

THE ECONOMIC COSTS OF CIPA LITIGATION

A REPORT BY OXFORD ECONOMICS



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EXECUTIVE SUMMARY

The California Invasion of Privacy Act (CIPA) is a California statute enacted in 1967 that restricts the interception of communications by third parties and authorizes a private right of action with statutory damages of \$5,000 per violation. In recent years, CIPA has increasingly been applied to routine interactions with modern websites and mobile applications (apps), where users’ browsers and devices transmit data to multiple recipients as webpages and apps load and function. Since about 2020, this has resulted in a rapidly expanding wave of CIPA web- and app-based privacy litigation directed at a wide range of businesses and organizations.

LITIGATION ACTIVITY AND COSTS

Based on the best available data from Fisher Phillips, more than 4,000 CIPA web- and app-based privacy lawsuits have been filed to date, with the rate of filings continuing to accelerate. Despite this volume, no cases have yet produced a final judgment with damages at trial, meaning there’s little judicial guidance on how CIPA liability—which, at \$5,000 per violation, is fundamentally unbounded—will ultimately be determined. This legal uncertainty creates strong incentives for defendants to settle in the face of potentially extreme outcomes. **This report has identified nine public class-action settlements in CIPA web- and app-related privacy cases, with settlement amounts ranging from \$400,000 to \$60 million per case and totaling over \$150 million, or \$17 million on average per case.** Due to the concentration of larger, publicly reported class actions, these settlement amounts are unlikely to be representative of the broader population of cases, and therefore provide only limited guidance on likely outcomes.



public class-action settlements in CIPA web- and app-related privacy cases



with settlement amounts ranging from:

\$400,000 to \$60 million



In addition to any payments to plaintiffs, CIPA defendants incur significant legal defense costs regardless of outcome. **Based on a simplified framework reflecting how cases progress through litigation, this report estimated total defense costs for cases filed to date to be on the order of \$600 million, although not all of these costs have yet been fully realized.** Including litigation-related expenses incurred by plaintiffs and the court system increases this figure to roughly \$850 million.

Alongside filed cases, CIPA enforcement has relied heavily on demand letters sent directly to website operators seeking quick, lower-value settlements. Drawing on interviews with subject matter experts, this report found that the typical demand letter settles for damages of around \$10,000, with total costs to targeted firms—including legal fees, remediation, and time costs—of around \$30,000. Interviewees estimated approximately 10 demand letters for each case filed, suggesting approximately 40,000 demand letters to date. **On this basis, the cumulative costs associated with CIPA demand letters to date are estimated to be around \$1.2 billion.** Other sources have estimated as many as 100,000 CIPA demand letters to date, which would imply costs as high as \$3 billion.

