

TO: North Carolina General Assembly and North Carolina Governor Roy Cooper

FROM: Niharika Vattikonda, Duke Cyber Policy and Gender Violence Initiative

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*Survivors of Domestic Violence Face Privacy Barriers in North Carolina Business Registration*

**Executive Summary**

Sometimes the release of public records—containing deeply personal information, such as a home address—is a life or death decision. Those records can then be accessed by anyone, regardless of their intent, and this poses a unique risk to survivors of domestic violence, for whom privacy is critical for their safety. Data brokers—websites that aggregate and sell personal data without screening for malicious use—have found a source of information in public records databases. Several of these data brokers specialize in “people search products,” which allow anyone to search for private details—including addresses—of individuals. In North Carolina, public records databases include business registration filings, which include full names, mailing addresses, and business addresses.

For survivors of domestic violence, specifically those who have faced economic abuse, small business ownership can provide a path towards economic independence. However, registering businesses operated from home may result in home addresses appearing on these public-facing databases, which can then be scraped by data brokers for their search products. While North Carolina operates an Address Confidentiality Program to provide survivors with a substitute mailing address, that protection is not extended to business registration, not all forms of mail are covered, and private companies are not obligated to honor substitute addresses.

The North Carolina General Assembly and Gov. Cooper, in order to empower survivors to register their businesses without fear of compromising their privacy, should work with the Department of Justice to expand the jurisdiction and qualifications of the Address Confidentiality Program, protect certain types of business addresses from appearing in public-facing databases, and create a confidential micro-grant program for survivors who pursue entrepreneurship. This approach will allow survivors to grow as entrepreneurs and support their families and communities without compromising their privacy and security.

### **Public Records Databases and Data Brokers**

Data brokers are known for aggregating personal data—sometimes reaching into billions of data points added per month—without the knowledge or consent of the individuals to whom that data relates.<sup>1</sup> In a cross-sectional study of nine data brokers, the Federal Trade Commission (FTC) found that the data brokers’ collection of personal data can pose risks for individuals, including unanticipated uses of the data by third parties and indefinite data retention without clear recourse or choices for people who are adversely affected.<sup>2</sup> According to the FTC study, the nine data brokers offered products in three main categories: marketing research, risk mitigation (identity verification and fraud detection), and people search.<sup>3</sup> The nine brokers generated approximately \$426 million of revenue in 2012 from these products, and just over \$52 million of that revenue came from “people search” products.<sup>4</sup>

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<sup>1</sup> “FTC Recommends Congress Require the Data Broker Industry to Be More Transparent and Give Consumers Greater Control Over Their Personal Information.” *Federal Trade Commission*, 24 May 2019, [www.ftc.gov/news-events/press-releases/2014/05/ftc-recommends-congress-require-data-broker-industry-be-more](http://www.ftc.gov/news-events/press-releases/2014/05/ftc-recommends-congress-require-data-broker-industry-be-more).

<sup>2</sup> *Ibid.*

<sup>3</sup> Federal Trade Commission, *Data Brokers: A Call for Transparency and Accountability*, May 2014, 23, 32 <https://www.ftc.gov/system/files/documents/reports/data-brokers-call-transparency-accountability-report-federal-trade-commission-may-2014/140527databrokerreport.pdf>.

<sup>4</sup> *Ibid.*, 23.

For survivors of domestic violence, these “people search” products pose a substantial risk because of the sheer amount of data aggregated and made publicly available by data brokers. The FTC found that these search products are unique in that the target user is often an individual, rather than an organization; the user only needs just one piece of data (a name, address, phone number, email, Social Security Number, etc.) to use these products.<sup>5</sup> These search products can provide everything from aliases and addresses to civil records, social media information, and neighbors—some data brokers provide these searches for free, whereas others charge users for their people search products.<sup>6</sup> A recent law in Vermont required third parties that buy and sell personal data to register with the state—the list of 121 registered data brokers included major players in the people search product market, including Spokeo, ZoomInfo, White Pages, People Smart, Intelius, and PeopleFinders.<sup>7</sup>

Unlike other data brokers focused on marketing and risk mitigation, data brokers that provide people search products source publicly-available data for their products.<sup>8</sup> From government records, these products are able to find data on civil records, property ownership and sales history, address history, marriage/divorce records, and more.<sup>9</sup> Furthermore, the FTC found that data brokers generally do not screen or monitor clients’ use of the people search products—companies may have Terms of Use that prohibit use of data for unlawful purposes, but screening and auditing of their clients’ activity is minimal.<sup>10</sup> Currently, there is no federal law that

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<sup>5</sup> Ibid, 34.

<sup>6</sup> Ibid, 34.

<sup>7</sup> Pasternack, Alex. “Here Are the Data Brokers Quietly Buying and Selling Your Personal Information.” *Fast Company*, Fast Company, 28 May 2019, [www.fastcompany.com/90310803/here-are-the-data-brokers-quietly-buying-and-selling-your-personal-information](http://www.fastcompany.com/90310803/here-are-the-data-brokers-quietly-buying-and-selling-your-personal-information).

