5
Case/Settlement	2	3		5
Data Breach		11		11
Case/Settlement		11		11
Data Privacy		1		1
Case/Settlement		1		1
Platform Governance		3		3
Case/Settlement		1		1
Letter		2		2
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	3	35		38

Massachusetts

MASSACHUSETTS ACTIONS, BY ISSUE CATEGORY



Massachusetts Enforcement Actions, by Issue Category, by Year

(MA)	2020	2021	2022	2023	2024	Grand Total
Automated Systems			2	1		3
Antitrust	2	1		1	1	5
Data Breach	4	2	6	2	2	16
Data Privacy			2			2
Platform Governance		1		2	2	5
Unwanted Calls	1	1	1	9	6	18
Grand Total	7	5	11	15	11	49

Massachusetts Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	2	3
Antitrust	2	3		5
Data Breach		12	4	16
Data Privacy		2		2
Platform Governance		3	2	5
Unwanted Calls	1	16	1	18
Grand Total	3	37	9	49

Massachusetts Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	2	3
Case/Settlement		1	2	3
Antitrust	2	3		5
Case/Settlement	2	3		5
Data Breach		12	4	16
Case/Settlement		11	3	14
Investigation			1	1
Letter		1		1
Data Privacy		2		2
Case/Settlement		1		1
Letter		1		1
Platform Governance		3	2	5
Case/Settlement		1	2	3
Letter		2		2
Unwanted Calls	1	16	1	18
Case/Settlement	1	1	1	3
Investigation		1		1
Letter		14		14
Grand Total	3	37	9	49

Additional Massachusetts Enforcement Actions:

- In 2020, the Massachusetts State AG brought two cases related to exceeding a statutory limit on calls within a given time period. One was against a private college²²¹ and one was against a mortgage company.²²² We did not include these in our report because we opted to take a narrower view of what comprised the Unwanted Calls & Texts Issue Category (only Do Not Call and prerecorded message violations).
- In March 2021, the Massachusetts State AG settled a November 2019 complaint against Vtech Software Solution, Inc.²²³ We did not include this action in our report because it seemed based on fraud rather than on privacy harms, but we include it here for sake of completeness.
- In December 2023, the Massachusetts State AG sued ArbiterSports, LLC, for a data breach caused by compromised credentials used to install malware via remote desktop, in violation of State Consumer Protection law and State PIP/Breach law.²²⁴ Exposed data included Social Security Numbers. The case was resolved by consent judgment in January 2024.²²⁵ We were excited to discover this case and wanted to include it in our report, but could not update all of our data visualizations with this information and still publish on time. To that point, we re-iterate that we encourage State AGs to reach out and share any enforcement actions they think this report failed to include, as we intend for the report to serve as an accurate historical record. For instance, we intend to follow up with updated data that includes this Data Breach action.

²²¹ Press Release, *Bay State College to Pay \$1.1 Million in Relief for Misleading Hundreds of Former Students* (Jan. 2, 2020), <https://www.mass.gov/news/bay-state-college-to-pay-11-million-in-relief-for-misleading-hundreds-of-former-students>.

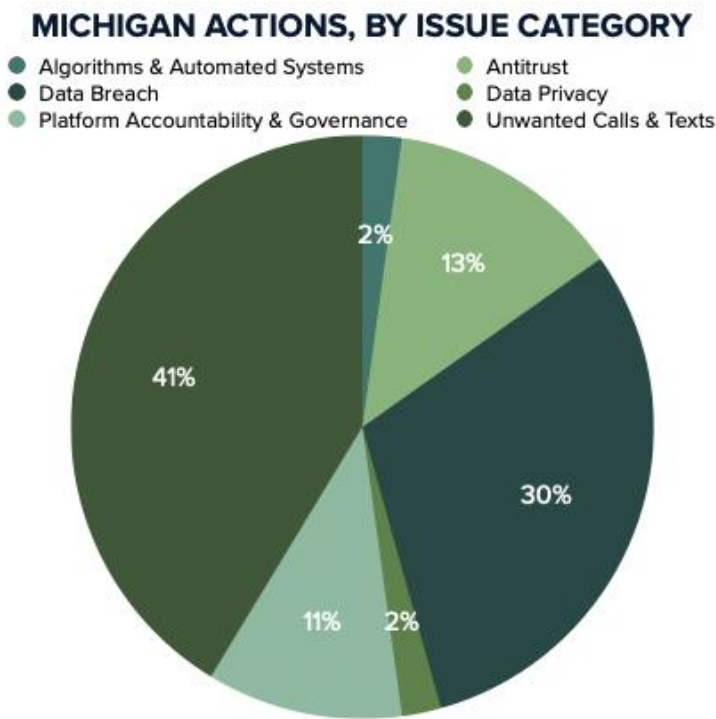
²²² Press Release, *AG Healey Secures \$565,000 from Mortgage Company for Harassing Homeowners with Excessive Phone Calls* (Jun. 22, 2020), <https://www.mass.gov/news/ag-healey-secures-565000-from-mortgage-company-for-harassing-homeowners-with-excessive-phone-calls>.

²²³ Compl, *Commonwealth of Massachusetts v. Vtech Software Solution, Inc. et al.*, Case No. 1984-cv-3703F (Suffolk Cnty. Super. Ct. Nov. 25, 2019).

²²⁴ Compl, *Commonwealth of Massachusetts v. ArbiterSports, LLC*, Case No. 2384-cv-2956 (Suffolk Cnty. Super. Ct. Dec. 29, 2023).

²²⁵ Final Judgment by Consent, *Commonwealth of Massachusetts v. ArbiterSports*, Case No. 2384-cv-2956 (Suffolk Cnty. Super. Ct. Jan. 10, 2024).

Michigan



Michigan Enforcement Actions, by Issue Category, by Year

(MI)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		2	1	6
Data Breach	5	1	4	2	2	14
Data Privacy			1			1
Platform Governance		1	1	2	1	5
Unwanted Calls	3	1	2	7	6	19
Grand Total	10	4	8	14	10	46

Michigan Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	4	2		6
Data Breach		14		14
Data Privacy		1		1
Platform Governance		5		5
Unwanted Calls	1	15	3	19
Grand Total	5	38	3	46

Michigan Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	4	2		6
Case/Settlement	4	2		6
Data Breach		14		14
Case/Settlement		13		13
Letter		1		1
Data Privacy		1		1
Case/Settlement		1		1
Platform Governance		5		5
Case/Settlement		2		2
Investigation		1		1
Letter		2		2
Unwanted Calls	1	15	3	19
Case/Settlement	1	2	2	5
Investigation		1	1	2
Letter		12		12
Grand Total	5	38	3	46

Additional Michigan Enforcement Actions:

- Michigan was part of the Anti-Robocall Task Force, and letters were sent by the Task Force on behalf of the Michigan AG to ThinQ²²⁶ and All Access Telecom.²²⁷ However, because the Michigan State AG independently took related action against each of these companies and we counted those as Michigan enforcement actions,²²⁸ we did not count these Task Force letters separately for Michigan in our datasets.
- In December 2024, the Michigan State AG announced that the Michigan Court of Appeals upheld criminal charges for the individuals behind an illegal voter suppression call campaign.²²⁹ We did not include this in our report because it was individual criminal charges, although we did include the New York State AG's related allegations against the platform used to transmit the illegal call campaign.

²²⁶ Letter to Aaron Leon, CEO thinQ Technologies, Inc., from Tracy Nayer, Special Deputy Attorney General, North Carolina Dep't of Justice (Nov. 3, 2023), <https://ncdoj.gov/wp-content/uploads/2023/11/State-AG-Task-Force-NOTICE-Letter-to-THINQ.pdf>.

²²⁷ Letter to Lamar Carter, CEO All Access Telecom, Inc., from Tracy Nayer, Special Deputy Attorney General, North Carolina Dep't of Justice (Nov. 3, 2023), <https://ncdoj.gov/wp-content/uploads/2023/11/State-AG-Task-Force-NOTICE-Letter-to-ALL-ACCESS.pdf>.

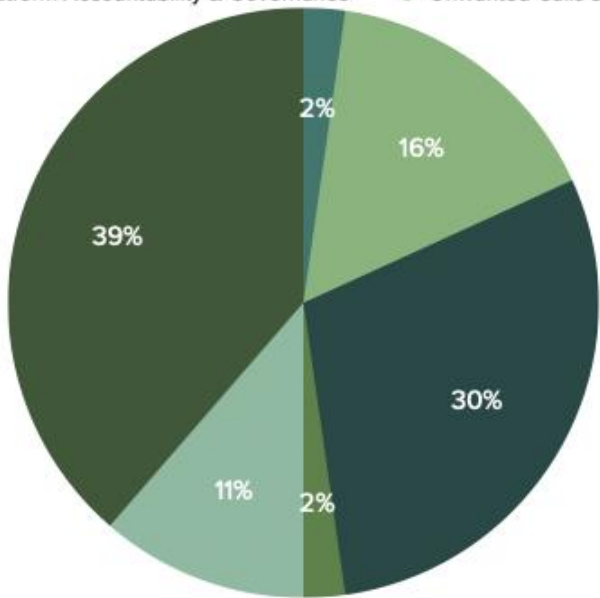
²²⁸ Press Release, AG Nessel Takes Action Regarding 'AT&T DirecTV' Scam Calls (Feb. 17, 2022), <https://www.michigan.gov/ag/news/press-releases/2022/02/17/ag-nessel-takes-action-regarding-att-directv-scam-calls>; Press Release, AG Nessel Announces Significant Settlement with Telecom Carrier Focused on Innovative Robocall Mitigation Measures (Sept. 11, 2020), <https://www.michigan.gov/ag/news/press-releases/2020/09/11/ag-nessel-announces-significant-settlement-with-telecom-carrier>.

²²⁹ Press Release, Court of Appeals Upholds Attorney General's Criminal Charges in Voter Intimidation Robocalls Case (Dec. 16, 2024), <https://www.michigan.gov/ag/news/press-releases/2024/12/16/court-of-appeals-upholds-attorney-generals-criminal-charges-in-voter-intimidation-robocall-case>.

Minnesota

MINNESOTA ACTIONS, BY ISSUE CATEGORY

● Algorithms & Automated Systems ● Antitrust
● Data Breach ● Data Privacy
● Platform Accountability & Governance ● Unwanted Calls & Texts



Minnesota Enforcement Actions, by Issue Category, by Year

(MN)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		2	2	7
Data Breach	3	1	5	2	2	13
Data Privacy			1			1
Platform Governance		1	1	2	1	5
Unwanted Calls	1		1	9	6	17
Grand Total	6	3	8	16	11	44

Minnesota Enforcement Actions, by Issue Category, by Fed/Multistate Status

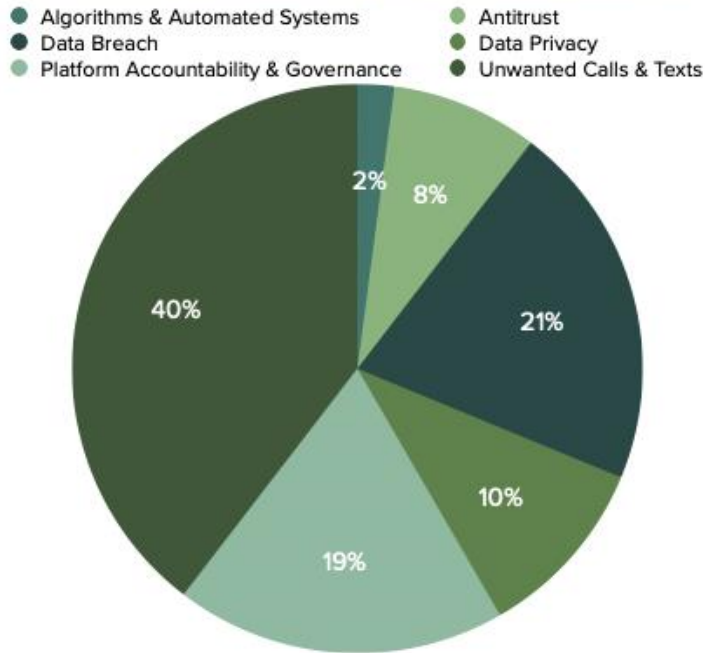
Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	4	3		7
Data Breach		13		13
Data Privacy		1		1
Platform Governance		5		5
Unwanted Calls	1	16		17
Grand Total	5	39		44

Minnesota Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	4	3		7
Case/Settlement	4	3		7
Data Breach		13		13
Case/Settlement		11		11
Investigation		1		1
Letter		1		1
Data Privacy		1		1
Case/Settlement		1		1
Platform Governance		5		5
Case/Settlement		2		2
Investigation		1		1
Letter		2		2
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	5	39		44

Mississippi

MISSISSIPPI ACTIONS, BY ISSUE CATEGORY



Mississippi Enforcement Actions, by Issue Category, by Year

(MS)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	3	1				4
Data Breach	3		3	2	2	10
Data Privacy			4		1	5
Platform Governance		1	2	4	2	9
Unwanted Calls		1	1	11	6	19
Grand Total	6	3	10	18	11	48

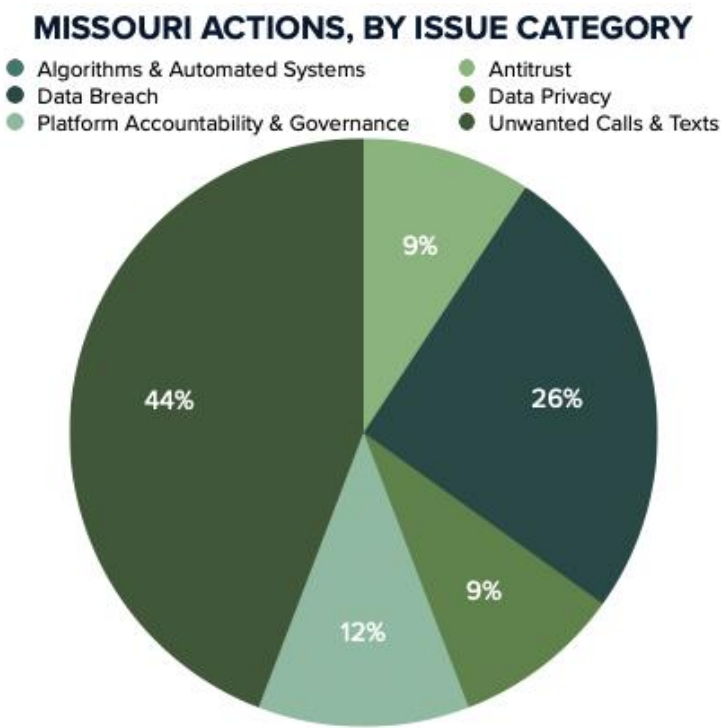
Mississippi Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	1	3		4
Data Breach		10		10
Data Privacy		5		5
Platform Governance		7	2	9
Unwanted Calls	1	16	2	19
Grand Total	2	42	4	48