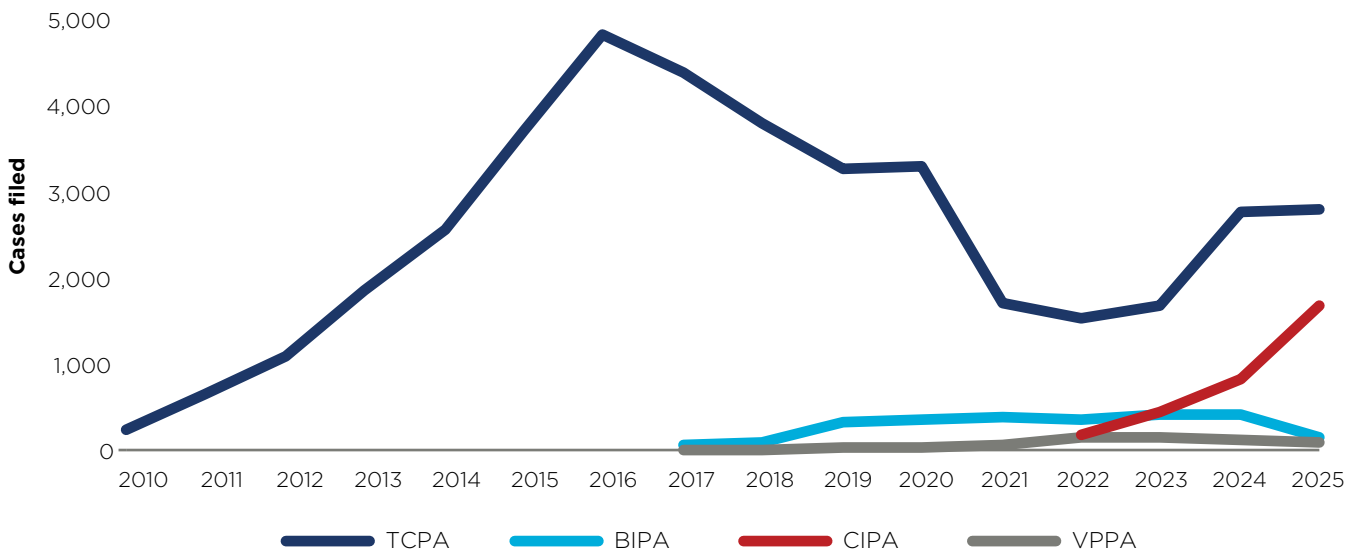
The potential scale of exposure to CIPA litigation is large. **This report estimates that close to 1 million US entities—and approximately 120,000 with a physical presence in California—are potentially exposed to CIPA litigation based on their size, industry, and likelihood of using web- or app-based technologies implicated in these claims.** While it is unlikely that the bulk of these entities will face CIPA litigation—particularly as awareness spreads and firms take steps to reduce exposure—the size of this potentially affected population underscores the potential scale that CIPA web- and app-based privacy litigation could reach.

LESSONS FROM COMPARABLE LITIGATION WAVES

To place CIPA in context, the report examined litigation waves under other statutory damages regimes that were applied to new technologies in ways not originally anticipated. A common feature of these cases is that the underlying technologies allow plaintiffs to identify and pursue large numbers of similar claims at relatively low cost, enabling litigation

activity to scale rapidly. As a result, filings can grow quickly and remain elevated for extended periods. Experience under statutes such as the TCPA shows that even after initial growth slows, litigation activity can persist at high levels for many years, generating substantial cumulative costs over time.

Fig. 1: Cases filed per year under four statutes, 2010–2025



Source: WeRecon (CIPA), Duane Morris (BIPA and VPPA), Fisher Phillips (CIPA), Oxford Economics

BROADER ECONOMIC IMPLICATIONS

In addition to the litigation costs described above, continued CIPA uncertainty affects how websites and related digital technologies are designed and operated. In the absence of clear guidance on compliance, firms may respond by removing third-party tools, impairing website and app functionality, or by implementing consent-based approaches that can be complex to deploy and often fail to provide clear assurance of compliance. These responses impose costs and divert resources away from other productive uses.

These considerations are especially relevant in digital advertising, an industry accounting for roughly \$300 billion in annual US spending, where tracking and measurement technologies play a central role in targeting efficiency and campaign evaluation. Economic theory predicts, and empirical evidence supports, that restrictions on these tools raise customer acquisition costs, increase consumer prices, and disproportionately affect smaller businesses that rely more heavily on targeted advertising.



SECTION 1: INTRODUCTION



The California Invasion of Privacy Act (CIPA) is a California state law passed in 1967 that, among other things, regulates the interception of electronic communications by third parties. Although part of the California Penal Code, CIPA authorizes a private right of action with statutory damages of \$5,000 per violation, allowing individuals to sue those they allege have violated their privacy rights under CIPA without having to prove actual harm.

In recent years, CIPA, through its private enforcement provisions, has increasingly been applied to routine interactions with modern web- and app-based services, where users' browsers or devices transmit data to multiple recipients as webpages load and function. Since 2020, over 4,000 such CIPA website lawsuits have been filed. Additionally, far larger numbers of demand letters, which seek quick and relatively modest payouts designed to be cheaper than contesting the claims in court, have been sent directly to businesses, particularly smaller organizations with limited legal resources.