<sup>8</sup> Federal Trade Commission, *Data Brokers: A Call for Transparency and Accountability*, May 2014, 38 <https://www.ftc.gov/system/files/documents/reports/data-brokers-call-transparency-accountability-report-federal-trade-commission-may-2014/140527databrokerreport.pdf>.

<sup>9</sup> Ibid, 34.

<sup>10</sup> Ibid, 41.

prohibits data brokers from making personal data publicly available, and data brokers are not obligated to honor requests for information to be removed or edited.<sup>11</sup>

Public records databases—at the local, state, and federal levels—have been increasingly made available online over the past three decades.<sup>12</sup> Maintaining public records databases online has been a powerful tool of accountability, but some of these digitized records may contain sensitive information that may pose personal safety risks for victims of domestic violence.<sup>13</sup> Online public records databases also compromise the modicum of privacy that was available when public records that only existed in paper and microfiche copies—this “practical obscurity” meant that individuals interested in accessing public records databases had to request the records from a clerk in person.<sup>14</sup> Storage constraints limited the records that were available for request, and available records were often only accessible locally.<sup>15</sup>

The practical difficulty of accessing public records in person meant that individuals could not scan through numerous records at once—they had to request specific records about specific individuals.<sup>16</sup> Now, with public records available to anyone with access to Internet, data brokers are able to take advantage of web scraping in order to aggregate that disparate information for their own people search products.<sup>17</sup> Public records, which were once disaggregated by agency and locality, can now be easily accessed online—persistent users can search through millions of

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<sup>11</sup> “Tutorial: Data Brokers and People Search Sites.” *Privacy Rights Clearinghouse*, 24 Apr. 2017, [privacyrights.org/resources/tutorial-data-brokers-and-people-search-sites](http://privacyrights.org/resources/tutorial-data-brokers-and-people-search-sites).

<sup>12</sup> “Public Records on the Internet: The Privacy Dilemma.” *Privacy Rights Clearinghouse*, 23 July 2002, [privacyrights.org/resources/public-records-internet-privacy-dilemma](http://privacyrights.org/resources/public-records-internet-privacy-dilemma).

<sup>13</sup> *Ibid.*

<sup>14</sup> *Ibid.*

<sup>15</sup> Solove, Daniel J., Access and Aggregation: Privacy, Public Records, and the Constitution. *Minnesota Law Review*, Vol. 86, No. 6, 2002, Available at SSRN: <https://ssrn.com/abstract=283924> or <http://dx.doi.org/10.2139/ssrn.283924>.

<sup>16</sup> *Ibid.*

<sup>17</sup> Gamez, Marisel. “Legal Developments Regarding Data Brokers.” *FIU Law*, *FIU Law Review*, 21 Mar. 2017, [law.fiu.edu/2017/03/21/legal-developments-regarding-data-brokers/](http://law.fiu.edu/2017/03/21/legal-developments-regarding-data-brokers/).

records at once, much more anonymously than they would be in a clerk's office.<sup>18</sup> Stalkers can easily access these “one-stop” digital access points to gather personal details, including current addresses, about their victims.

### **Domestic Violence and Data Privacy in North Carolina**

Nationally, about 1 in 3 women and 1 in 4 men have been victims of intimate-partner violence.<sup>19</sup> In North Carolina, 43.9% of women and 19.3% of men have experienced physical violence, sexual violence, or stalking from an intimate partner throughout their lives.<sup>20</sup> Abusive tendencies may span from physical violence to emotional manipulation, all of which are dangerous to the victim, as the abuser's goal is to gain control over the victim.<sup>21</sup> Even after the victim is able to escape or terminate the abusive relationship, the abuser will often retaliate through stalking or harassment—for context, in about a third of homicides involving a restraining order, the victim was murdered within the first month after the order was granted.<sup>22</sup> As such, survivors need to be able to leave abusive relationships and remain outside their abusers' spheres of control, which are increasingly moving into the digital space.

As victims try to gain independence from their abusers, many are concerned about ongoing stalking—recently, cyberstalking has become a more frequent tool used in domestic abuse.<sup>23</sup> Domestic violence organization volunteers advise victims to turn off their cell phones,

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<sup>18</sup> Solove, Daniel J., *Access and Aggregation: Privacy, Public Records, and the Constitution*. *Minnesota Law Review*, Vol. 86, No. 6, 2002, Available at SSRN: <https://ssrn.com/abstract=283924> or <http://dx.doi.org/10.2139/ssrn.283924>.

<sup>19</sup> *Domestic Violence in North Carolina*. National Coalition Against Domestic Violence, 2019, [assets.speakcdn.com/assets/2497/north\\_carolina\\_2019.pdf](https://assets.speakcdn.com/assets/2497/north_carolina_2019.pdf).

<sup>20</sup> *Ibid.*

<sup>21</sup> *What Is Domestic Violence?* National Coalition Against Domestic Violence, [ncadv.org/learn-more](http://ncadv.org/learn-more).

