

From: [Eric Meer](#)
To: [Public Comment SB22034](#)
Subject: [EXTERNAL] SB22034 Suggestion - Data Requests
Date: Wednesday, August 31, 2022 5:02:31 PM

Hello,

I participated in the Webinar today (8/31) and would like to recommend that this research committee consider carefully examining the Data requests sold by the S.O.S. (see link below) as a possible avenue for fraudulent activity. I understand this information must be made available to the public, but by selling thousands and thousands of records to whomever is willing to pay the fees, the S.O.S. is effectively handing these companies a plethora of easily utilized (and thus distributable) data points that would be unreasonable to mine manually (put yourself in the place of the fraudster and imagine trying to randomly mine information for thousands of businesses you don't know exist from individual PDFs). However, for a few thousand dollars, the S.O.S. will gladly hand this information over to whomever requests it (here is the form the fraudster would complete: <https://www.coloradosos.gov/pubs/business/PDFFillable/BusinessMasterFile.pdf>).

It's difficult to imagine a legitimate usage of such a massive database that has any benefit whatsoever to business owners (my wife and I have four business entities filed with the S.O.S.). So why do these lists exist? Why are they being sold? And is there a secondary black market for this information to be resold?

The person living in Florida who commented after me mentioned receiving suspicious-looking offers in the mail for a company posing as an official entity to file his annual report. We too have received these types of "offers" on three separate occasions. They want \$125 to file a \$10 report. It seems highly probable these companies (at least one of which was based out of an unverifiable address in Las Vegas) are creating mailers to Colorado companies after having purchased the Data from the Sec of State's Office (again, mining such manually would be prohibitively expensive and time consuming).

As it relates to SB22-034, it's easy to imagine this information being resold to fraudsters as well.

I'm hopeful the committee will consider obtaining details about the companies purchasing these Data lists AND, again, why these lists are produced and sold in the first place. As a business owner, I don't believe there's any value whatsoever in these lists. Additionally, business owners DO NOT have the option of having our information removed from these lists. (Again, I realize the information needs to remain public, but businesses should have the option of opting out of database lists being sold, and we currently do not).

I would be happy to engage in a dialog around this and offer further suggestions and information that may be helpful in combatting the fraud SB22-034 is aiming to prevent.

Thank you for your time and consideration!

Eric Meer



P.S. Here is the S.O.S. link for available Data requests for purchase: https://www.coloradosos.gov/pubs/business/forms_main.html#DataRequests