Courts have reached conflicting conclusions regarding CIPA's applicability to the modern web, and there appears to be little reason to expect that the judiciary will settle these questions quickly. This legal uncertainty feeds technological uncertainty, as website owners and designers receive little clear guidance regarding what constitutes CIPA compliance. When coupled with CIPA's effectively uncapped statutory damages, this uncertainty also creates strong incentives for defendants to settle cases rather than bear the costs and risks of protracted litigation.

This legal uncertainty is unsurprising given the application of a decades-old law to the architecture of the modern internet. It also stands in contrast to California's more recent privacy legislation—the California Consumer Privacy Act (CCPA) of 2018 and its 2020 amendment through the California Privacy Rights Act (CPRA)—which were drafted with contemporary internet business models and data practices in mind.

This report was commissioned by Reform CIPA, a coalition advocating for modernization of California's 1967 Invasion of Privacy Act.¹ It seeks to assess the economic dimensions of the CIPA website litigation wave.

Section 2 documents the scale of CIPA enforcement activity, including both filed cases and demand letters, and estimates the costs associated with each. It also assesses the size of the universe of entities potentially exposed to CIPA liability. Section 3 examines several comparable litigation waves under other statutory-damages regimes to identify patterns relevant to the likely trajectory of CIPA. Section 4 considers how ongoing CIPA litigation and legal uncertainty may affect the use of web technologies. Section 5 concludes.

¹ Reform CIPA. [Reform CIPA: Coalition to Modernize the California Invasion of Privacy Act](#).

SECTION 2: THE CIPA LITIGATION WAVE

2.1 FILED CIPA CASES

Web- and app-related CIPA litigation appears to have begun with approximately 80 cases filed in California, and in Florida under the similar Florida Security of Communications Act (FSCA), in 2020–2021. These early cases primarily concerned session-replay software, which records users' mouse and keyboard actions and is commonly used to improve website design and performance. Most of these early CIPA website cases were ultimately dismissed.²

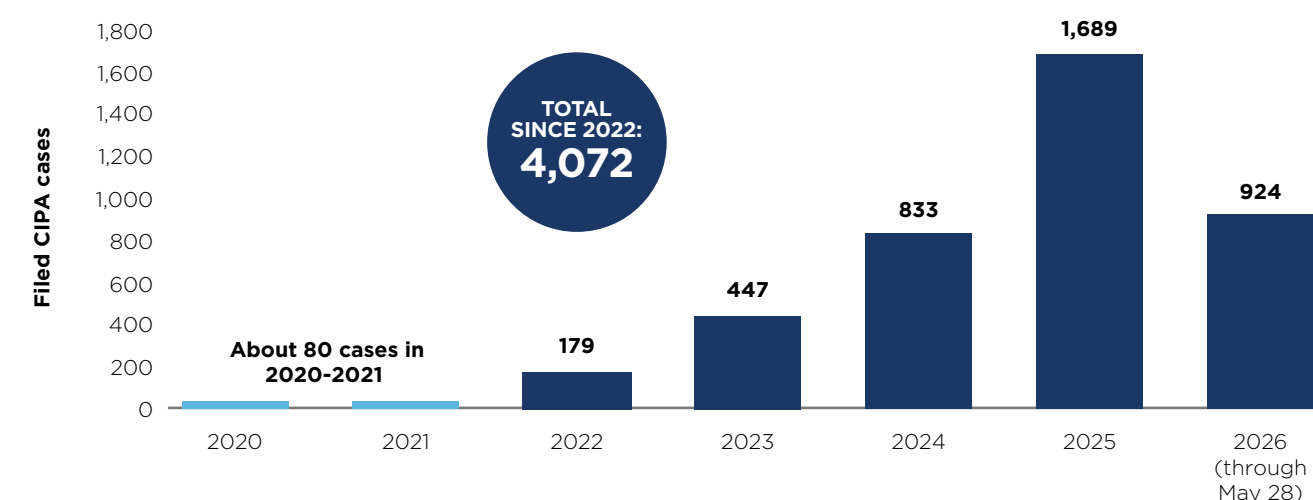
Building on this early activity, filings accelerated rapidly in the early 2020s, with a sharp increase in new CIPA cases observed from 2022 onward. These filings have considered a variety of legal theories referencing different CIPA provisions focused on a few different website technologies, the particulars of which are beyond the scope of this economic analysis.