<sup>22</sup> *Ibid.*

<sup>23</sup> Shahani, Aarti. “Smartphones Are Used To Stalk, Control Domestic Abuse Victims.” *NPR*, NPR, 15 Sept. 2014, [www.npr.org/sections/alltechconsidered/2014/09/15/346149979/smartphones-are-used-to-stalk-control-domestic-abuse-victims](http://www.npr.org/sections/alltechconsidered/2014/09/15/346149979/smartphones-are-used-to-stalk-control-domestic-abuse-victims).

GPS, Wi-Fi, and social media accounts—this “digital detox” is essential for victims to avoid being found with spyware tools.<sup>24</sup> Out of over seventy domestic violence shelters in the U.S., 85% have worked with victims who were being tracked through GPS; almost half of those shelters prohibit Facebook on the shelter’s premises to prevent stalkers from locating survivors.<sup>25</sup> In the age of Google, where an abuser can find addresses or phone numbers online, strong data privacy protections are critical for survivors.

### **Consequences of Domestic Violence and Resultant Trauma**

The physical consequences of domestic violence appear in the short and long term: physical violence, unwanted pregnancies, and sexually transmitted infections can lead to problems with immunity, substance abuse, chronic pain, nightmares, and heart problems—traumatic brain injury is a serious issue that results from head injuries and can cause ongoing issues with speech, memory, concentration, and sleep.<sup>26</sup> Beyond physical consequences and injuries, domestic violence can also lead to mental health problems, including depression, anxiety, posttraumatic stress disorder (PTSD), and suicide; the long-term health problems are expected to affect women at higher levels.<sup>27</sup> The psychological injury and resultant trauma may also put women at a higher risk for repeat victimization, as women may return to similarly abusive relationships, which then compounds the long-term physical and mental health problems, as well as the risk of suicide.<sup>28</sup>

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<sup>24</sup> Ibid.

<sup>25</sup> Ibid.

<sup>26</sup> “Health Effects of Violence.” *Womenshealth.gov*, 30 Jan. 2019, [www.womenshealth.gov/relationships-and-safety/effects-violence-against-women](http://www.womenshealth.gov/relationships-and-safety/effects-violence-against-women).

<sup>27</sup> Alejo, Kavita. “Long-Term Physical and Mental Health Effects of Domestic Violence.” *Themis: Research Journal of Justice Studies and Forensic Science*, vol. 2, 2014, [scholarworks.sjsu.edu/cgi/viewcontent.cgi?article=1016&context=themis](http://scholarworks.sjsu.edu/cgi/viewcontent.cgi?article=1016&context=themis).

<sup>28</sup> Ibid.

Nearly all victims also experience economic abuse, defined as controlling financial resources in order to force the victim to be financially dependent on the abuser.<sup>29</sup> Economic abuse takes several forms: employment-related abuse to sabotage the victim's earning potential, withholding access from existing funds or actively spending funds belonging to the victim, and coercive credit-related transactions that are designed to accumulate debt under the victim's name.<sup>30</sup> This form of abuse will often result in financial dependence, meaning that victims may be forced to stay in abusive relationships—especially with coercive debt, as the consequences for a victim's credit report may result in the victim not being able to gain employment, rent an apartment, or gain any capital they'll need to support themselves.<sup>31</sup>

### **Economic Independence Through Entrepreneurship for Victims of Domestic Violence**

While domestic violence has profound implications for victims' physical, mental, and financial health, women experiencing domestic violence may find employment to be a way to rebuild confidence and self-esteem, especially after escaping an abusive relationship. Positive work experiences have been shown to improve women's sense of competency at work, which is related to higher general self-esteem for women experiencing domestic violence.<sup>32</sup>

Entrepreneurship may provide an alternative to traditional employment for survivors who have faced employment-related economic abuse and are struggling to build a career at a traditional workplace. Owning and growing a small business is also a viable path to economic independence, and for survivors, this may rebuild confidence and act as a deterrent to repeat

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<sup>29</sup> *Quick Guide: Economic and Financial Abuse*. National Coalition Against Domestic Violence, [ncadv.org/blog/posts/quick-guide-economic-and-financial-abuse](http://ncadv.org/blog/posts/quick-guide-economic-and-financial-abuse).

<sup>30</sup> *Ibid.*

<sup>31</sup> *Ibid.*

<sup>32</sup> Lynch, Shannon M., and Sandra A. Graham-Bermann. "Exploring the Relationship Between Positive Work Experiences and Women's Sense of Self in the Context of Partner Abuse." *Psychology of Women Quarterly*, vol. 28, no. 2, 2004, pp. 159–167., doi:10.1111/j.1471-6402.2004.00132.x.

victimization. Notably, FreeFrom and Verizon Wireless have sponsored programs to support survivors in becoming entrepreneurs.