Mississippi Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		10		10
Case/Settlement		8		8
Investigation		1		1
Letter		1		1
Data Privacy		5		5
Case/Settlement		1		1
Letter		4		4
Platform Governance		7	2	9
Case/Settlement		1	2	3
Letter		6		6
Unwanted Calls	1	16	2	19
Case/Settlement	1	1	2	4
Investigation		1		1
Letter		14		14
Grand Total	2	42	4	48

Missouri



Missouri Enforcement Actions, by Issue Category, by Year

(MO)	2020	2021	2022	2023	2024	Grand Total
Automated Systems						
Antitrust	3	1				4
Data Breach	4	1	3	1	2	11
Data Privacy			2	1	1	4
Platform Governance		1		3	1	5
Unwanted Calls	1	1	1	9	7	19
Grand Total	8	4	6	14	11	43

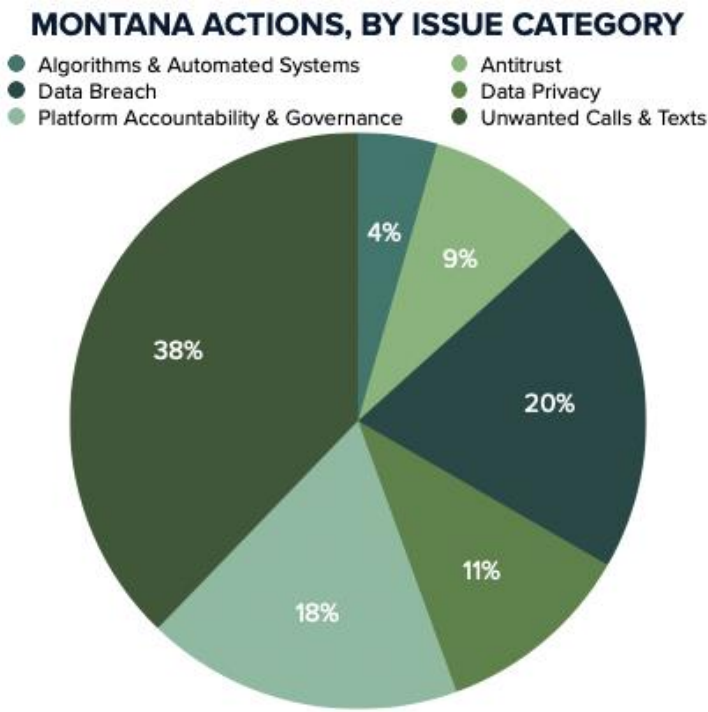
Missouri Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems				
Antitrust	1	3		4
Data Breach		10	1	11
Data Privacy		3	1	4
Platform Governance		5		5
Unwanted Calls	1	17	1	19
Grand Total	2	38	3	43

Missouri Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems				
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		10	1	11
Case/Settlement		10		10
Investigation			1	1
Data Privacy		3	1	4
Case/Settlement		1	1	2
Letter		2		2
Platform Governance		5		5
Case/Settlement		1		1
Letter		4		4
Unwanted Calls	1	17	1	19
Case/Settlement	1	2	1	4
Investigation		1		1
Letter		14		14
Grand Total	2	38	3	43

Montana



Montana Enforcement Actions, by Issue Category, by Year

(MT)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1	1	2
Antitrust	3	1				4
Data Breach	2		4	2	1	9
Data Privacy			3	1	1	5
Platform Governance		1	2	3	2	8
Unwanted Calls		1	1	9	6	17
Grand Total	5	3	10	16	11	45

Montana Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	1	2
Antitrust	1	3		4
Data Breach		9		9
Data Privacy		5		5
Platform Governance		6	2	8
Unwanted Calls	1	16		17
Grand Total	2	40	3	45

Montana Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

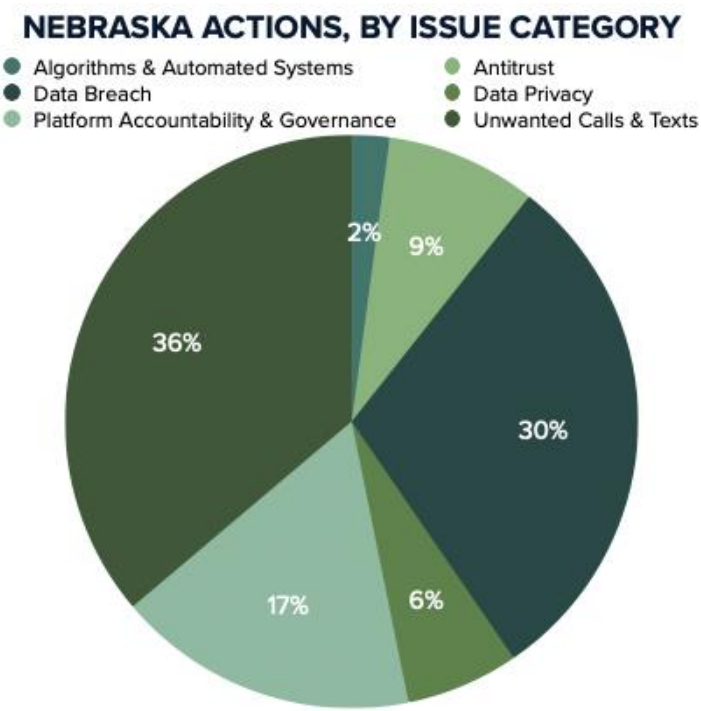
Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	1	2
Case/Settlement		1		1
Letter			1	1
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		9		9
Case/Settlement		9		9
Data Privacy		5		5
Case/Settlement		1		1
Letter		4		4
Platform Governance		6	2	8
Case/Settlement			2	2
Letter		6		6
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	2	40	3	45

Additional Montana Enforcement Actions:

- In 2022, the Montana Attorney General announced restitution checks for moneys relinquished by an individual who assisted an alleged tech support scheme that resulted in installing malicious software on consumers' devices.²³⁰ We did not include this in our report dataset because, although the consent judgment included shuttering the company that the individual used to wire the money to foreign scammers, it seemed that the foreign scammers installed the malware, not the individual's company, meaning the allegations against the individual's company amounted to purely pecuniary, fraud-based harms.

²³⁰ Press Release, *DOJ Office of Consumer Protection recovers \$96,000 for victims of tech support scheme* (Sept. 30, 2022), <https://dojmt.gov/doj-office-of-consumer-protection-recovers-96000-for-victims-of-tech-support-scheme/>.

Nebraska



Nebraska Enforcement Actions, by Issue Category, by Year

(NE)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1		4
Data Breach	4	1	5	2	2	14
Data Privacy			2		1	3
Platform Governance		1		4	3	8
Unwanted Calls		1	1	9	6	17
Grand Total	6	4	8	17	12	47

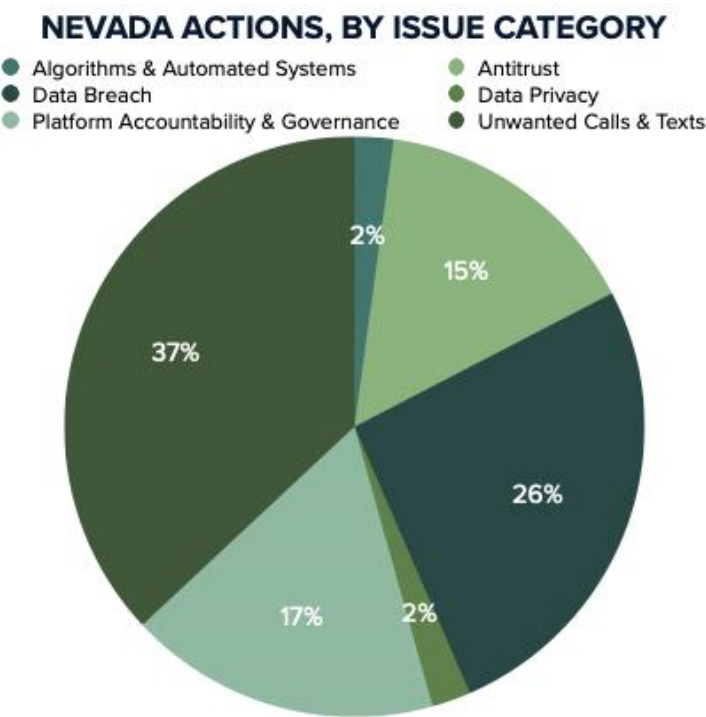
Nebraska Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	1	3		4
Data Breach		13	1	14
Data Privacy		3		3
Platform Governance		7	1	8
Unwanted Calls	1	16		17
Grand Total	2	43	2	47

Nebraska Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		13	1	14
Case/Settlement		12	1	13
Investigation		1		1
Data Privacy		3		3
Case/Settlement		1		1
Letter		2		2
Platform Governance		7	1	8
Case/Settlement		2	1	3
Letter		5		5
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	2	43	2	47

Nevada



Nevada Enforcement Actions, by Issue Category, by Year

(NV)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	3	1		1	2	7
Data Breach	4	1	4	1	2	12
Data Privacy			1			1
Platform Governance		1		1	6	8
Unwanted Calls		1	1	9	6	17
Grand Total	7	4	6	13	16	46

Nevada Enforcement Actions, by Issue Category, by Fed/Multistate Status

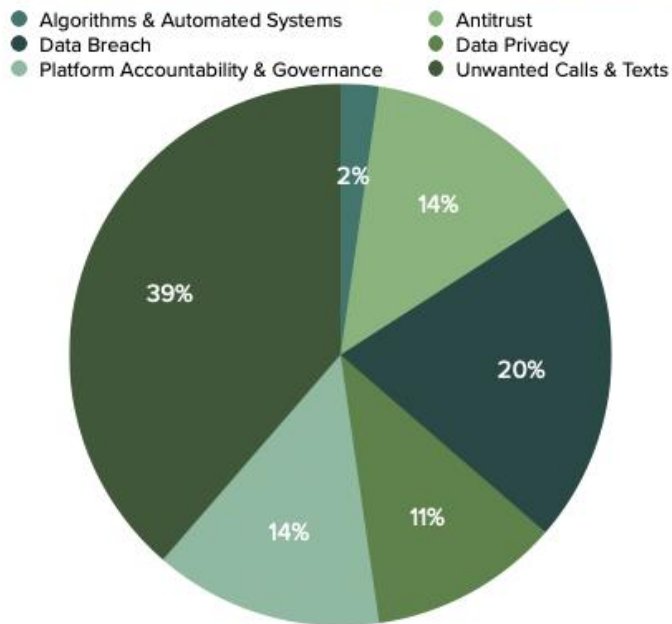
Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	3	4		7
Data Breach		12		12
Data Privacy		1		1
Platform Governance		3	5	8
Unwanted Calls	1	16		17
Grand Total	4	37	5	46

Nevada Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	3	4		7
Case/Settlement	3	4		7
Data Breach		12		12
Case/Settlement		11		11
Letter		1		1
Data Privacy		1		1
Case/Settlement		1		1
Platform Governance		3	5	8
Case/Settlement		1	5	6
Letter		2		2
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	4	37	5	46

New Hampshire

NEW HAMPSHIRE ACTIONS, BY ISSUE CATEGORY



New Hampshire Enforcement Actions, by Issue Category, by Year

(NH)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		2	1	6
Data Breach	1	1	3	2	2	9
Data Privacy			3	1	1	5
Platform Governance		1		2	3	6
Unwanted Calls		1	1	8	7	17
Grand Total	3	4	7	16	14	44

New Hampshire Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	3	3		6
Data Breach		9		9
Data Privacy		5		5
Platform Governance		4	2	6
Unwanted Calls	2	15		17
Grand Total	5	37	2	44

New Hampshire Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	3	3		6
Case/Settlement	3	3		6
Data Breach		9		9
Case/Settlement		8		8
Letter		1		1
Data Privacy		5		5
Case/Settlement		1		1
Letter		4		4
Platform Governance		4	2	6
Case/Settlement			2	2
Letter		4		4
Unwanted Calls	2	15		17
Case/Settlement	1	1		2
Investigation	1	1		2
Letter		13		13
Grand Total	5	37	2	44

Additional New Hampshire Enforcement Actions:

- New Hampshire was part of the Anti-Robocall Task Force, and letters were sent by the Task Force on behalf of the New Hampshire AG to Lingo²³¹ and to Life Corp.²³² However, because the New Hampshire State AG took related action against Lingo and Life Corp which we counted as New Hampshire State AG enforcement actions, we did not count the Task Force letters separately for New Hampshire in our datasets.²³³

²³¹ Letter to Alex Valencia, Chief Compliance Officer, Lingo Telecom, LLC, from Tracy Nayer, Special Deputy Attorney General, North Carolina Dep't of Justice (Nov. 3, 2023), <https://ncdoj.gov/wp-content/uploads/2023/11/State-AG-Task-Force-NOTICE-Letter-to-LINGO.pdf>.

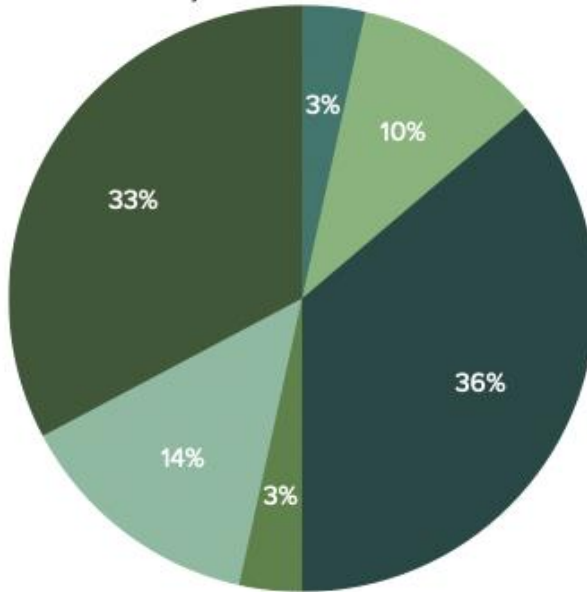
²³² Letter to Walter Monk, Founding Owner Life Corp., from Tracy Nayer, Special Deputy Attorney General, North Carolina Dep't of Justice (Feb. 6, 2024), <https://ncdoj.gov/wp-content/uploads/2024/02/State-AG-Task-Force-NOTICE-Letter-to-LIFE-CORP-Feb.-2024-1.pdf>.

²³³ Press Release, *Voter Suppression AI Robocalls Investigation Update* (Feb. 6, 2024), <https://www.doj.nh.gov/news-and-media/voter-suppression-ai-robocall-investigation-update>.