To quantify the magnitude of this litigation wave, we rely on case-level data compiled by the law firm Fisher Phillips.³ This dataset captures web and app-based privacy lawsuits filed in state and federal courts nationwide and provides the clearest available

view of the portion of CIPA-related enforcement activity that reaches litigation. Although the dataset includes a small number of cases brought under other state wiretapping statutes, such as FSCA, filtering out non-California state-court filings yields a dataset composed primarily of CIPA cases.

According to the filtered Fisher Phillips data, 4,072 website-privacy cases were filed in federal and in California state courts between the start of 2022 and May 28, 2026, the large majority of which arise under CIPA. The growth in CIPA filings over this period has been extraordinary. Annual filings increased from 179 cases in 2022 to 1,689 in 2025, representing a compound annual growth rate (CAGR) of roughly 111%. Filings more than doubled from 2022 to 2023, nearly doubled again from 2023 to 2024, and then doubled once more in 2025. Early 2026 data show continued momentum: annual filings through May 28 increased from 628 in 2025 to 924 in 2026, indicating that the litigation wave has not yet crested.

Fig. 2: CIPA cases filed per year, 2022–2026Q1



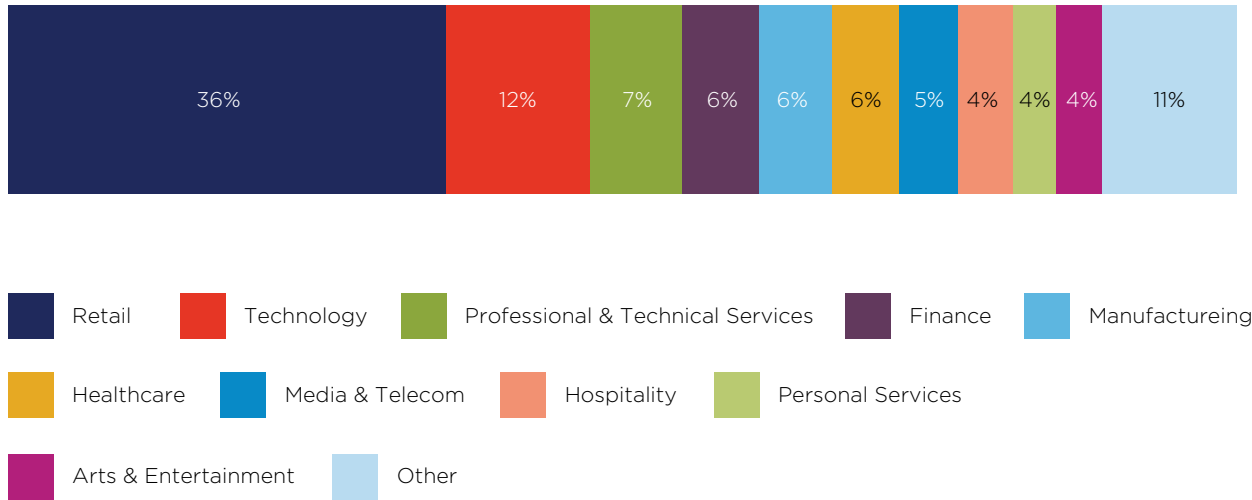
Source: Fisher Phillips, Morrison & Foerster, Oxford Economics

² Morrison & Foerster LLP, "Privacy Litigation 2021 Year in Review: Web Analytics 'Session Replay' Wiretap Litigation," January 13, 2022.

³ Fisher Phillips LLP, Wiretapping Litigation Map. The authors also relied on a richer underlying dataset provided directly by Fisher Phillips.