FreeFrom's pilot programs in 2017 included nearly 30 women in Los Angeles, San Francisco, and Oakland.<sup>33</sup> The organization supports women in identifying a business opportunity, finding clients, setting goals, and creating all the branding materials for a new business; program participants also receive advice for managing their personal finances.<sup>34</sup> The six-month program operates at no cost to the participant, and the goal of the entrepreneur program is to help survivors of domestic violence establish financial independence to ultimately build "safe futures," as founder Sonya Passi told CNN.<sup>35</sup> Early financial results of this program are promising: nearly 90% of participants achieved a profit in their first month of operations.<sup>36</sup>

Verizon Wireless has also piloted a micro-grant model, unlike the intensive curriculum provided by FreeFrom. Verizon notes that domestic violence survivors may be better served by entrepreneurship programs over standard job-training programs because of their problem-solving skills, incentive to be independent, and prior employment history.<sup>37</sup> The entrepreneurship program model awarded a total of \$45,000 through individual grants of \$1,000 to \$5,000—the money can be used to purchase office equipment and inventory, attend a business education program, secure work space, or take care of any other expense needed to start a small business.<sup>38</sup> Verizon's program depends on partnerships with domestic violence organizations in the community: to apply for the program, applicants need to submit a business proposal as well as a

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<sup>33</sup> O'Brien, Sara Ashley. "This Startup Is Helping Domestic Abuse Survivors Launch Businesses." *CNNMoney*, Cable News Network, 27 July 2017, [money.cnn.com/2017/07/27/technology/culture/freefrom-domestic-violence-survivors/index.html](http://money.cnn.com/2017/07/27/technology/culture/freefrom-domestic-violence-survivors/index.html).

<sup>34</sup> *Ibid.*

<sup>35</sup> *Ibid.*

<sup>36</sup> *Ibid.*

<sup>37</sup> *Verizon Wireless Domestic Violence Entrepreneurship Program*, New York State Office for the Prevention of Domestic Violence, [opdv.ny.gov/help/vzwentreapplic3-11.pdf](http://opdv.ny.gov/help/vzwentreapplic3-11.pdf).

<sup>38</sup> *Ibid.*



letter from a domestic violence organization that indicates how they've participated in the program's services.<sup>39</sup>

### **Process for Incorporating and Registering a Business in North Carolina**

Across the United States, nearly 95% of businesses are “pass-through” businesses, meaning that the business income is directly taxed as the individual income of the owner(s)—this category includes sole proprietorships, partnerships, and S-corporations.<sup>40</sup> In addition, as of 2014, nearly 99% of businesses were considered small businesses, with less than \$10 million in sales and receipts.<sup>41</sup> In 2018, small businesses made up 99.6% of businesses in North Carolina and employed 44.3% of the state's workforce, indicating that growth in the small business sector will be key for adding new jobs in North Carolina.<sup>42</sup> Consequently, changes to business registration at the county level will affect the sole proprietorships and general partnerships that make up a significant portion of North Carolina's economy.

The process for incorporating a sole proprietorship or a general partnership consists of two fundamental steps: selecting the business or partnership name, and if the business is operating under an assumed name, filing a Certificate of Assumed Name.<sup>43</sup> For both a sole proprietorship and a general partnership, business owners are allowed to name the business after their full names without taking any further steps—examples on the NC.GOV website include

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<sup>39</sup> Ibid.

<sup>40</sup> Krupkin, Aaron, and Adam Looney. “9 Facts about Pass-through Businesses.” *Brookings*, Brookings, 15 May 2017, [www.brookings.edu/research/9-facts-about-pass-through-businesses/](http://www.brookings.edu/research/9-facts-about-pass-through-businesses/).

<sup>41</sup> Ibid.

<sup>42</sup> *2018 Small Business Profile: North Carolina*. U.S. Small Business Administration Office of Advocacy, 2018, [www.sba.gov/sites/default/files/advocacy/2018-Small-Business-Profiles-NC.pdf](http://www.sba.gov/sites/default/files/advocacy/2018-Small-Business-Profiles-NC.pdf).

<sup>43</sup> “Business Registration: County Filing.” *NC.gov*, [www.nc.gov/services/starting-business-nc/business-registration/business-registration-county-filing](http://www.nc.gov/services/starting-business-nc/business-registration/business-registration-county-filing).

Jane Smith Landscaping or John Jackson and Mike Mason Handyman.<sup>44</sup> A business name that is not based on the owners' full names is an "assumed name," meaning that the owners will have to file the name with the County Register of Deeds, if there is not already someone conducting business under that name.<sup>45</sup> The assumed business name certificate asks for the assumed business name, the real name of the owner(s), a street address for the business that is not a PO box, and an additional mailing address.<sup>46</sup>

Once the sole proprietorship or general partnership has been officially incorporated, filings will be available in a public-facing database listing all North Carolina business entities—the database is officially managed by the North Carolina Secretary of State.<sup>47</sup> Anyone visiting the website can search the database by Assumed Business Name, which can search for an assumed name or an owner's name through an undefined time period across all North Carolina counties.<sup>48</sup> For example, when searching for the name "Mary Smith," three business are shown in the database—Brooks & Annie, Elegant Boutique, and Mary's Magic—and for each business, there is an option to view the "Initial Filing," which contains full names of business owners and the street and mailing addresses for the business.