New Jersey

NEW JERSEY ACTIONS, BY ISSUE CATEGORY

- Algorithms & Automated Systems
- Data Breach
- Platform Accountability & Governance
- Antitrust
- Data Privacy
- Unwanted Calls & Texts



New Jersey Enforcement Actions, by Issue Category, by Year

(NJ)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1	1	2
Antitrust	2	1		2	1	6
Data Breach	6	4	6	3	2	21
Data Privacy			2			2
Platform Governance		1	2	2	3	8
Unwanted Calls	1	1	1	10	6	19
Grand Total	9	7	11	18	13	58

New Jersey Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	1	2
Antitrust	3	3		6
Data Breach		16	5	21
Data Privacy		2		2
Platform Governance		4	4	8
Unwanted Calls	2	16	1	19
Grand Total	5	42	11	58

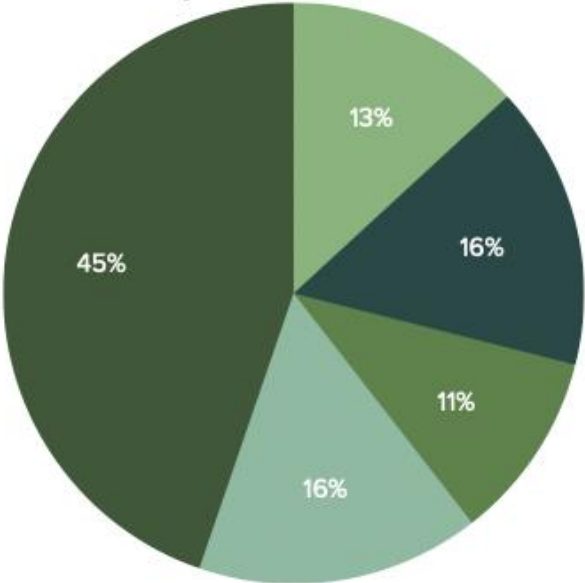
New Jersey Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	1	2
Case/Settlement		1		1
Investigation			1	1
Antitrust	3	3		6
Case/Settlement	3	3		6
Data Breach		16	5	21
Case/Settlement		16	5	21
Data Privacy		2		2
Case/Settlement		1		1
Letter		1		1
Platform Governance		4	4	8
Case/Settlement		2	2	4
Investigation			2	2
Letter		2		2
Unwanted Calls	2	16	1	19
Case/Settlement	2	1	1	4
Investigation		1		1
Letter		14		14
Grand Total	5	42	11	58

New Mexico

NEW MEXICO ACTIONS, BY ISSUE CATEGORY

- Algorithms & Automated Systems
- Data Breach
- Platform Accountability & Governance
- Antitrust
- Data Privacy
- Unwanted Calls & Texts



New Mexico Enforcement Actions, by Issue Category, by Year

(NM)	2020	2021	2022	2023	2024	Grand Total
Automated Systems						
Antitrust	2	1		1	1	5
Data Breach	1	1	2	1	1	6
Data Privacy	1	2	1			4
Platform Governance		1	1	2	2	6
Unwanted Calls		1	1	9	6	17
Grand Total	4	6	5	13	10	38

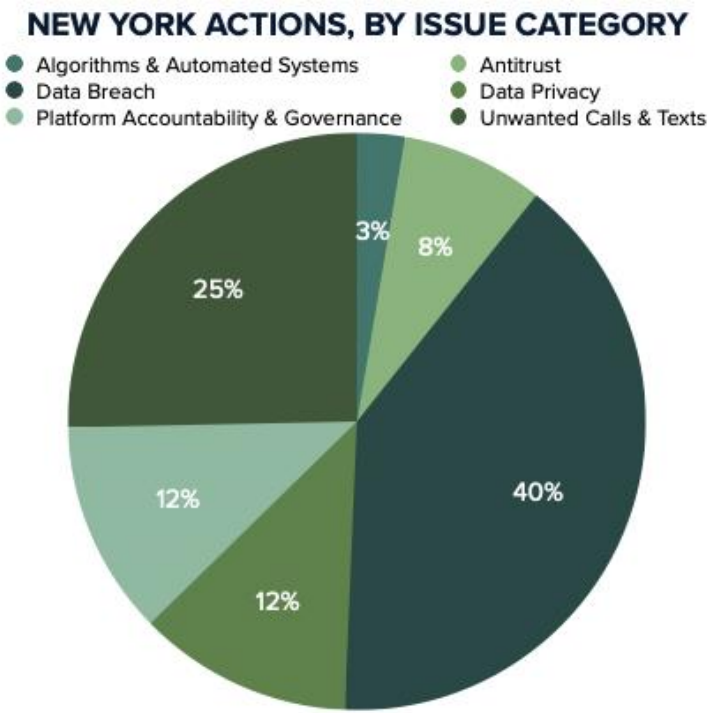
New Mexico Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems				
Antitrust	2	3		5
Data Breach		6		6
Data Privacy		1	3	4
Platform Governance		4	2	6
Unwanted Calls	1	16		17
Grand Total	3	30	5	38

New Mexico Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems				
Antitrust	2	3		5
Case/Settlement	2	3		5
Data Breach		6		6
Case/Settlement		6		6
Data Privacy		1	3	4
Case/Settlement		1	3	4
Platform Governance		4	2	6
Case/Settlement		1	2	3
Investigation		1		1
Letter		2		2
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	3	30	5	38

New York



New York Enforcement Actions, by Issue Category, by Year

(NY)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				2		2
Antitrust	2	1		2	1	6
Data Breach	4	2	7	7	10	30
Data Privacy		3	1	3	2	9
Platform Governance	1	1	4	1	2	9
Unwanted Calls	1	1	1	10	6	19
Grand Total	8	8	13	25	21	75

New York Enforcement Actions, by Issue Category, by Fed/Multistate Status

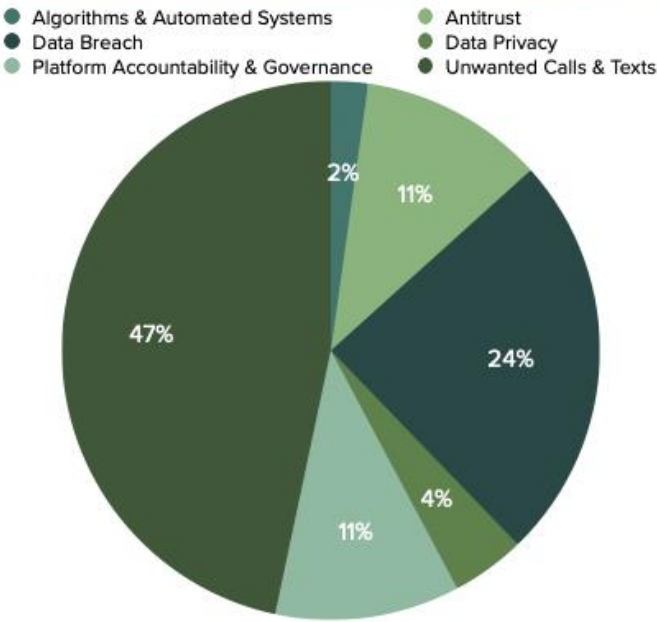
Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	1	2
Antitrust	3	3		6
Data Breach		14	16	30
Data Privacy		1	8	9
Platform Governance		3	6	9
Unwanted Calls	2	16	1	19
Grand Total	5	38	32	75

New York Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	1	2
Case/Settlement		1		1
Letter			1	1
Antitrust	3	3		6
Case/Settlement	3	3		6
Data Breach		14	16	30
Case/Settlement		13	16	29
Letter		1		1
Data Privacy		1	8	9
Case/Settlement		1	8	9
Platform Governance		3	6	9
Case/Settlement		1	1	2
Investigation			5	5
Letter		2		2
Unwanted Calls	2	16	1	19
Case/Settlement	2	1	1	4
Investigation		1		1
Letter		14		14
Grand Total	5	38	32	75

North Carolina

NORTH CAROLINA ACTIONS, BY ISSUE CATEGORY



North Carolina Enforcement Actions, by Issue Category, by Year

(NC)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1	1	5
Data Breach	4	1	2	2	2	11
Data Privacy			2			2
Platform Governance		1		2	2	5
Unwanted Calls	1	1	2	10	7	21
Grand Total	7	4	6	16	12	45

North Carolina Enforcement Actions, by Issue Category, by Fed/Multistate Status

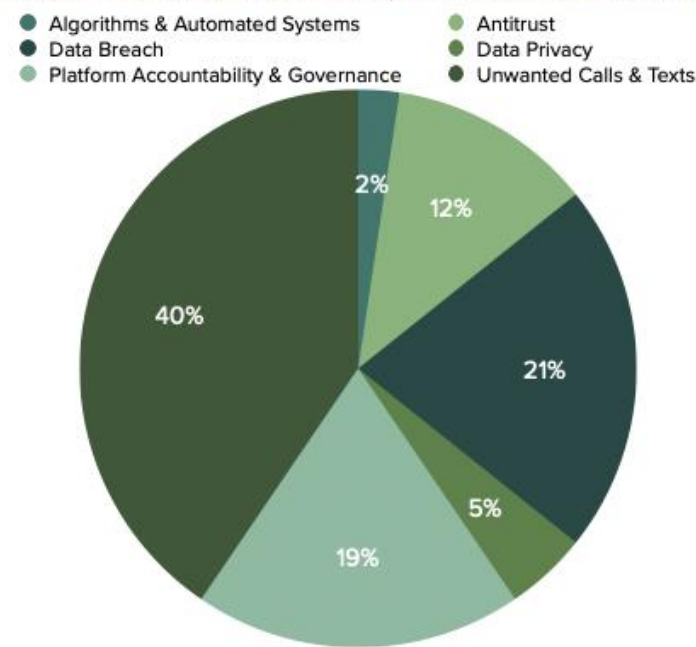
Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	2	3		5
Data Breach		11		11
Data Privacy		2		2
Platform Governance		4	1	5
Unwanted Calls	1	17	3	21
Grand Total	3	38	4	45

North Carolina Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	2	3		5
Case/Settlement	2	3		5
Data Breach		11		11
Case/Settlement		10		10
Letter		1		1
Data Privacy		2		2
Case/Settlement		1		1
Letter		1		1
Platform Governance		4	1	5
Case/Settlement		2	1	3
Letter		2		2
Unwanted Calls	1	17	3	21
Case/Settlement	1	2	3	6
Investigation		1		1
Letter		14		14
Grand Total	3	38	4	45

North Dakota

NORTH DAKOTA ACTIONS, BY ISSUE CATEGORY



North Dakota Enforcement Actions, by Issue Category, by Year

(ND)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	3	1			1	5
Data Breach	3		4	1	1	9
Data Privacy			1		1	2
Platform Governance		1	2	4	1	8
Unwanted Calls	1		1	9	6	17
Grand Total	7	2	8	15	10	42

North Dakota Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	1	4		5
Data Breach		9		9
Data Privacy		2		2
Platform Governance		8		8
Unwanted Calls		17		17
Grand Total	1	41		42

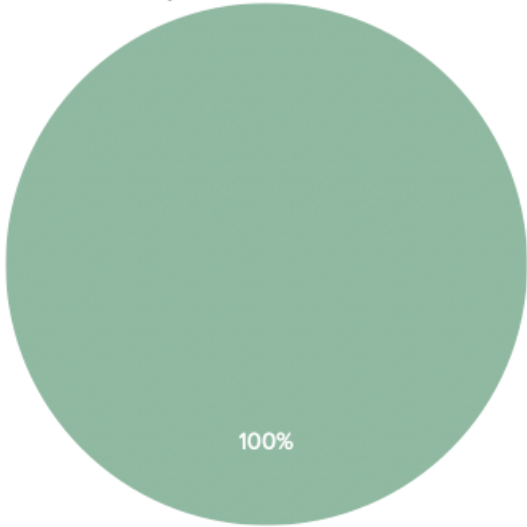
North Dakota Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	4		5
Case/Settlement	1	4		5
Data Breach		9		9
Case/Settlement		9		9
Data Privacy		2		2
Case/Settlement		1		1
Letter		1		1
Platform Governance		8		8
Case/Settlement		2		2
Letter		6		6
Unwanted Calls		17		17
Case/Settlement		2		2
Investigation		1		1
Letter		14		14
Grand Total	1	41		42

Northern Mariana Islands

N. MARIANA ISLANDS ACTIONS, BY ISSUE CATEGORY

- Algorithms & Automated Systems
- Antitrust
- Data Breach
- Data Privacy
- Platform Accountability & Governance
- Unwanted Calls & Texts



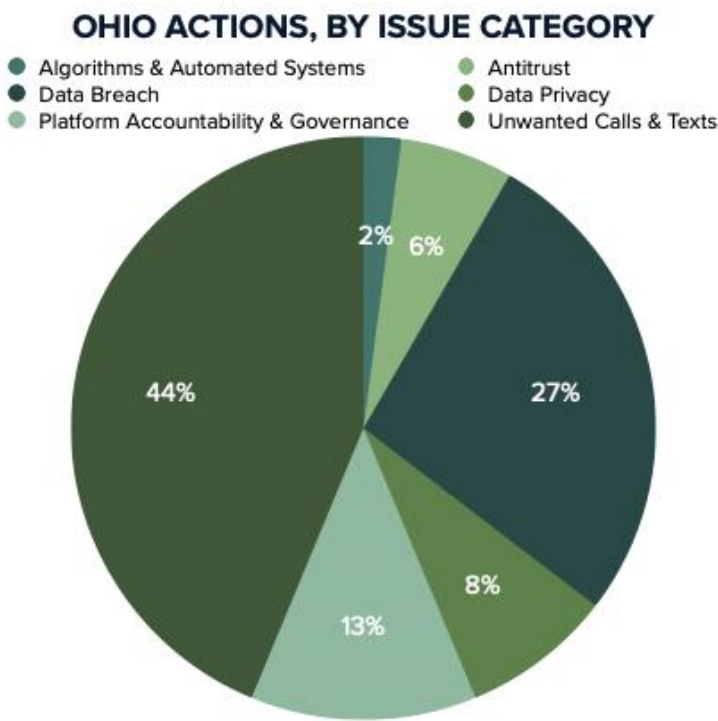
Northern Mariana Islands Enforcement Actions, by Issue Category, by Year

(MP)	2020	2021	2022	2023	2024	Grand Total
Automated Systems						
Antitrust						
Data Breach						
Data Privacy						
Platform Governance		1				1
Unwanted Calls						
Grand Total		1				1

Northern Mariana Islands Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems				
Antitrust				
Data Breach				
Data Privacy				
Platform Governance		1		1
Letter		1		1
Unwanted Calls				
Grand Total		1		1

Ohio



Ohio Enforcement Actions, by Issue Category, by Year

(OH)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1				3
Data Breach	4	1	4	3	1	13
Data Privacy			4			4
Platform Governance		1		3	2	6
Unwanted Calls	2	1	2	10	6	21
Grand Total	8	4	10	17	9	48

Ohio Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed.	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems			1		1
Antitrust			3		3
Data Breach			13		13
Data Privacy			4		4
Platform Governance			6		6
Unwanted Calls	1	1	17	2	21
Grand Total	1	1	44	2	48

Ohio Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed.	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems			1		1
Case/Settlement			1		1
Antitrust			3		3
Case/Settlement			3		3
Data Breach			13		13
Case/Settlement			13		13
Data Privacy			4		4
Case/Settlement			1		1
Letter			3		3
Platform Governance			6		6
Case/Settlement			2		2
Letter			4		4
Unwanted Calls	1	1	17	2	21
Case/Settlement	1	1	2	2	6
Investigation			1		1
Letter			14		14
Grand Total	1	1	44	2	48

Additional Ohio Enforcement Actions:

- In June 2021, Ohio State AG filed a lawsuit asking the court to declare that Google is a “common carrier,” such that the government could then regulate it differently to ensure fair access and non-discrimination. While the lawsuit did not seek monetary damages, it alleged that declaring Google to be a common carrier would increase competition and benefit consumers. We did not include this in the body of the report because it was not enforcement *against* Google directly, but nonetheless it is included here to note a creative effort and use of State AG resources to strengthen consumer protection and competition.²³⁴
- In June 2022, the Ohio State AG issued redacted warning letters to ten Voice over Internet Protocol (VoIP) providers supporting illegal call campaigns, including violations of the TCPA, the TSR, state telemarketing laws including O.R.C. § 109.87 and § 4719.01, and the Ohio Consumer Sales Practices Act.²³⁵ In its press release, the Ohio State AG noted that the letters served to put the providers on notice of their illegal actions.²³⁶
- In June 2020, the Ohio State AG announced a settlement resolving allegations that the defendant company served as a third party payment processor for telemarketing scams.²³⁷ Related to its Unwanted Calls & Texts case with the FTC against Educare and Globex, the Ohio State AG (again in conjunction with the FTC) also sued Madera Merchant Services LLC for processing clearly fraudulent charges from telemarketing schemes. We did not include this in our report because it was a purely pecuniary harm, however we applaud the Ohio State AG for alleging liability for a company which could have detected and prevented the consumer harm, but which profited from failing to do so.²³⁸

²³⁴ Press Release, AG Yost Files Landmark Lawsuit to Declare Google a Public Utility (Jun. 8, 2021), <https://www.ohioattorneygeneral.gov/Media/News-Releases/June-2021/AG-Yost-Files-Landmark-Lawsuit-to-Declare-Google-a>.