Breaking out these filed cases⁴ by the defendant’s industry (Figure 3) reveals that retail firms accounted for 36% of all filings, by far the largest share, followed by technology (12%), professional and technical services (7%), and finance and insurance, manufacturing, and healthcare (6% each). This distribution shows that CIPA litigation is concentrated in consumer-facing and service-oriented sectors with substantial website traffic and widespread use of third-party tools.

Fig. 3: CIPA cases filed by industry

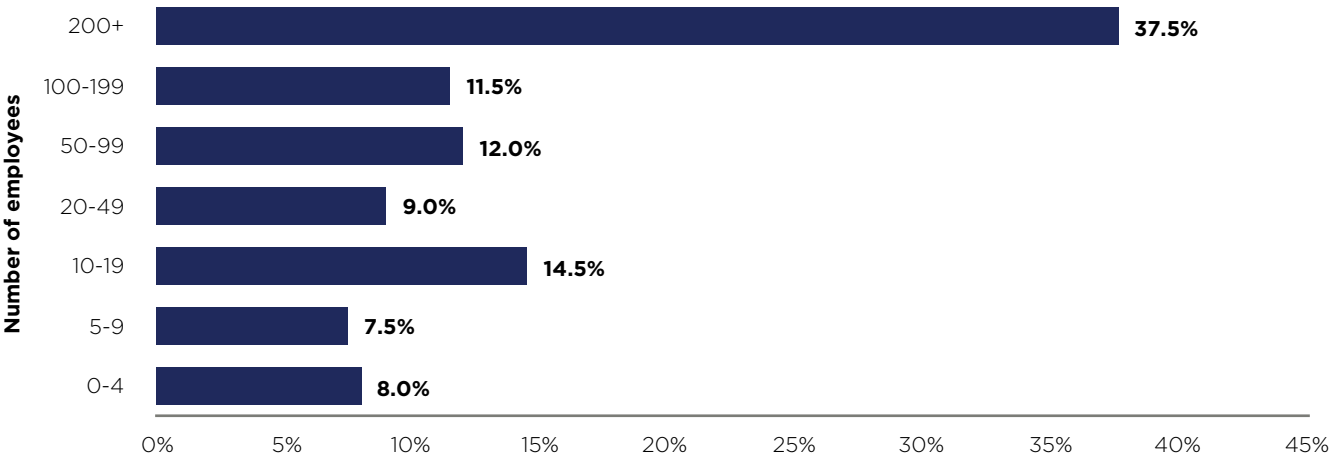


Note: Totals may not add due to independent rounding
Source: Fisher Phillips, Oxford Economics

Breaking down the filed cases by firm size reveals that firms with more than 200 employees were the targets in 38% of the cases filed, indicating that the bulk of cases are filed against larger defendants.

However, half of CIPA lawsuit defendants had fewer than 100 employees, while 16% had fewer than 10 employees.