### **Privacy Concerns and Implications for Victims of Domestic Violence**

The move to put public records online poses a risk to domestic violence survivors who operate their own small businesses. The Certificate of Assumed Name requires a business address that is

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<sup>44</sup> "Choosing a Business Name." *NC.gov*, [www.nc.gov/services/starting-business-nc/business-registration/choosing-business-name](http://www.nc.gov/services/starting-business-nc/business-registration/choosing-business-name).

<sup>45</sup> *Ibid.*

<sup>46</sup> *Assumed Business Name Certificate (NCGS §66-71.5)*. 2017, [edpnc.com/wp-content/uploads/2017/12/A-NEW-AssumedBusNameCert-final-10.03.17corrected.pdf](http://edpnc.com/wp-content/uploads/2017/12/A-NEW-AssumedBusNameCert-final-10.03.17corrected.pdf).

<sup>47</sup> "Business Registration Search." *NC Secretary of State*, [www.sosnc.gov/online\\_services/search/by\\_title/\\_Business\\_Registration](http://www.sosnc.gov/online_services/search/by_title/_Business_Registration).

<sup>48</sup> "Assumed Business Name Search." *NC Secretary of State*, [www.sosnc.gov/online\\_services/assumed\\_name/search/id](http://www.sosnc.gov/online_services/assumed_name/search/id).

not a P.O. box—for survivors who are planning to operate businesses out of their homes (such as catering, graphic design, and independent e-commerce craft shops), submitting this address may prove to be a barrier to entry, because their personal addresses will be easily searchable in the public-facing database. If survivors hope to incorporate a business without disclosing their personal address in the database, they must purchase office space for the business to have its own address. Office space costs, at an average of just over \$26 per square foot in the Triangle’s real estate market and upwards of \$30 per square foot in central Durham, may be prohibitive for new entrepreneurs.<sup>49</sup> Fear of disclosing a home address is a barrier to incorporating a business, and that would have rippling consequences for earning potential and business results. In 2016, the median income for self-employed individuals at incorporated businesses was \$43,867, and for unincorporated businesses, the median income was less than half of that, at \$21,134.<sup>50</sup>

Jessica Tunon, a D.C. resident and local business owner, found herself constantly having to relive her experience being stalked by an ex-boyfriend; even after filing a civil protection order, she was constantly worried about the public information he could find online.<sup>51</sup> As a registered voter and business owner, her home address was easily accessible through public databases online—when she tried to remove that address from public records, she found that there was no process in D.C. for victims to prevent their home addresses from being publicly available.<sup>52</sup> She had to contact each government agency that published address information and

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<sup>49</sup> Graham, Ben. “How Class A Office Rates Are Evolving in the Triangle.” *Bizjournals.com*, 7 Nov. 2018, [www.bizjournals.com/triangle/news/2018/11/07/how-class-a-office-rates-are-evolving-in-the.html](http://www.bizjournals.com/triangle/news/2018/11/07/how-class-a-office-rates-are-evolving-in-the.html).

<sup>50</sup> *2018 Small Business Profile: North Carolina*. U.S. Small Business Administration Office of Advocacy, 2018, [www.sba.gov/sites/default/files/advocacy/2018-Small-Business-Profiles-NC.pdf](http://www.sba.gov/sites/default/files/advocacy/2018-Small-Business-Profiles-NC.pdf).

<sup>51</sup> Schmidt, Samantha. “Victims of Violence, Abuse Will Soon Have Help Keeping Their Addresses Private in D.C.” *The Washington Post*, WP Company, 5 Aug. 2019, [www.washingtonpost.com/local/social-issues/victims-of-violence-abuse-will-soon-have-help-keeping-their-addresses-private-in-dc/2019/08/05/50bcbbda-b566-11e9-8f6c-7828e68cb15f\\_story.html](http://www.washingtonpost.com/local/social-issues/victims-of-violence-abuse-will-soon-have-help-keeping-their-addresses-private-in-dc/2019/08/05/50bcbbda-b566-11e9-8f6c-7828e68cb15f_story.html).

<sup>52</sup> *Ibid.*

submit costly individual requests to change her home address to a P.O. box.<sup>53</sup> Since going through the experience of having to monitor web searches for her address, Tunon has advocated for protections for victims of domestic violence and stalking, and D.C. has recently begun a new Address Confidentiality Program.<sup>54</sup>

The North Carolina Department of Justice currently operates an Address Confidentiality Program (ACP) for nearly a thousand survivors—the Attorney General’s office will choose a substitute address and continue to forward first-class mail to survivors while keeping that new address secret.<sup>55</sup> The ACP requires that survivors move to a new address and sign a statement attesting to fear for their safety—these requirements constrain the pool of survivors who are eligible for the substitute address.<sup>56</sup> The program’s website notes that survivors may use this substitute address for voter registration, a driver’s license, or utility bills. However, private companies are not required to accept the ACP substitute address, and public records will still contain the addresses of people who own a house or land.<sup>57</sup> These public records act as a documented chain of ownership that is available to the public—having a publicly-available history of a property prevents fraud, such as individuals impersonating the owner of the home to sell a property.<sup>58</sup> The substitute address also cannot be used on business filings that become part of the public record and are placed on public-facing databases. Ultimately, this means that survivors of domestic violence must choose between incorporating their businesses and protecting their home address information.