²³⁵ See, e.g., Press Release, RE: Assisting/Facilitating Robocalls into Ohio, (Jun. 23, 2022), <https://www.ohioattorneygeneral.gov/Files/Briefing-Room/News-Releases/Consumer-Protection/2022-06-23-Combined-Warning-Letters-to-Voice-Servi.aspx>.

²³⁶ Press Release, AG Yost Issues Warning to Companies Facilitating Potentially Illegal Robocalls (Jun. 28, 2022), <https://www.ohioattorneygeneral.gov/Media/News-Releases/June-2022/AG-Yost-Issues-Warning-to-Companies-Facilitating-P>.

²³⁷ Press Release, Yost Announces Ban on Payment Processing for Texas Business With Ties to Scammers (Jun. 10, 2020), <https://www.ohioattorneygeneral.gov/Media/News-Releases/June-2020/Yost-Announces-Ban-on-Payment-Processing-for-Texas>.

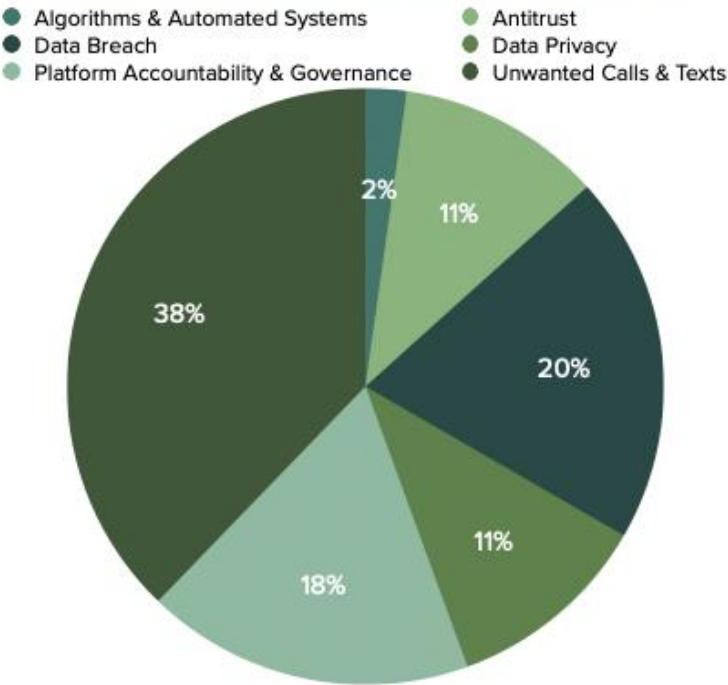
²³⁸ Compl, *FTC v. Madera Merch. Services, LLC, et al.*, Case No. 3:19-CV-195 (W.D.Tx. July 19, 2019), https://www.ftc.gov/system/files/documents/cases/madera_complaint_for_permanent_injunction_and_other_equitable_relief.pdf.

- In addition to its illegal auto warranty calls case against Sumco et al., the Ohio State AG also sued Pelican Investments, a related enterprise.²³⁹ We did not include this in our report because the allegations did not include Do Not Call or prerecorded message violations.

²³⁹ Compl, *Ohio v. Pelican Inv. Holdings, LLC, et al.*, Case No. 23-CV-47 (Franklin Cnty. Ct of Common Pleas Jan. 4, 2023), <https://www.ohioattorneygeneral.gov/Files/Briefing-Room/News-Releases/Consumer-Protection/2023-1-5-Pelican-Dimension-Complaint-file-stamped.aspx>.

Oklahoma

OKLAHOMA ACTIONS, BY ISSUE CATEGORY



Oklahoma Enforcement Actions, by Issue Category, by Year

(OK)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1	1	5
Data Breach	2	1	3	2	1	9
Data Privacy			4		1	5
Platform Governance		1	2	3	2	8
Unwanted Calls		1	1	9	6	17
Grand Total	4	4	10	16	11	45

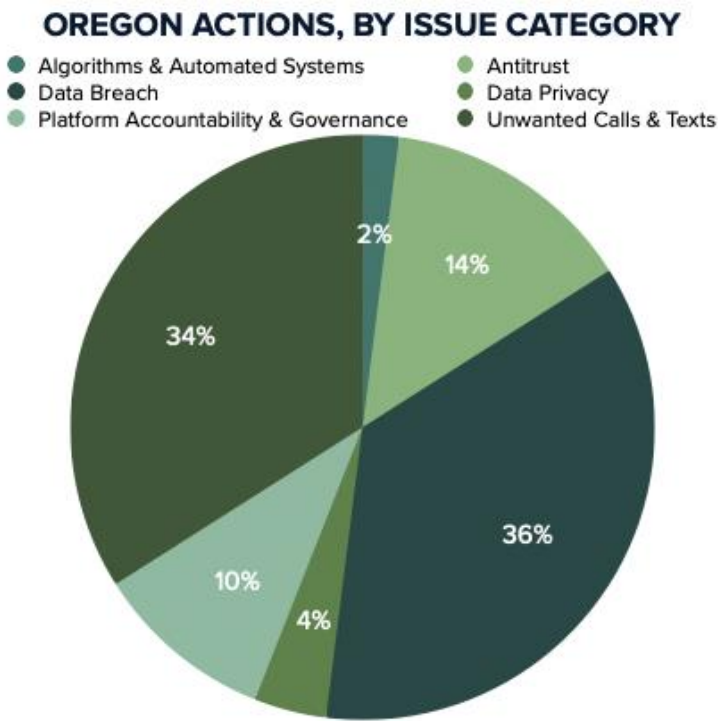
Oklahoma Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	2	3		5
Data Breach		9		9
Data Privacy		5		5
Platform Governance		7	1	8
Unwanted Calls	1	16		17
Grand Total	3	41	1	45

Oklahoma Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	2	3		5
Case/Settlement	2	3		5
Data Breach		9		9
Case/Settlement		9		9
Data Privacy		5		5
Case/Settlement		1		1
Letter		4		4
Platform Governance		7	1	8
Case/Settlement		1	1	2
Letter		6		6
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	3	41	1	45

Oregon



Oregon Enforcement Actions, by Issue Category, by Year

(OR)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1	3	7
Data Breach	5	2	5	3	3	18
Data Privacy			2			2
Platform Governance		1		2	2	5
Unwanted Calls		1	1	9	6	17
Grand Total	7	5	8	16	14	50

Oregon Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	4	3		7
Data Breach		16	2	18
Data Privacy		2		2
Platform Governance		4	1	5
Unwanted Calls	1	16		17
Grand Total	5	42	3	50

Oregon Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	4	3		7
Case/Settlement	4	3		7
Data Breach		16	2	18
Case/Settlement		15	2	17
Letter		1		1
Data Privacy		2		2
Case/Settlement		1		1
Letter		1		1
Platform Governance		4	1	5
Case/Settlement		2	1	3
Letter		2		2
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	5	42	3	50

Additional Oregon Enforcement Actions:

- The Oregon State Attorney General has issued several enforcement reports providing updates of its activities related to the recently active Oregon Consumer Privacy Act (OCPA). We include them in Appendix 5 rather than in our report dataset because the precise timing and targets of the enforcement actions are not public information. In its August 2025 Enforcement Report on the OCPA,²⁴⁰ the Oregon Attorney General noted that its Privacy Unit initiated and closed 38 cure letter matters, and that additional matters based on complaints remain ongoing and open. In its April 2025 Enforcement Report on the Oregon Consumer Privacy Act,²⁴¹ the Oregon State AG noted that it “continued to send cure letters whose publicly available privacy notices were not compliant with the OCPA, as well as inquiry letters to companies, requesting more information about their privacy practices.” The report noted that the Privacy Unit closed eleven cure letter matters (including inquiry letters). In its March 2025 Enforcement Report on the Oregon Consumer Privacy Act (2024),²⁴² the Oregon State AG noted that it issued over a dozen cure notices and inquiry letters. It also noted that it sent “light” cure letters to all data brokers who had not addressed the OCPA in their public-facing privacy notices (at least twenty). It noted that the Privacy Unit initiated and closed 21 cure letter matters.

²⁴⁰ *Enforcement Report: The Oregon Consumer Privacy Act (2024), The First Year 2-3* (Aug. 2025), <https://www.doj.state.or.us/wp-content/uploads/2025/08/OCPA-One-Year-Enforcement-Report-2025.pdf>.

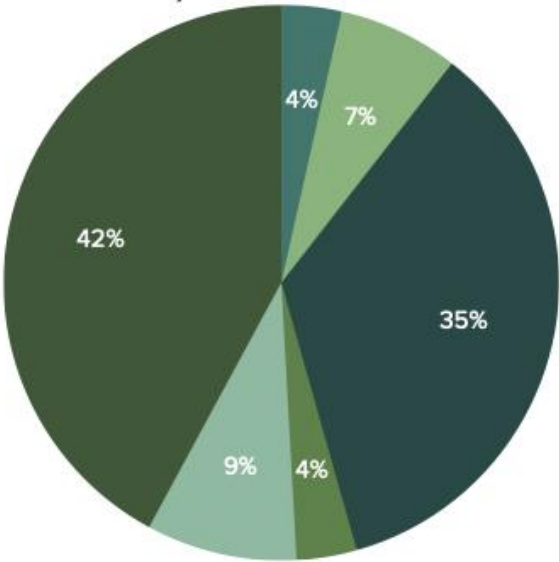
²⁴¹ *Quarterly Enforcement Report: The Oregon Consumer Privacy Act (2024), January-March 2025* 3 (Apr. 2025), <https://www.doj.state.or.us/wp-content/uploads/2025/03/OCPA-Q1-Report.pdf>.

²⁴² *Enforcement Report: The Oregon Consumer Privacy Act (2024), The First Sixth Month* at 1, 8 (Mar. 2025), <https://www.doj.state.or.us/wp-content/uploads/2025/03/OCPA-Six-Month-Enforcement-Report.pdf>.

Pennsylvania

PENNSYLVANIA ACTIONS, BY ISSUE CATEGORY

- Algorithms & Automated Systems
- Data Breach
- Platform Accountability & Governance
- Antitrust
- Data Privacy
- Unwanted Calls & Texts



Pennsylvania Enforcement Actions, by Issue Category, by Year

(PA)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1	1	2
Antitrust	2	1		1		4
Data Breach	5	1	7	5	2	20
Data Privacy			1		1	2
Platform Governance		1	1	2	1	5
Unwanted Calls		1	3	13	7	24
Grand Total	7	4	12	22	12	57

Pennsylvania Enforcement Actions, by Issue Category, by Fed/Multistate Status

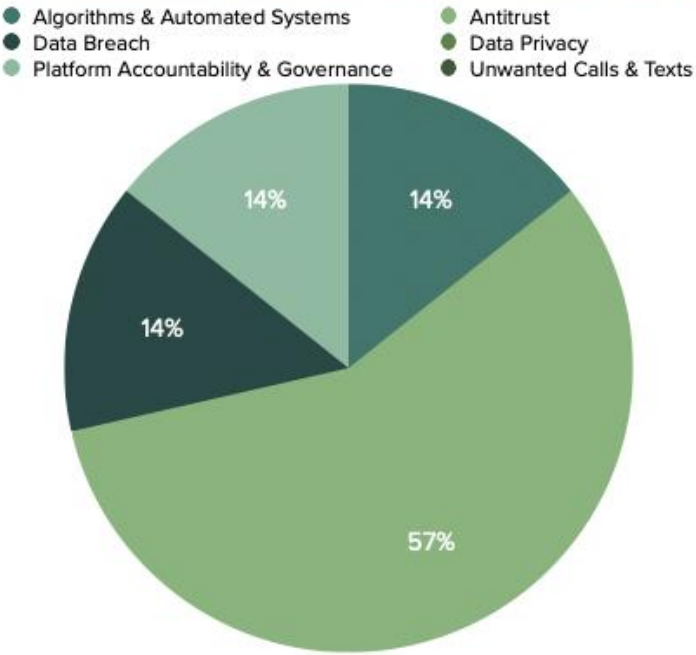
Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	1	2
Antitrust	1	3		4
Data Breach		17	3	20
Data Privacy		1	1	2
Platform Governance		5		5
Unwanted Calls	1	16	7	24
Grand Total	2	43	12	57

Pennsylvania Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	1	2
Case/Settlement		1	1	2
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		17	3	20
Case/Settlement		16	3	19
Letter		1		1
Data Privacy		1	1	2
Case/Settlement		1	1	2
Platform Governance		5		5
Case/Settlement		2		2
Investigation		1		1
Letter		2		2
Unwanted Calls	1	16	7	24
Case/Settlement	1	1	7	9
Investigation		1		1
Letter		14		14
Grand Total	2	43	12	57