Fig. 4: Filed CIPA cases by size of defendant⁵

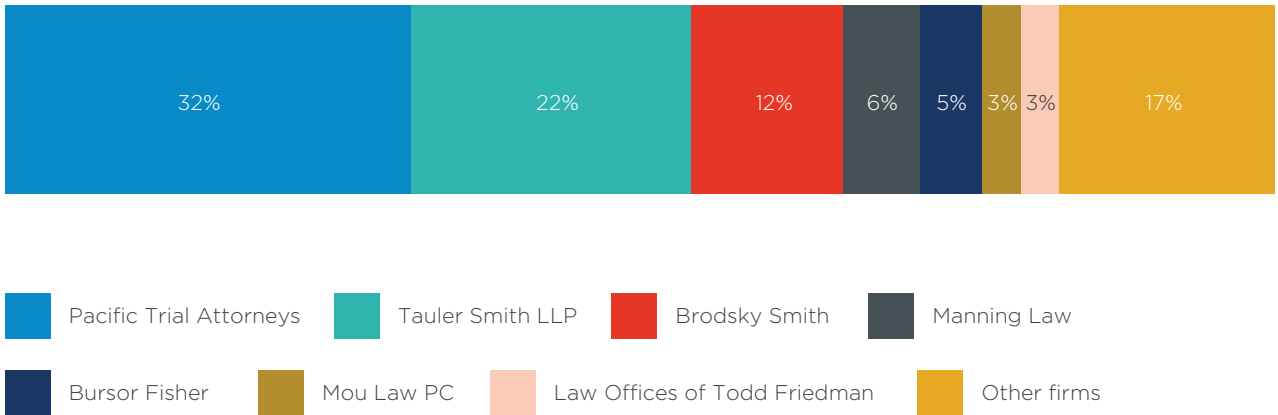


Source: Fisher Phillips, Oxford Economics

CIPA filings are highly concentrated among a small group of plaintiff firms. Focusing on cases filed in California state and federal courts, which represent

3,219 of the 3,545 total cases (91%), seven plaintiff firms have been responsible for over 80% of the cases filed in the Fisher Phillips data.

Fig. 5: Plaintiffs of CIPA cases filed in California



Source: Fisher Phillips, Oxford Economics

Finally, the case summaries in the Fisher Phillips data (a short summary scraped from court records) describe 40% of filed cases as class actions. This

represents a floor on the number of cases filed as putative class actions, as plaintiffs in many of the remaining 60% of cases may also seek class status.

⁴ The analysis in Figures 3–6 exclude 2026Q2 data.

⁵ This analysis used AI to estimate the size of 200 randomly selected cases in the filtered Fisher Phillips dataset.

2.2 OBSERVED CIPA SETTLEMENTS

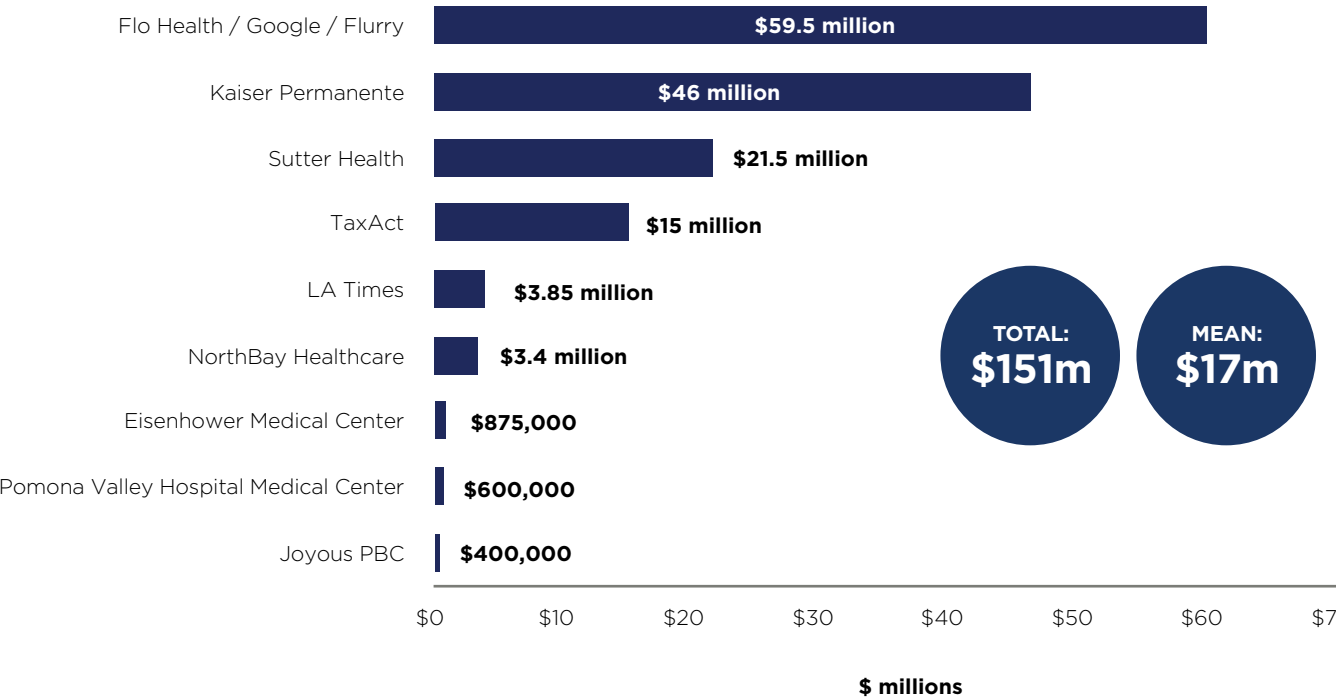
With statutory damages of \$5,000 per violation, putative classes that may encompass tens of thousands of website users, and no clear limit on the number of alleged violations per user, the theoretical liability in most CIPA cases is easily in the millions of dollars and fundamentally unbounded. To date, no CIPA web- or app-tracking case has produced a final judgment with damages at trial, and judicial guidance on how CIPA liability will ultimately be constrained remains limited, leaving parties to negotiate under continued legal uncertainty.⁶