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<sup>53</sup> Ibid.

<sup>54</sup> Ibid.

<sup>55</sup> “Address Confidentiality Program.” *NC DOJ*, North Carolina Department of Justice, [ncdoj.gov/public-protection/address-confidentiality-program/](https://ncdoj.gov/public-protection/address-confidentiality-program/).

<sup>56</sup> Ibid.

<sup>57</sup> Ibid.

<sup>58</sup> “What Is ‘Recording’ When Closing on a Home Purchase?” *Mortgage Rates, Mortgage News and Strategy: The Mortgage Reports*, 17 Sept. 2019, [themortgagereports.com/37838/closing-real-estate-recording-fees](https://themortgagereports.com/37838/closing-real-estate-recording-fees).

## Policy Recommendations

### **1. Expand the Address Confidentiality Program through the North Carolina Department of Justice to apply to legal filings, including all business filings at the state and county levels. Both private companies and state agencies should be required to honor these substitute addresses for all forms of mail.**

The Address Confidentiality Program does not shield survivors' addresses from business registration records. With the support of the North Carolina state legislature, the Address Confidentiality Program should be expanded so that the substitute address can be used for legal filings related business incorporation and registration. In the context of business filings, an address is needed to open bank accounts, open accounts with suppliers and vendors, receive financial and legal documents, and registering a domain name.<sup>59</sup> Specifically, customers or any other dissatisfied parties need to have a business address in case they need to file a lawsuit—the Attorney General's office should only reveal the survivor's secret address for legal proceedings, and in that cases, it should be redacted from all publicly available documentation so that the survivor's address is only disclosed when necessary.

As the program exists now, only first-class mail can be sent to the substitute address, meaning individuals using the substitute address are unable to receive the same privacy protection if they are shipping packages or sending other forms of mail.<sup>60</sup> This is especially concerning, given that e-commerce developments may result in a substantial volume of mail that is not considered first-class mail and consequently is not protected by the ACP. Morgan Stanley estimates that by 2022, Amazon, UPS, and FedEx will have a combined 14.4 billion package

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<sup>59</sup> "Why You Need a Business Address for Your LLC or Corporation." *VirtualPostMail*, [www.virtualpostmail.com/blog/why-you-need-a-business-address-for-your-llc-or-corporation](http://www.virtualpostmail.com/blog/why-you-need-a-business-address-for-your-llc-or-corporation).

<sup>60</sup> "Address Confidentiality Program." *NC DOJ*, North Carolina Department of Justice, [ncdoj.gov/public-protection/address-confidentiality-program/](http://ncdoj.gov/public-protection/address-confidentiality-program/).

volume at that time.<sup>61</sup> Receiving those packages would require survivors to give up their secret address, and would create a vulnerability point that can be ultimately exploited by data brokers and abusers. Furthermore, survivors who are starting their own businesses may explore e-commerce as a way to reach a wider audience—for example, Etsy’s platform for creative entrepreneurship boasted 2.7 million active sellers and 46.4 active buyers—and would need to use a substitute address for shipping and processing returns.<sup>62</sup>

Once the ACP has been expanded to cover all forms of mail and packages, private companies should also be required to accept these substitute addresses, unless they successfully petition the North Carolina Department of Justice to be excluded from this requirement. While private companies may not maintain a public database of addresses in the way that public records databases do, the threat of data breaches at private companies poses a substantial risk to survivors’ privacy. In an example specific to small business owners, Bank of America disclosed a breach in the Paycheck Protection Program (PPP) application platform—possibly compromised information included tax ID numbers, addresses, and business owners’ personal information (including name, address, SSN, phone numbers, etc.).<sup>63</sup> The breach occurred on April 22 and highlights how an individual using a substitute address through the ACP may have their secret address compromised if the private company does not accept the substitute address. In the case of an extenuating circumstance that prevents the use of a substitute address, the company should petition the Department of Justice to be excluded from this requirement. However, even if the

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<sup>61</sup> Cheng, Andria. “Amazon Ships 2.5 Billion Packages A Year, With Billions More Coming, In A Major Threat To UPS And FedEx.” *Forbes*, Forbes Magazine, 13 Dec. 2019, [www.forbes.com/sites/andriacheng/2019/12/12/how-serious-is-amazons-threat-to-ups-fedex-study-finds-it-could-soon-beat-them-in-us-package-delivery-volume/#375090e868f4](http://www.forbes.com/sites/andriacheng/2019/12/12/how-serious-is-amazons-threat-to-ups-fedex-study-finds-it-could-soon-beat-them-in-us-package-delivery-volume/#375090e868f4).

<sup>62</sup> “2019 Integrated Annual Report.” *Etsy, Inc. - Investor Relations*, Etsy, [s22.q4cdn.com/941741262/files/doc\\_financials/annual/2019/Etsy-Annual-Report.pdf](https://s22.q4cdn.com/941741262/files/doc_financials/annual/2019/Etsy-Annual-Report.pdf).