Puerto Rico

PUERTO RICO ACTIONS, BY ISSUE CATEGORY



Puerto Rico Enforcement Actions, by Issue Category, by Year

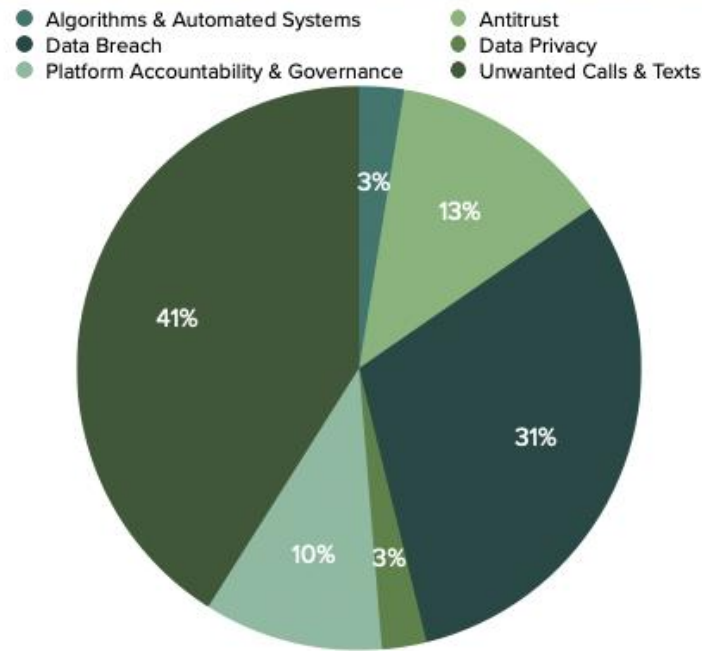
(PR)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1		4
Data Breach				1		1
Data Privacy						
Platform Governance		1				1
Unwanted Calls						
Grand Total	2	2		3		7

Puerto Rico Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		1		1
Case/Settlement		1		1
Data Privacy				
Platform Governance		1		1
Letter		1		1
Unwanted Calls				
Grand Total	1	6		7

Rhode Island

RHODE ISLAND ACTIONS, BY ISSUE CATEGORY



Rhode Island Enforcement Actions, by Issue Category, by Year

(RI)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		2		5
Data Breach	3	1	4	2	2	12
Data Privacy				1		1
Platform Governance		1		2	1	4
Unwanted Calls			1	9	6	16
Grand Total	5	3	5	17	9	39

Rhode Island Enforcement Actions, by Issue Category, by Fed/Multistate Status

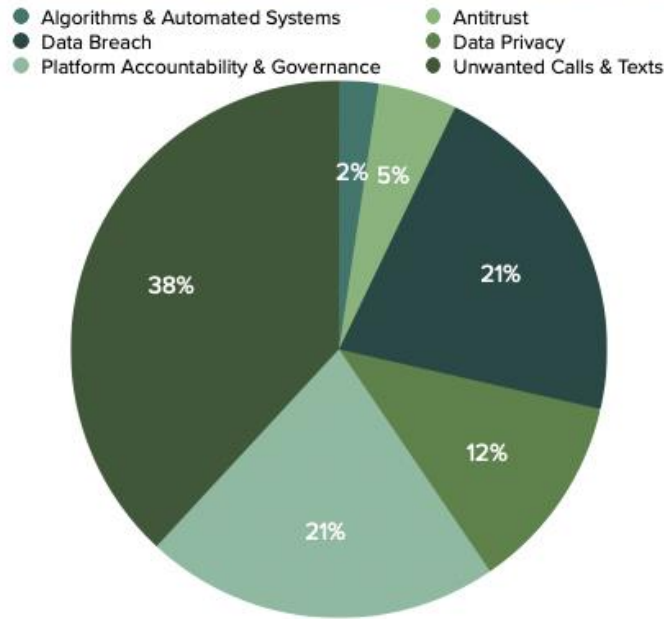
Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	2	3		5
Data Breach		12		12
Data Privacy		1		1
Platform Governance		4		4
Unwanted Calls		16		16
Grand Total	2	37		39

Rhode Island Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	2	3		5
Case/Settlement	2	3		5
Data Breach		12		12
Case/Settlement		11		11
Letter		1		1
Data Privacy		1		1
Case/Settlement		1		1
Platform Governance		4		4
Case/Settlement		2		2
Letter		2		2
Unwanted Calls		16		16
Case/Settlement		1		1
Investigation		1		1
Letter		14		14
Grand Total	2	37		39

South Carolina

SOUTH CAROLINA ACTIONS, BY ISSUE CATEGORY



South Carolina Enforcement Actions, by Issue Category, by Year

(SC)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	1	1				2
Data Breach	3	1	2	2	1	9
Data Privacy			4		1	5
Platform Governance		1	2	3	3	9
Unwanted Calls			1	9	6	16
Grand Total	4	3	9	15	11	42

South Carolina Enforcement Actions, by Issue Category, by Fed/Multistate Status

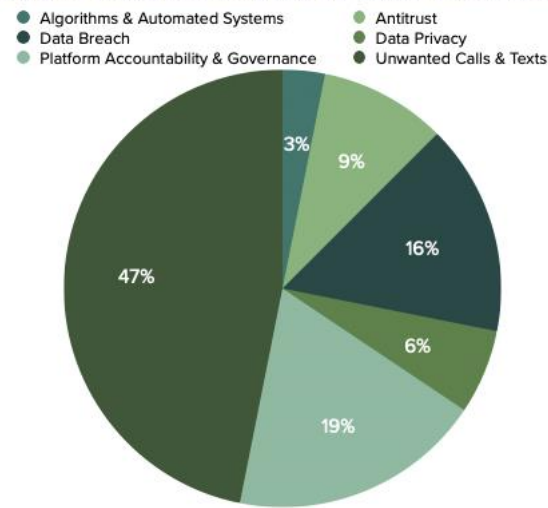
Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	1	1		2
Data Breach		9		9
Data Privacy		5		5
Platform Governance		8	1	9
Unwanted Calls		16		16
Grand Total	1	40	1	42

South Carolina Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	1		2
Case/Settlement	1	1		2
Data Breach		9		9
Case/Settlement		9		9
Data Privacy		5		5
Case/Settlement		1		1
Letter		4		4
Platform Governance		8	1	9
Case/Settlement		1	1	2
Letter		7		7
Unwanted Calls		16		16
Case/Settlement		1		1
Investigation		1		1
Letter		14		14
Grand Total	1	40	1	42

South Dakota

SOUTH DAKOTA ACTIONS, BY ISSUE CATEGORY



South Dakota Enforcement Actions, by Issue Category, by Year

(SD)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1				3
Data Breach			2	1	2	5
Data Privacy			1		1	2
Platform Governance		1		3	2	6
Unwanted Calls			1	8	6	15
Grand Total	2	2	4	13	11	32

South Dakota Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust		3		3
Data Breach		5		5
Data Privacy		2		2
Platform Governance		6		6
Unwanted Calls		15		15
Grand Total		32		32

South Dakota Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust		3		3
Case/Settlement		3		3
Data Breach		5		5
Case/Settlement		4		4
Letter		1		1
Data Privacy		2		2
Case/Settlement		1		1
Letter		1		1
Platform Governance		6		6
Case/Settlement		1		1
Letter		5		5
Unwanted Calls		15		15
Investigation		1		1
Letter		14		14
Grand Total		32		32

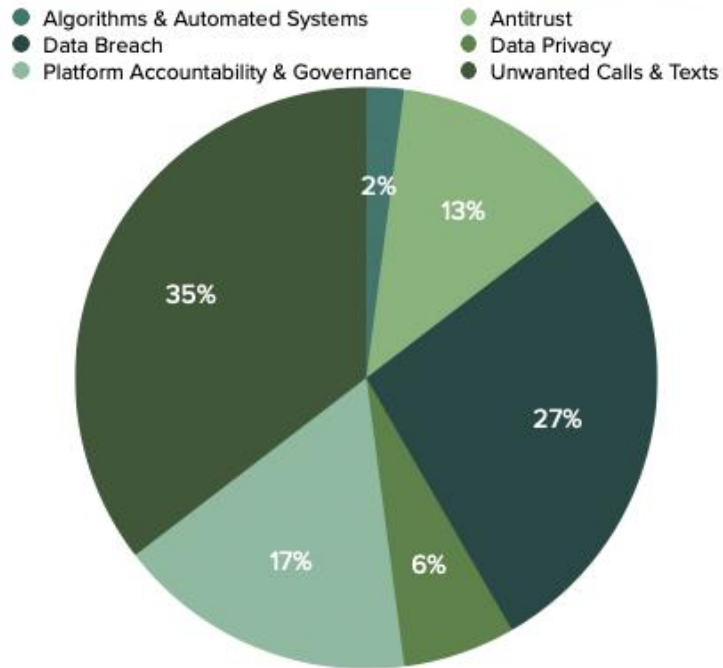
Additional South Dakota Enforcement Actions:

- In 2024, the South Dakota Attorney General announced an indictment for computer-generated child pornography.²⁴³ We did not include this in our report dataset because it was criminal charges against an individual, not against a company, but note it here as an important example of a State AG responding to misuses of artificial intelligence.

²⁴³ Press Release, *Attorney General Jackley Announces Indictment On First Computer-Generated Child Pornography Charges* (Sept. 17, 2024), <https://atg.sd.gov/OurOffice/Media/pressreleasesdetail.aspx?id=2652#gsc.tab=0>.

Tennessee

TENNESSEE ACTIONS, BY ISSUE CATEGORY



Tennessee Enforcement Actions, by Issue Category, by Year

(TN)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1	2	6
Data Breach	4	1	5	2	1	13
Data Privacy			2		1	3
Platform Governance		1	1	4	2	8
Unwanted Calls		1	1	9	6	17
Grand Total	6	4	9	17	12	48

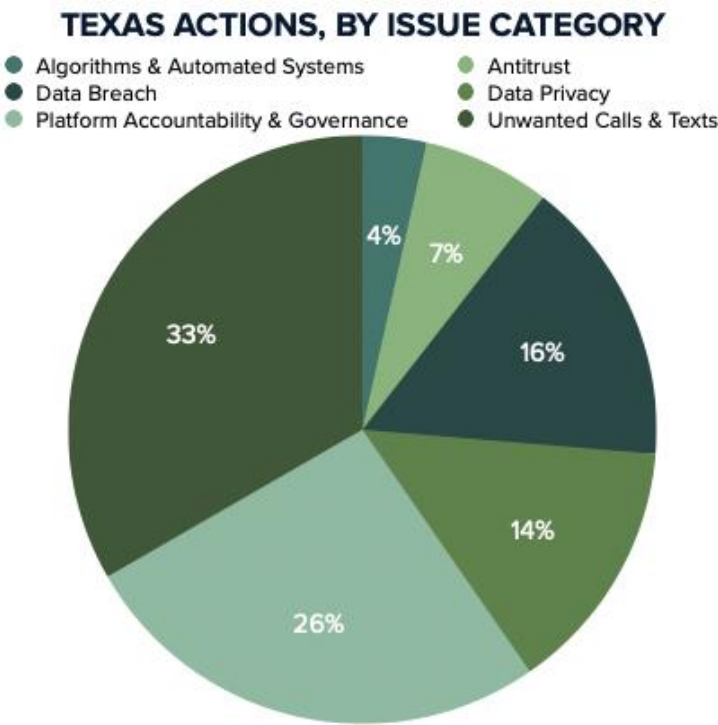
Tennessee Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	3	3		6
Data Breach		13		13
Data Privacy		3		3
Platform Governance		7	1	8
Unwanted Calls	1	16		17
Grand Total	4	43	1	48

Tennessee Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	3	3		6
Case/Settlement	3	3		6
Data Breach		13		13
Case/Settlement		12		12
Investigation		1		1
Data Privacy		3		3
Case/Settlement		1		1
Letter		2		2
Platform Governance		7	1	8
Case/Settlement		1	1	2
Investigation		1		1
Letter		5		5
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	4	43	1	48

Texas



Texas Enforcement Actions, by Issue Category, by Year

(TX)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1	1	2
Antitrust	3	1				4
Data Breach	3	1	3	1	1	9
Data Privacy			7		1	8
Platform Governance		2	2	2	9	15
Unwanted Calls	2	1	1	9	6	19
Grand Total	8	5	13	13	18	57

Texas Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	1	2
Antitrust	1	3		4
Data Breach		9		9
Data Privacy		3	5	8
Platform Governance		6	9	15
Unwanted Calls	1	17	1	19
Grand Total	2	39	16	57

Texas Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	1	2
Case/Settlement		1	1	2
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		9		9
Case/Settlement		9		9
Data Privacy		3	5	8
Case/Settlement			4	4
Letter		3	1	4
Platform Governance		6	9	15
Case/Settlement		1	5	6
Investigation		1	4	5
Letter		4		4
Unwanted Calls	1	17	1	19
Case/Settlement	1	2	1	4
Investigation		1		1
Letter		14		14
Grand Total	2	39	16	57

Additional Texas Enforcement Actions:

- In 2024, the Texas AG issued letters notifying over 100 companies that they failed to register as data brokers as required by the state's newly enacted data broker law.²⁴⁴
- In 2024, the Texas State AG announced investigations into fifteen companies related to privacy and data safety practices for minors, but only named four in its press release.²⁴⁵
- In 2024, the Texas State AG announced an investigation into "several car manufacturers" after reporting indicated the companies had been secretly collecting mass amounts of data about drivers and selling that data to third parties, including insurance providers.²⁴⁶ The Texas State AG did bring a related lawsuit against GM/Onstar in 2024.

²⁴⁴ Press Release, Attorney General Ken Paxton Notifies Over 100 Companies of their Apparent Failure to Comply with the Texas Data Broker Law that Protects Consumer Privacy (Jun. 18, 2024), <https://www.texasattorneygeneral.gov/news/releases/attorney-general-ken-paxton-notifies-over-100-companies-their-apparent-failure-comply-texas-data>.

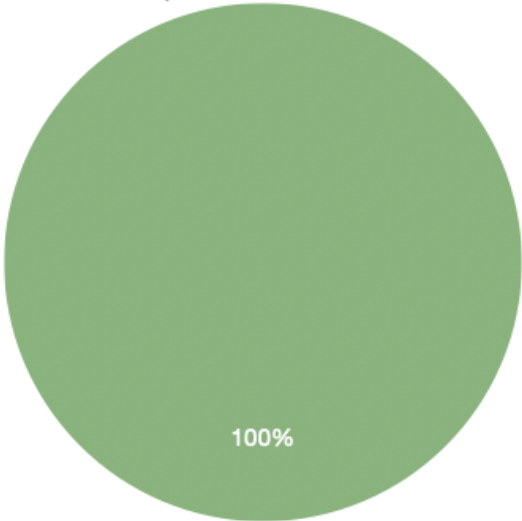
²⁴⁵ Press Release, Attorney General Ken Paxton Launches Investigations into Character.AI, Reddit, Instagram, Discord, and Other Companies over Children's Privacy and Safety Practices as Texas Leads the Nation on Data Privacy Enforcement (Dec. 12, 2024), <https://www.texasattorneygeneral.gov/news/releases/attorney-general-ken-paxton-launches-investigations-characterai-reddit-instagram-discord-and-other>.