Economic models of litigation predict that, when damages are uncapped and legal standards unsettled, settlement outcomes are driven less by expected trial results than by exposure to low-probability, high-loss outcomes. Defendants therefore rationally incorporate tail risk and defense costs into settlement decisions even when ultimate liability is uncertain. Consistent with this, empirical studies of class actions find that settlements typically represent a small share of maximum theoretical exposure, while still reflecting substantial risk premiums tied to legal uncertainty rather than expected merit alone.⁷

Against this backdrop, only a limited number of filed CIPA cases have progressed far enough to result in publicly disclosed settlements. The list of such settlements presented in figure 6 is not comprehensive of all CIPA settlements, as typically only class action settlements are publicly announced, and smaller settlements may receive limited coverage. For these reasons, the settlements reported here are likely to be somewhat biased towards the higher end of CIPA settlements generally.

Taken together, the nine settlements identified below total over \$150 million, for an average value of \$17 million per case. Settlement amounts in individual cases range from several hundred thousand dollars to tens of millions. These cases do not establish firm bounds on liability, but they provide the only concrete reference points currently available for assessing the magnitude of damages associated with serious CIPA litigation. Importantly, these values reflect settlement payments only; defense costs, which can be substantial, are considered in Section 2.3.

Fig. 6: Public CIPA settlements⁸



Source: Oxford Economics

6 One case, Frasco v. Flo Health, Inc., has proceeded further than others. A jury returned a verdict on liability against one defendant (Meta), but no final damages award has yet been determined. The litigation has also produced settlements across three defendants totaling \$59.5 million, which are consolidated into a single observation in Figure 6. “[Jury Finds Meta Violated California Privacy Law by Collecting Flo App Users’ Sensitive Data](#),” HIPAA Journal, August 6, 2025.

7 Kathryn E. Spier, Litigation, in Handbook of Law and Economics (A. Mitchell Polinsky & Steven Shavell eds., 2007).

8 Flo Health / Google / Flurry: “[Flo Health, Google, and Flurry Reach \\$59.5 Million Settlement in Privacy Lawsuit](#),” HIPAA Journal, 2025. Kaiser Permanente: “[Kaiser Permanente Settles CIPA Lawsuit](#),” Privado AI Privacy Corner Newsletter, January 22, 2026. Sutter Health: “[\\$21.5M Sutter Health Settlement Ends Class Action Lawsuit Over Alleged Patient Info Sharing with Google, Facebook](#),” ClassAction.org, December 5, 2025. TaxAct: “[TaxAct Reaches Multimillion-Dollar Settlement Over Data Sharing Allegations](#),” Forbes, February 29, 2024. Los Angeles Times: “[\\$3.85M Los Angeles Times website trackers class action settlement](#),” Top Class Actions, March 4, 2026. NorthBay Healthcare: “[NorthBay Healthcare Data Breach Settlement](#),” ClaimsHero. Eisenhower Medical Center: “[California Teaching Hospital Settles Meta Pixel Data Breach Lawsuit](#),” HIPAA Journal, July 16, 2025. Pomona Valley Hospital Medical Center: “[Pomona Valley Hospital Medical Center Pays \\$600K to Settle Meta Pixel Lawsuit](#),” HIPAA Journal, November 6, 2025. Joyous PBC: “[Joyous PBC Settlement](#),” Claim Depot, 2025.