<sup>63</sup> Hudson, Caroline. “Bank of America Reveals Data Breach in PPP Application Process.” *Bizjournals.com*, Charlotte Business Journal, 27 May 2020, [www.bizjournals.com/boston/news/2020/05/27/bank-of-america-discloses-ppp-data-breach.html](http://www.bizjournals.com/boston/news/2020/05/27/bank-of-america-discloses-ppp-data-breach.html).

company is exempted, following best practices set forth by Pennsylvania’s ACP, such as password protecting the account, confidentially flagging the account for review by special services, and using the substitute address on any mail, should be encouraged.<sup>64</sup>

The ACP also needs to be expanded so that more survivors are able to qualify for the program—currently, the program requires that survivors move be in the process of moving to a new address.<sup>65</sup> This standard should be modified to allow all survivors who are living apart from their abuser to qualify for the program, with a set of “temporary substitute addresses” that can be provided for survivors who do not have the means to move to a different address—these temporary substitute addresses should be stored separately and be created in a different pattern from the long-term substitute addresses that the program focuses on. Even if survivors have already been living at their current address, this temporary substitute address, which would be slated to expire within 6-12 months would allow survivors to protect their privacy in future mail and new subscriptions that may be required when starting a new business. Expanding who qualifies for the program would empower survivors who cannot afford to move but anticipate that they will need to start sharing their address more widely—in the case of opening a business, this could include opening new accounts and subscriptions for the business.

**2. Direct the North Carolina Secretary of State to redact business and mailing addresses for sole proprietorships and partnerships that are posted in any public-facing database, and offer all business owners the option to list a P.O. box in lieu of a residential address if the business will be operated from home.**

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<sup>64</sup> “For Private Companies.” *Pennsylvania Office of Victim Advocate*, Pennsylvania Office of Victim Advocate, [www.o.va.pa.gov/RestorativeJustice/AddressConfidentialityProgram/Pages/For-Private-Companies.aspx](http://www.o.va.pa.gov/RestorativeJustice/AddressConfidentialityProgram/Pages/For-Private-Companies.aspx).

<sup>65</sup> “Address Confidentiality Program.” *NC DOJ*, North Carolina Department of Justice, [ncdoj.gov/public-protection/address-confidentiality-program/](http://ncdoj.gov/public-protection/address-confidentiality-program/).

Not all survivors will qualify for the Address Confidentiality Program, and even if they qualify, some survivors of domestic violence may prefer to not go through the program because they would like to avoid the hassle of having both a substitute address through the Attorney General's office and a secret home address. Moreover, people who are not survivors of domestic violence may also have a compelling interest in keeping their address private—people who live alone at their address or are at risk of stalking or human trafficking, among others. These individuals may also be well-served by keeping their addresses private from business registration databases, so that those addresses are obscured from the view of other individuals and companies scraping data for their people search products.

As a precaution for all small business owners incorporating in North Carolina, all business and mailing addresses for sole proprietorships and general partnerships should be redacted from the public-facing database hosted by the North Carolina Secretary of State's office. Following this recommendation, the North Carolina Secretary of State's office would need to develop an address request process in which individuals with a compelling need—in the case of a lawsuit or investigation, for example—would be able to request and receive the appropriate address for their need. In addition, for any business owner who operates a business from home, a P.O. box should be accepted in lieu of any residential addresses—however, the business owner should ultimately be held responsible for any financial and legal notices sent to that P.O. box. A publicly available mailing address that allows the use of a P.O. box in the place of a residential address will still satisfy the need for an address that a customer, supplier, vendor, or regulator can reach in the case of a complaint or a lawsuit. This change to the public-facing database and business filing requirements would preserve the privacy of small business owners.



**3. Task the North Carolina Domestic Violence Commission with creating a confidential micro-grant program designed for survivors of domestic violence that will be allocated with the support of local organizations for survivors.**

Survivors of domestic violence have a heightened need for privacy when it comes to building their business—traditional methods of securing capital may not be feasible for survivors of domestic violence, especially given widespread economic abuse that may have negative ramifications on their credit scores. In addition, female entrepreneurs face additional obstacles in accessing capital and contracts—as of 2018, the average loan for female-owned businesses was \$57,097, whereas for male business owners, the average loan size is \$103,604.<sup>66</sup> Lending disparities that affect women and minorities, compounded with the devastating consequences of economic abuse, present a barrier for survivors of domestic violence to access capital.

North Carolina has several grant and loan programs for small businesses, but none of the programs publicly listed are specifically designed for survivors of domestic violence.<sup>67</sup> To bridge this gap in access to capital, the North Carolina Domestic Violence Commission should create a confidential micro-grant program that will allow survivors of domestic violence to access capital needed to start a business. The closest program that emulates this microgrant program is the Verizon Wireless Domestic Violence Entrepreneurship Program, which allocated \$45,000 in the form of \$1,000-\$5,000 grants to survivors who submit a business plan and a letter of support from a community organization designed for victims of domestic violence.<sup>68</sup> As with the Verizon program, the grants should be specifically allocated for start-up costs related to a small business:

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<sup>66</sup> Arora, Rohit. “The Lending Gap Narrows for Women Business Owners, but It’s Still 31% Less than for Men.” *CNBC*, CNBC, 7 Mar. 2019, [www.cnbc.com/2019/03/07/the-lending-gap-narrows-for-women-business-owners-nationwide.html](http://www.cnbc.com/2019/03/07/the-lending-gap-narrows-for-women-business-owners-nationwide.html).