²⁴⁶ Press Release, Attorney General Ken Paxton Opens Investigation into Car Manufacturers' Collection and Sale of Drivers' Data (Jun. 6, 2024), <https://www.texasattorneygeneral.gov/news/releases/attorney-general-ken-paxton-opens-investigation-car-manufacturers-collection-and-sale-drivers-data>.

U.S. Virgin Islands

U.S. VIRGIN ISLANDS ACTIONS, BY ISSUE CATEGORY

- Algorithms & Automated Systems
- Antitrust
- Data Breach
- Data Privacy
- Platform Accountability & Governance
- Unwanted Calls & Texts



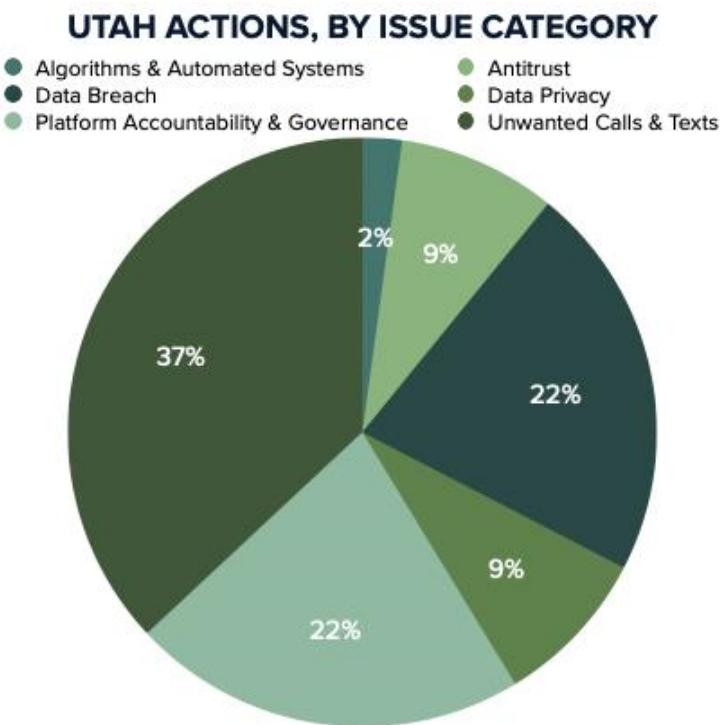
U.S. Virgin Islands Enforcement Actions, by Issue Category, by Year

(VI)	2020	2021	2022	2023	2024	Grand Total
Automated Systems						
Antitrust		1				1
Data Breach						
Data Privacy						
Platform Governance						
Unwanted Calls						
Grand Total		1				1

U.S. Virgin Islands Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems				
Antitrust		1		1
Case/Settlement		1		1
Data Breach				
Data Privacy				
Platform Governance				
Unwanted Calls				
Grand Total		1		1

Utah



Utah Enforcement Actions, by Issue Category, by Year

(UT)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	3	1				4
Data Breach	2	1	3	2	2	10
Data Privacy			4			4
Platform Governance		1	2	3	4	10
Unwanted Calls		1	1	9	6	17
Grand Total	5	4	10	15	12	46

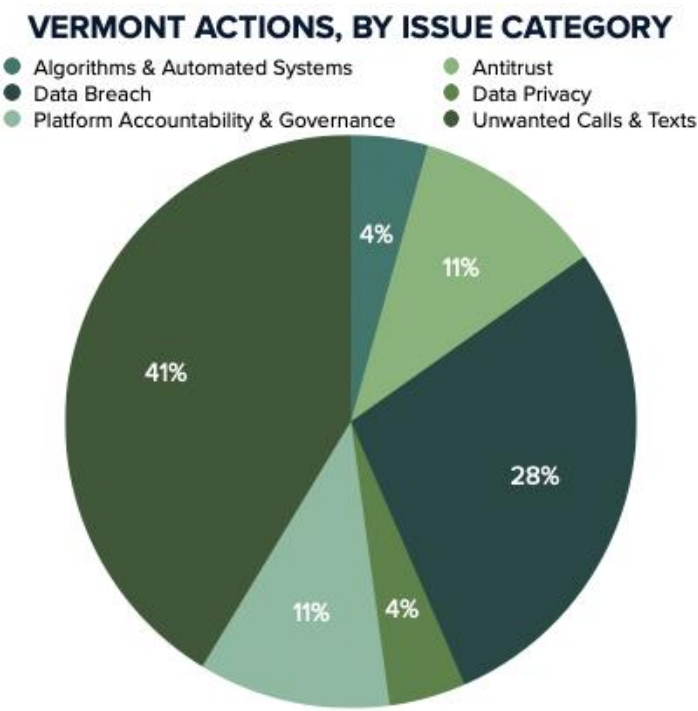
Utah Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust		4		4
Data Breach		10		10
Data Privacy		4		4
Platform Governance		7	3	10
Unwanted Calls	1	16		17
Grand Total	1	42	3	46

Utah Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust		4		4
Case/Settlement		4		4
Data Breach		10		10
Case/Settlement		9		9
Letter		1		1
Data Privacy		4		4
Case/Settlement		1		1
Letter		3		3
Platform Governance		7	3	10
Case/Settlement			3	3
Letter		7		7
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	1	42	3	46

Vermont



Vermont Enforcement Actions, by Issue Category, by Year

(VT)	2020	2021	2022	2023	2024	Grand Total
Automated Systems	1			1		2
Antitrust	2	1		1	1	5
Data Breach	3	1	5	2	2	13
Data Privacy			2			2
Platform Governance		1		2	2	5
Unwanted Calls		1	3	9	6	19
Grand Total	6	4	10	15	11	46

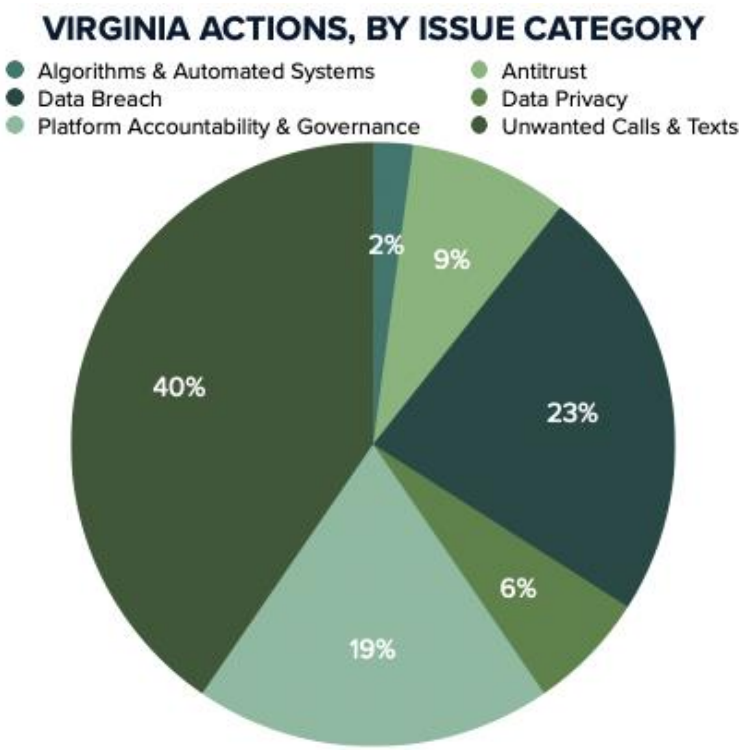
Vermont Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	1	2
Antitrust	2	3		5
Data Breach		13		13
Data Privacy		2		2
Platform Governance		3	2	5
Unwanted Calls		16	3	19
Grand Total	2	38	6	46

Vermont Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1	1	2
Case/Settlement		1	1	2
Antitrust	2	3		5
Case/Settlement	2	3		5
Data Breach		13		13
Case/Settlement		11		11
Investigation		1		1
Letter		1		1
Data Privacy		2		2
Case/Settlement		1		1
Letter		1		1
Platform Governance		3	2	5
Case/Settlement		1	2	3
Letter		2		2
Unwanted Calls		16	3	19
Case/Settlement		1	3	4
Investigation		1		1
Letter		14		14
Grand Total	2	38	6	46

Virginia



Virginia Enforcement Actions, by Issue Category, by Year

(VA)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1		4
Data Breach	3	1	5	1	1	11
Data Privacy			2		1	3
Platform Governance		1	3	3	2	9
Unwanted Calls	2	1	1	9	6	19
Grand Total	7	4	11	15	10	47

Virginia Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	1	3		4
Data Breach		11		11
Data Privacy		3		3
Platform Governance		9		9
Unwanted Calls	2	16	1	19
Grand Total	3	43	1	47

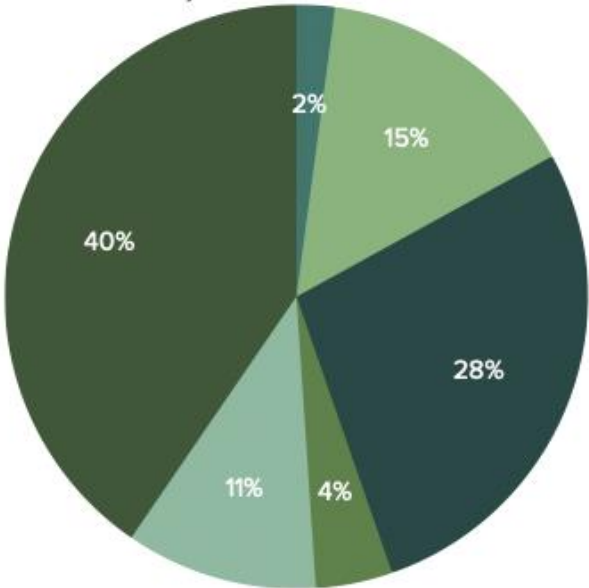
Virginia Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		11		11
Case/Settlement		10		10
Investigation		1		1
Data Privacy		3		3
Case/Settlement		1		1
Letter		2		2
Platform Governance		9		9
Case/Settlement		1		1
Investigation		1		1
Letter		7		7
Unwanted Calls	2	16	1	19
Case/Settlement	2	1	1	4
Investigation		1		1
Letter		14		14
Grand Total	3	43	1	47

Washington

WASHINGTON ACTIONS, BY ISSUE CATEGORY

- Algorithms & Automated Systems
- Data Breach
- Platform Accountability & Governance
- Antitrust
- Data Privacy
- Unwanted Calls & Texts



Washington Enforcement Actions, by Issue Category, by Year

(WA)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1	3	7
Data Breach	4	1	4	2	2	13
Data Privacy			2			2
Platform Governance		1		2	2	5
Unwanted Calls	1	2	1	9	6	19
Grand Total	7	5	7	15	13	47

Washington Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	3	3	1	7
Data Breach		13		13
Data Privacy		1	1	2
Platform Governance		4	1	5
Unwanted Calls	1	16	2	19
Grand Total	4	38	5	47

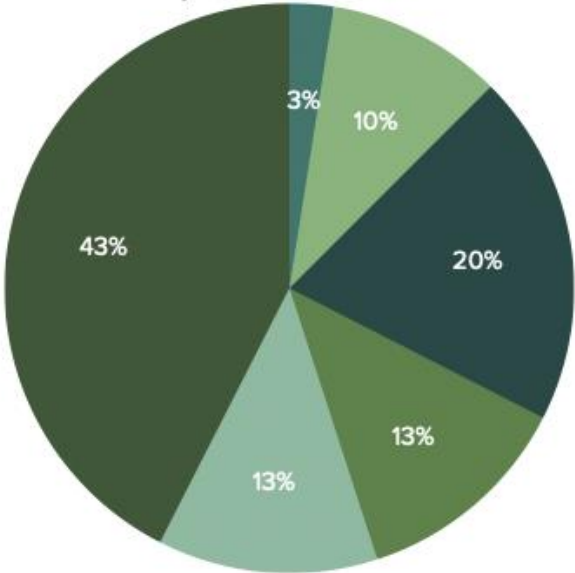
Washington Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	3	3	1	7
Case/Settlement	3	3	1	7
Data Breach		13		13
Case/Settlement		12		12
Letter		1		1
Data Privacy		1	1	2
Case/Settlement			1	1
Letter		1		1
Platform Governance		4	1	5
Case/Settlement		2	1	3
Letter		2		2
Unwanted Calls	1	16	2	19
Case/Settlement	1	1	2	4
Investigation		1		1
Letter		14		14
Grand Total	4	38	5	47

West Virginia

WEST VIRGINIA ACTIONS, BY ISSUE CATEGORY

- Algorithms & Automated Systems
- Antitrust
- Data Breach
- Data Privacy
- Platform Accountability & Governance
- Unwanted Calls & Texts



West Virginia Enforcement Actions, by Issue Category, by Year

(WV)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1		4
Data Breach	3	1	1	2	1	8
Data Privacy			3	1	1	5
Platform Governance				3	2	5
Unwanted Calls		1	1	9	6	17
Grand Total	5	3	5	17	10	40

West Virginia Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	1	3		4
Data Breach		8		8
Data Privacy		5		5
Platform Governance		5		5
Unwanted Calls	1	16		17
Grand Total	2	38		40

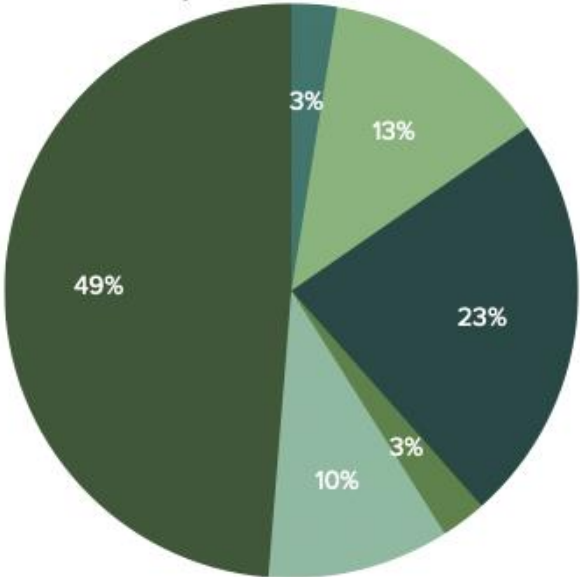
West Virginia Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		8		8
Case/Settlement		8		8
Data Privacy		5		5
Case/Settlement		1		1
Letter		4		4
Platform Governance		5		5
Case/Settlement		1		1
Letter		4		4
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	2	38		40

Wisconsin

WISCONSIN ACTIONS, BY ISSUE CATEGORY

- Algorithms & Automated Systems
- Data Breach
- Platform Accountability & Governance
- Antitrust
- Data Privacy
- Unwanted Calls & Texts



Wisconsin Enforcement Actions, by Issue Category, by Year

(WI)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1		1	1	5
Data Breach	2		4	2	1	9
Data Privacy			1			1
Platform Governance		1		2	1	4
Unwanted Calls		2	2	9	6	19
Grand Total	4	4	7	15	9	39

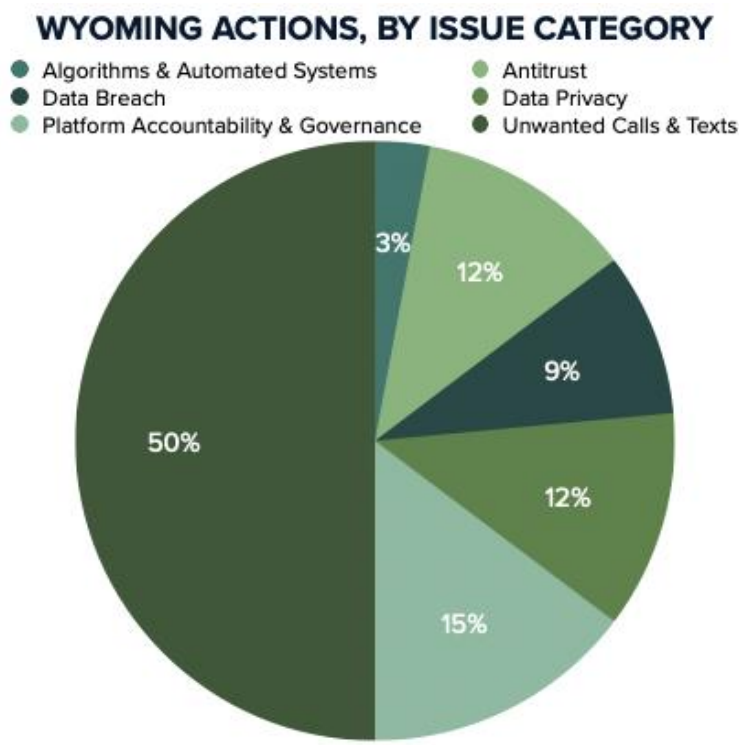
Wisconsin Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	3	2		5
Data Breach		9		9
Data Privacy		1		1
Platform Governance		4		4
Unwanted Calls	1	16	2	19
Grand Total	4	33	2	39

Wisconsin Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	3	2		5
Case/Settlement	3	2		5
Data Breach		9		9
Case/Settlement		9		9
Data Privacy		1		1
Case/Settlement		1		1
Platform Governance		4		4
Case/Settlement		2		2
Letter		2		2
Unwanted Calls	1	16	2	19
Case/Settlement	1	1	2	4
Investigation		1		1
Letter		14		14
Grand Total	4	33	2	39

Wyoming



Wyoming Enforcement Actions, by Issue Category, by Year

(WY)	2020	2021	2022	2023	2024	Grand Total
Automated Systems				1		1
Antitrust	2	1			1	4
Data Breach			1	1	1	3
Data Privacy			3	1		4
Platform Governance		1		2	2	5
Unwanted Calls		1	1	9	6	17
Grand Total	2	3	5	14	10	34

Wyoming Enforcement Actions, by Issue Category, by Fed/Multistate Status

Issue Category	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Antitrust	1	3		4
Data Breach		3		3
Data Privacy		4		4
Platform Governance		5		5
Unwanted Calls	1	16		17
Grand Total	2	32		34

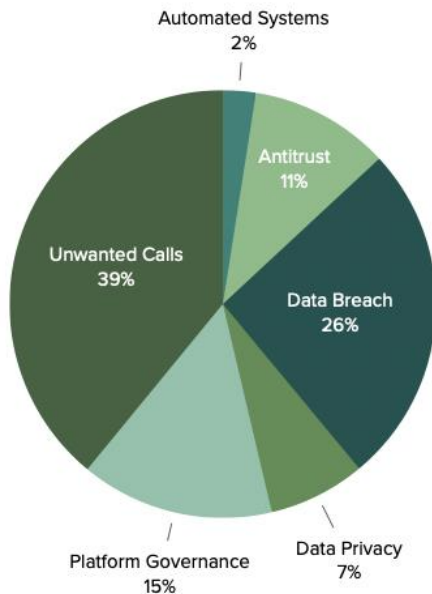
Wyoming Enforcement Actions, by Issue Category, by Fed/Multistate Status, by Type of Enforcement Action

Issue Category and Type of Enforcement Action	Fed. & Multistate	Multistate	Single State	Grand Total
Automated Systems		1		1
Case/Settlement		1		1
Antitrust	1	3		4
Case/Settlement	1	3		4
Data Breach		3		3
Case/Settlement		3		3
Data Privacy		4		4
Case/Settlement		1		1
Letter		3		3
Platform Governance		5		5
Letter		5		5
Unwanted Calls	1	16		17
Case/Settlement	1	1		2
Investigation		1		1
Letter		14		14
Grand Total	2	32		34

Appendix 6: Data Visualizations

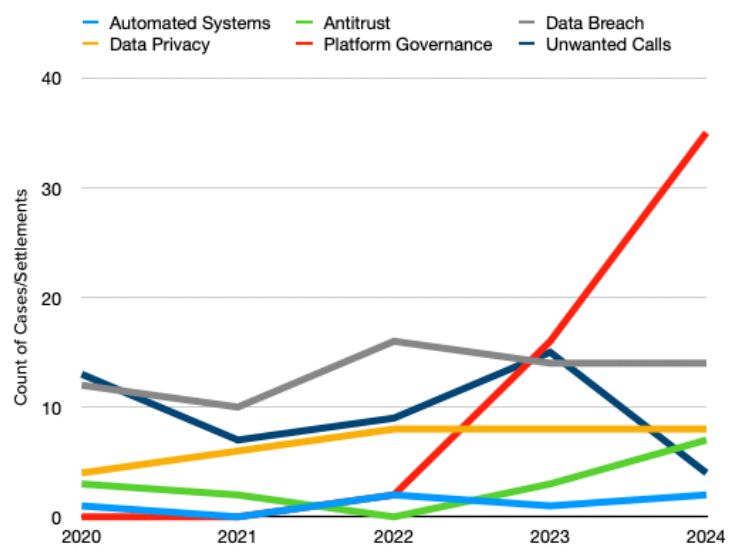
Notable Takeaways

TOTAL ACTIONS, BY ISSUE CATEGORY



Appears on pages 3 and 9

INDIVIDUAL CASES, BY ISSUE CATEGORY



Appears on pages 3 and 17

Methodology

Issue Category	TOTAL ACTIONS	%
Automated Systems	58	2.49%
Antitrust	247	10.61%
Data Breach	602	25.86%
Data Privacy	171	7.35%
Platform Governance	341	14.65%
Unwanted Calls	909	39.05%
Grand Total	2328	100%

Appears on page 13

Issue Category	INDIVIDUAL CASES	%
Automated Systems	6	2.70%
Antitrust	15	6.76%
Data Breach	66	29.73%
Data Privacy	34	15.32%
Platform Governance	53	23.87%
Unwanted Calls	48	21.62%
Grand Total	222	100%

Appears on page 13

Issue Category	CASES GROUPED BY DEF./ MISCONDUCT	%
Automated Systems	6	3.70%
Antitrust	8	4.94%
Data Breach	63	38.89%
Data Privacy	25	15.43%
Platform Governance	18	11.11%
Unwanted Calls	42	25.93%
Grand Total	162	100%

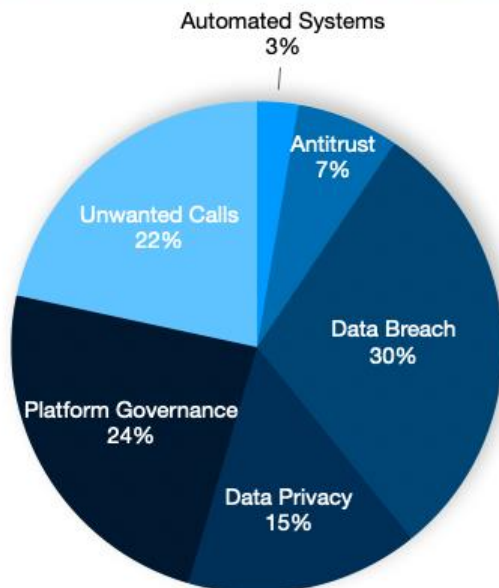
Appears on page 13

Enforcement Action Counts by Issue Category

Issue Category	Total Actions	%	Individual Cases	%	Grouped Cases	%
Automated Systems	58	2.49%	6	2.70%	6	3.70%
Antitrust	247	10.61%	15	6.76%	8	4.94%
Data Breach	602	25.86%	66	29.73%	63	38.89%
Data Privacy	171	7.35%	34	15.32%	25	15.43%
Platform Governance	341	14.65%	53	23.87%	18	11.11%
Unwanted Calls	909	39.05%	48	21.62%	42	25.93%
Grand Total	2328		222		162	

Appears on page 14

INDIVIDUAL CASES, BY ISSUE CATEGORY



Appears on page 15

Enforcement Actions & Collaboration

Types of Enforcement Action by Issue Category

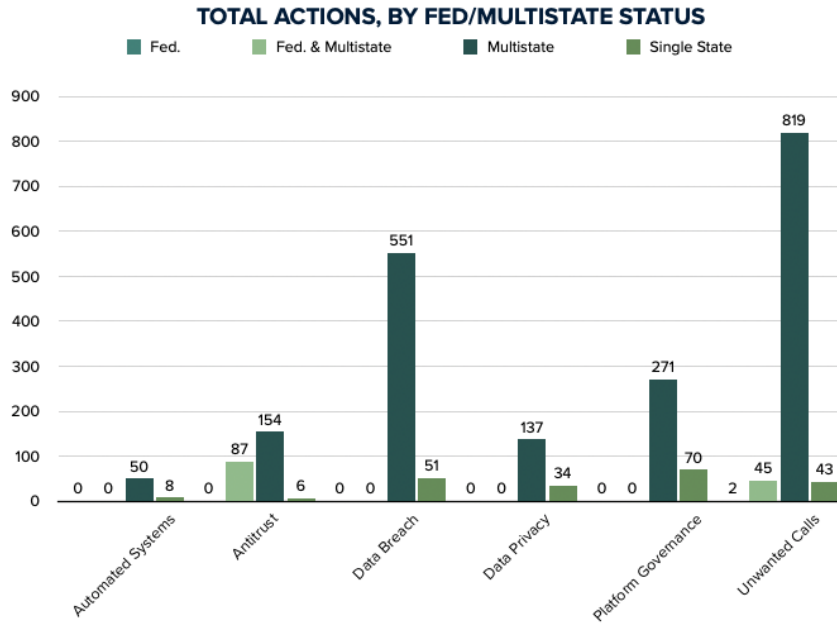
Total Actions	Investigations	%	Letters	%	Cases	%	Grand Total	%
Automated Systems	1	1.01%	2	0.20%	55	4.56%	58	2.49%
Antitrust	0	0.00%	0	0.00%	247	20.48%	247	10.61%
Data Breach	15	15.15%	23	2.25%	564	46.77%	602	25.86%
Data Privacy	0	0.00%	93	9.09%	78	6.47%	171	7.35%
Platform Governance	30	30.30%	194	18.96%	117	9.70%	341	14.65%
Unwanted Calls	53	53.54%	711	69.50%	145	12.02%	909	39.05%
Grand Total	99		1023		1206		2328	

Appears on page 21

Case and Settlement Counts by Issue Category

Issue Category	TOTAL CASES	%	INDIVIDUAL CASES	%	GROUPED CASES	%
Automated Systems	55	4.56%	6	2.70%	6	3.70%
Antitrust	247	20.48%	15	6.76%	8	4.94%
Data Breach	564	46.77%	66	29.73%	63	38.89%
Data Privacy	78	6.47%	34	15.32%	25	15.43%
Platform Governance	117	9.70%	53	23.87%	18	11.11%
Unwanted Calls	145	12.02%	48	21.62%	42	25.93%
Grand Total	1206		222		162	

Appears on page 22



Appears on page 23

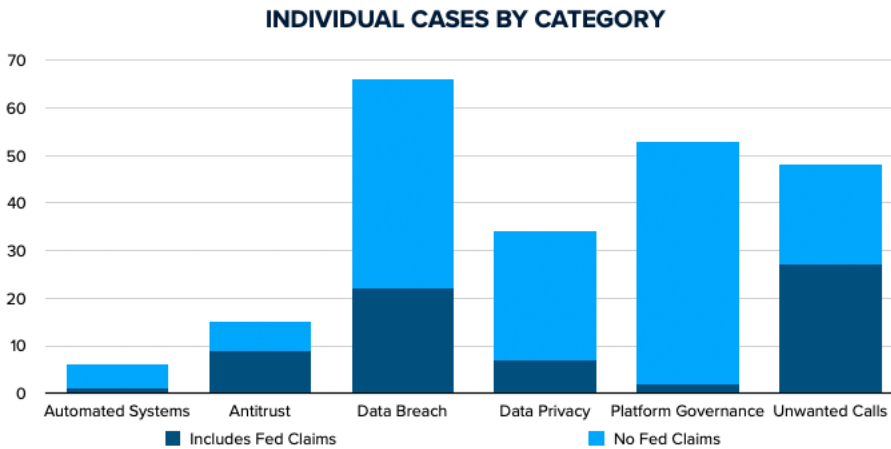
Enforcement Actions by Fed/Multistate Status

	TOTAL Actions*	%	INDIVIDUAL Cases	%	Cases GROUPED by Def./ Misconduct	%
Fed.	2	0.09%	2	0.90%	2	1.23%
Fed. & Multistate	132	5.67%	8	3.60%	8	4.94%
Multistate	1982	85.14%	31	13.96%	29	17.90%
Single State	212	9.11%	181	81.53%	123	75.93%
Grand Total	2328		222		162	