<sup>67</sup> “Small Business Resources.” *Economic Development Partnership of North Carolina*, Economic Development Partnership of North Carolina, [edpnc.com/start-or-grow-a-business/start-a-business/small-business-resources/](http://edpnc.com/start-or-grow-a-business/start-a-business/small-business-resources/).

<sup>68</sup> *Verizon Wireless Domestic Violence Entrepreneurship Program*, New York State Office for the Prevention of Domestic Violence, [opdv.ny.gov/help/vzwentreapplic3-11.pdf](http://opdv.ny.gov/help/vzwentreapplic3-11.pdf).

office space, computers and other equipment, initial inventory, business education, or as collateral for more credit from a bank or a supplier.<sup>69</sup>

The North Carolina Domestic Violence Commission falls within the Department of Administration, under the Council for Women and Youth Involvement. In the North Carolina state budget for Fiscal Year 2020, the three programs focused on domestic violence at the state level through the Department of Administration—identified in the budget as the Domestic Violence Center (1782), Domestic Violence Program (1781), NC Council for Women and Domestic Violence Commission (1731)—collectively spent \$9.3M.<sup>70</sup> Emulating the Verizon Wireless program, this micro-grant program should provide startup capital grants ranging from \$1000 to \$5000, through partnerships with local organizations that will refer candidates for the micro-grant program. The three programs mentioned above were expected to receive \$10M for all expenditures in Fiscal Year 2020, according to the adjusted budget numbers.<sup>71</sup> The legislature should increase this amount by 4% (\$400,000) so that the program can provide grants for up to 400 survivors of domestic violence. Subsequent years' allocation should be based on the previous year's rate of participation, with a minimum allocated funding of \$100,000 each year that the program continues to be active.

The North Carolina Domestic Violence Commission should be tasked with managing this micro-grant program, since the grants can provide an additional benefit for women entrepreneurs who face a disadvantage when trying to secure capital for their businesses, although grants should be accessible to all victims of domestic violence, regardless of gender. In addition, as a

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<sup>69</sup> Ibid.

<sup>70</sup> *NC Budget and Spending*, SAS Report Viewer, 2020, [https://gdacreporting.ondemand.sas.com/SASReportViewer/?reportUri=/reports/reports/b00debf3-51e7-45a6-92d4-3efaf33a3daa&page=vi416694&sso\\_guest=true&informationEnabled=false&commentsEnabled=false&alertsEnabled=false&reportViewOnly=true](https://gdacreporting.ondemand.sas.com/SASReportViewer/?reportUri=/reports/reports/b00debf3-51e7-45a6-92d4-3efaf33a3daa&page=vi416694&sso_guest=true&informationEnabled=false&commentsEnabled=false&alertsEnabled=false&reportViewOnly=true).

<sup>71</sup> Ibid.

state agency, the North Carolina Domestic Violence Commission is expected to already have a system in place to accept substitute addresses from the Address Confidentiality Program in a way that traditional banks and other lenders may not. Regardless of whether the grant applicants are actively participating in the Address Confidentiality Program, the North Carolina Domestic Violence Commission should take reasonable efforts to anonymize the identity of applicants and program participants throughout their involvement with the micro-grant program. However, for accountability purposes, the North Carolina Domestic Violence Commission should provide aggregate information specific to the program's operations, such as application and acceptance results and program outcomes, which may relate to survivors' level of economic independence and feelings of self-worth and confidence, among others.

### **Conclusion**

Data brokers consolidate and sell information to any interested buyer, often without any screening to safeguard against malicious use. "People search products" are their own category of data offerings—these easily searchable profiles contain deeply personal information and often source data from public records. These search products pose a fundamental risk to survivors, who take laborious efforts to hide their personal information due to stalking concerns. People search products can substantially impair survivors' ability to escape their abusers and may lead to continued traumatization, compounding on the health effects of ongoing physical and emotional trauma caused by the abuser.

Survivors of domestic violence also often experience the long-term effects of economic abuse, which can lead to a loss of future earning potential and limited access to capital. Entrepreneurship is a promising avenue for survivors to rebuild their self-esteem and build a

stable, independent source of income. However, survivors who start businesses from home face a key privacy barrier when they register their businesses with the state. Entrepreneurs in North Carolina are required to list business and mailing addresses on registration filings—entrepreneurs working from home will then have their residential address on the public-facing business registration database, a target for data brokers building out people search products.

Resolving this privacy issue will involve expanding the jurisdiction and qualifications for the Address Confidentiality Program, redacting addresses in the public-facing business registration database, and developing a confidential micro-grant program to increase access to capital. This three-pronged approach will support survivors as budding entrepreneurs without compromising the privacy that they rely on to ensure their safety.

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