**Recall that Total Actions include letters and investigations, not merely cases and settlements*

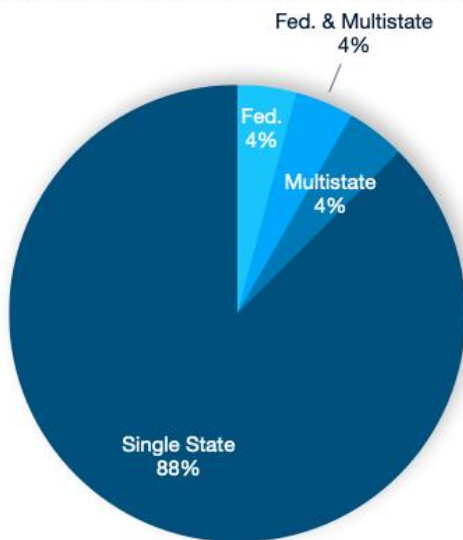
Appears on page 24

Unwanted Calls & Texts



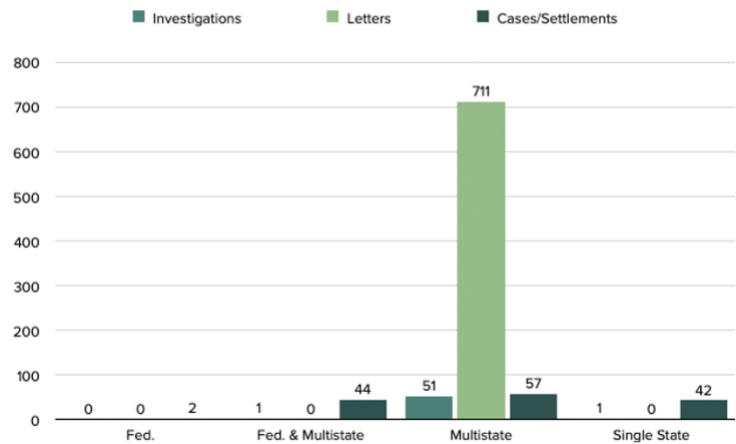
Appears on page 29 and at the beginning of each Issue Category on pages 45, 57, 63, 73, and 82

INDIVIDUAL UNWANTED CALLS CASES/ SETTLEMENTS, BY FED/MULTISTATE STATUS



Appears on page 33

TOTAL UNWANTED CALLS & TEXTS ACTIONS, BY FED/MULTISTATE STATUS AND ENFORCEMENT TYPE

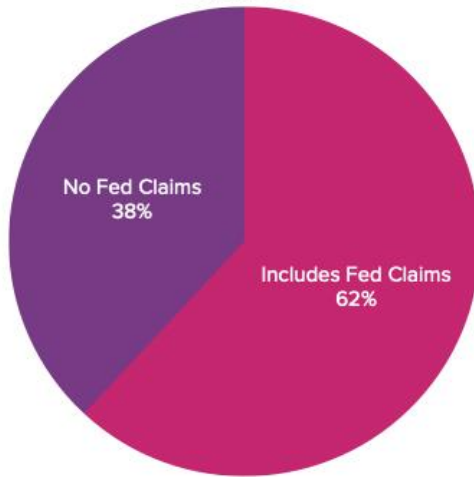


Appears on page 34

Unwanted Calls & Texts Enforcement Target Includes	Count of Cases Grouped-by-Def./ Misconduct	Count of Distinct Letters
Caller (if different from Beneficiary Company)	11	0
Beneficiary Company	16	0
Lead Generator	1	0
Voice Service Provider	13	15
Grand Total	41	15

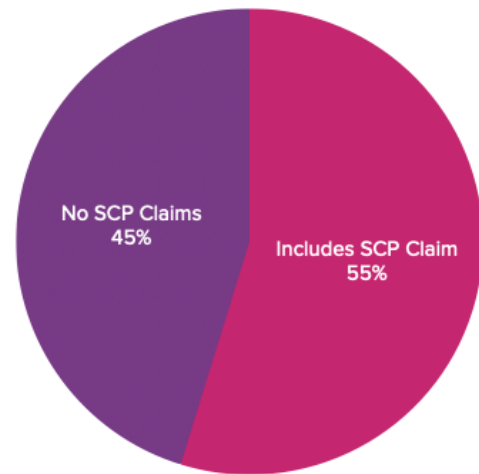
Appears on page 35

**UNWANTED CALLS IN GROUPE-BY-DEF./
MISCONDUCT CASES DATASET, BY FED CLAIM
STATUS**



Appears on page 36

**UNWANTED CALLS IN GROUPE-BY-DEF./
MISCONDUCT CASES DATASET, BY STATE
CONSUMER PROTECTION (SCP) CLAIM STATUS**



Appears on page 36

Data Breach

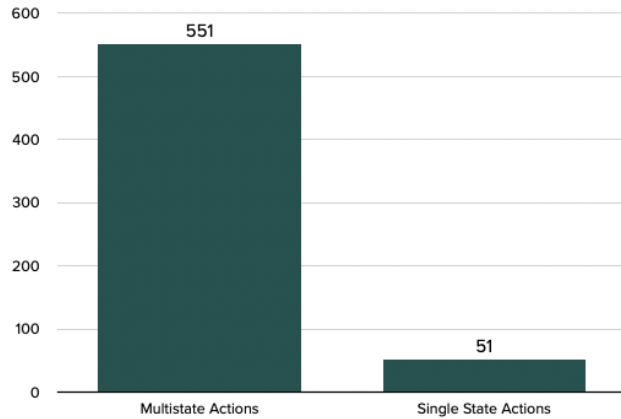
Ten Largest Multistate Enforcement Actions on Data Breaches by Number of States Participating

# State AGs	Year	Description	Claims
50	2024	Marriott	State Consumer Protection; State PIP/Breach
50	2023	Blackbaud	HIPAA; State Consumer Protection; State PIP/Breach
47	2020	Home Depot	State Consumer Protection; State PIP/Breach
46	2022	Carnival Cruise	State Consumer Protection; State PIP/Breach
43	2020	Anthem	HIPAA; State Consumer Protection; State PIP/Breach
41	2021	AMCA	State Consumer Protection; State PIP/Breach
40	2022	T-Mobile	State Consumer Protection; State PIP/Breach
40	2022	Experian Info Solutions/T-Mobile	State Consumer Protection; State PIP/Breach
40	2022	Experian Data Corp/Court Ventures	State Consumer Protection; State PIP/Breach
33	2023	Inmediata	HIPAA; State Consumer Protection; State PIP/Breach

Note: Not reflected in the counts for Blackbaud and Anthem are California's respective settlements, reached separately from the Multistate actions.

Appears on page 48

**TOTAL DATA BREACH ACTIONS,
BY FED/MULTISTATE STATUS**



Appears on page 49

**INDIVIDUAL DATA BREACH CASES/SETTLEMENTS, BY
FED CLAIM STATUS**



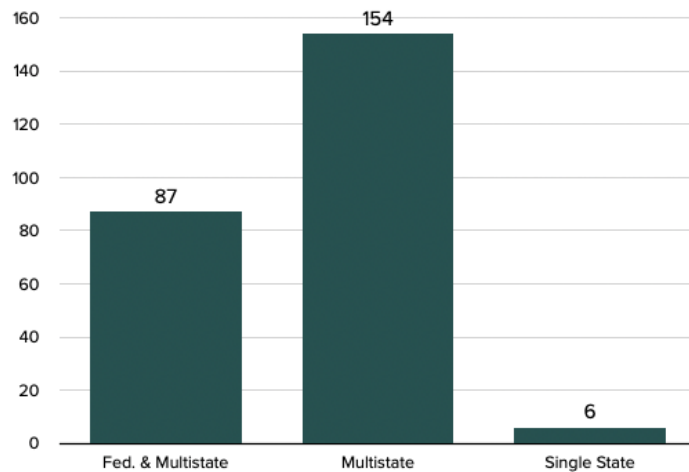
Appears on page 50

Total Actions	Investigations	Letters	Cases/ Settlements	Grand Total
Data Breach	15	23	564	602

Appears on page 49

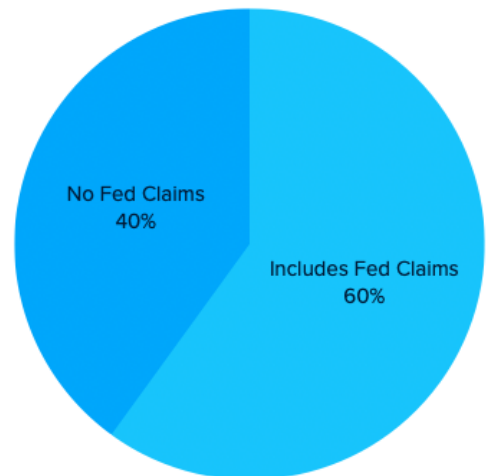
Antitrust

**TOTAL ANTITRUST CASES/SETTLEMENTS,
BY FED/MULTISTATE STATUS**



Appears on page 58

**INDIVIDUAL ANTITRUST CASES/
SETTLEMENTS, BY FED CLAIM STATUS**

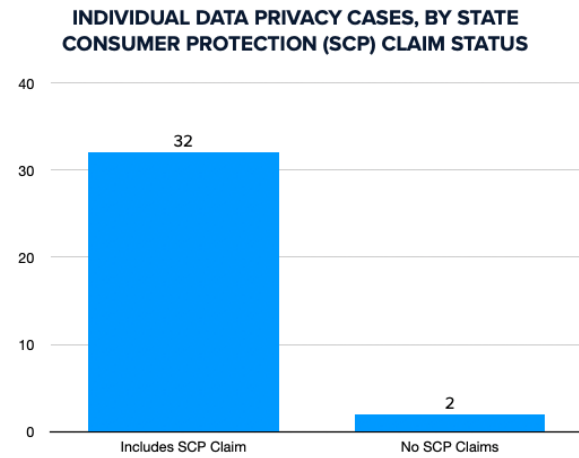


Appears on page 59

Total Actions	Investigations	Letters	Cases/ Settlements	Grand Total
Antitrust	0	0	247	247

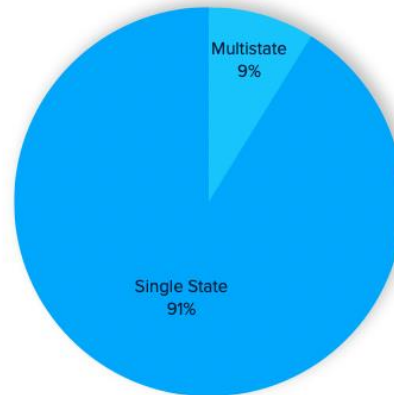
Appears on page 58

Data Privacy



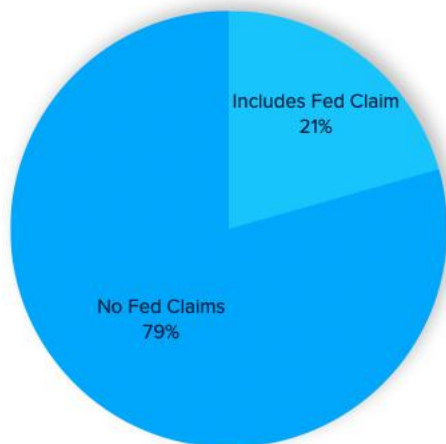
Appears on page 64

INDIVIDUAL DATA PRIVACY CASES, BY FED/MULTISTATE STATUS



Appears on page 65

INDIVIDUAL DATA PRIVACY CASES, BY FED CLAIM STATUS



Appears on page 65

Total Actions	Investigations	Letters	Cases/ Settlements	Grand Total
Data Privacy	0	93	78	171

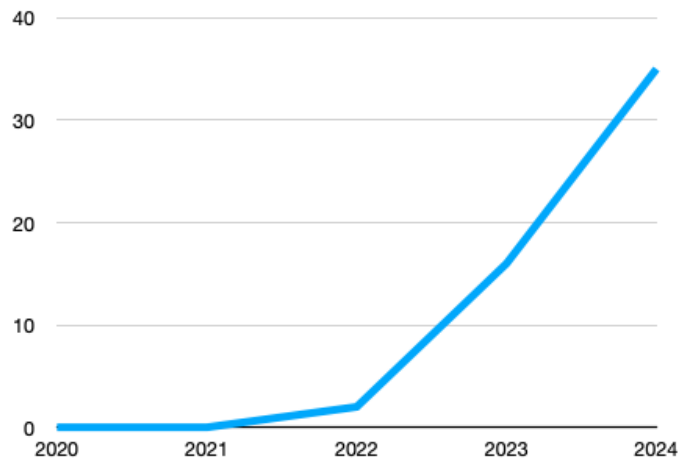
Appears on page 65

Platform Accountability & Governance

Platform Governance	2020	2021	2022	2023	2024	Grand Total
Total	2	57	48	128	107	342
Individual	0	0	2	16	35	53
Grouped-by-Def./ Misconduct	0	0	2	3	13	18

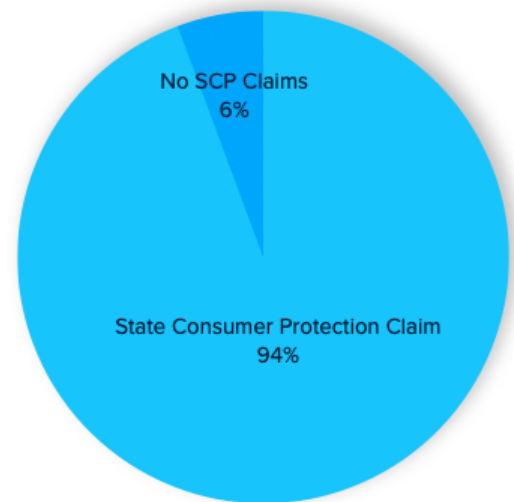
Appears on page 76

INDIVIDUAL ACTIONS (PLATFORM GOVERNANCE)



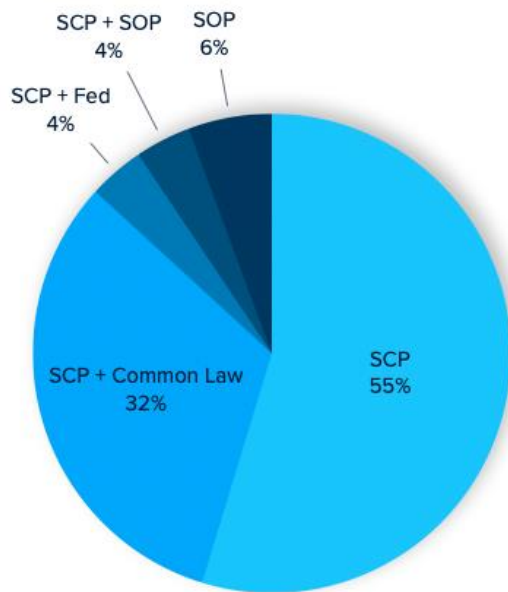
Appears on page 76

INDIVIDUAL PLATFORM GOVERNANCE ACTIONS WITH 1+ SCP CLAIM



Appears on page 77

INDIVIDUAL PLATFORM GOVERNANCE ACTIONS, BY CLAIM TYPE



Appears on page 77

Algorithms & Automated Systems

Algorithms & Automated Systems Enforcement Descriptions	Total Actions	Individual Cases	Cases Grouped-by-Def./ Misconduct
Equifax	1	1	1
Clearview AI	1	1	1
Buildium	1	1	1
Tenant Turner	1	1	1
ACI	50	1	1
Pieces Technologies	1	1	1
Google Gemini letter	1	n/a	n/a
Investigation into investment advisor use of AI	1	n/a	n/a
Inquiry letter to Madison Square Garden re: use of facial recognition	1	n/a	n/a
Grand Total Enforcement Actions	58 (55 Cases)	6	6

Appears on page 84