2.3 COSTS OF CIPA LITIGATION

The settlements discussed in the previous section capture only one component of the costs associated with CIPA litigation: payments made to resolve claims. Firms also incur defense costs in responding to these claims, regardless of how cases are ultimately resolved, and these costs are not reflected in observed settlement outcomes.

To provide a broader perspective on these costs, this section develops an illustrative estimate of the costs associated with defending filed CIPA cases. The estimate is necessarily uncertain, as there is little systematic evidence on how cases progress or on the costs incurred at each stage. The assumptions used here should therefore be understood as stylized approximations, and the resulting figure as indicative of the order of magnitude of potential costs rather than a precise estimate.

CIPA cases, like most civil litigation, proceed through a series of stages, with some resolved at earlier stages through dismissal or settlement, while others advance into discovery and later phases of litigation. Costs rise materially as cases progress, reflecting increasing legal complexity and resource demands. The framework shown in Figure 7 captures these dynamics by assigning indicative cost ranges to each stage, along with stylized assumptions about the share of cases that reach them. It should be emphasized that these shares are not based on systematic data and should be interpreted as illustrative approximations of how cases may progress in practice.

Fig. 7: Illustrative defense costs of filed CIPA cases by stage of litigation

PHASE / STAGE	Approximate cost range	Central estimate	% of cases reaching stage	Expected costs
Early stage (pre-answer / MTD)	\$15,000 – 75,000	\$50,000	100%	\$50,000
Discovery	\$100,000 – 300,000	\$200,000	30%	\$60,000
Pre-trial (summary judgment)	\$75,000 – 200,000	\$150,000	15%	\$22,500
Trial prep / late resolution	\$150,000 – 500,000	\$300,000	5%	\$15,000
Total	\$340,000 – 1,075,000	\$700,000		\$147,500

Source: Oxford Economics

Based on this framework, a case that proceeds through all stages of litigation to judgment is estimated to cost between \$340,000 and \$1.1 million to defend, with a central estimate of \$700,000. These estimates are intended to be illustrative and conservative, and do not encompass all potential CIPA cases—a large, complex class action could easily cost more. However, because many cases are resolved at earlier stages, through dismissal or settlement, the expected cost across

all filed cases is substantially lower. Weighting these stage-specific costs by the assumed share of cases reaching each stage yields an expected defense cost of approximately \$150,000 per case.

Applying this illustrative per-case cost to the 4,072 CIPA cases in the Fisher Phillips dataset yields aggregate defense costs for these cases of approximately \$600 million. This figure should be

interpreted with caution. As noted, the parameters used in this estimate are highly uncertain. Moreover, not all filed cases have progressed through the full litigation process, and as a result, a portion of these costs have not yet been realized, and may change depending on how the current wave of litigation evolves. Additionally, this estimate applies only to the cases filed to date and observed in the Fisher Phillips data—as the number of cases continues to rise, defense costs are expected to rise proportionately.

Beyond defense costs, CIPA litigation also consumes resources on the part of plaintiffs and the court system. A simple scaling from the estimates above suggests that plaintiff-related costs may represent a

substantial but smaller share of total litigation costs, while court-related costs are likely to be modest in comparison. **On this basis, total resource costs—including both private and public components—may be on the order of roughly 40% higher than defense costs alone, or approximately \$840 million for cases filed to date.**

These figures exclude any settlement payments, which were discussed in Section 2.2. Additionally, a broader set of costs arises outside of filed litigation in the form of demand letters, which are considered in the following section.

2.4 CIPA DEMAND LETTERS

Alongside the filed CIPA cases considered above is a considerably larger number of legal demand letters sent to website owners alleging CIPA violations and seeking quick, relatively low-value payoffs. Examples of such demand letters are easy to find online.⁹

For most businesses, the experience begins when an unexpected letter arrives, typically alleging multiple CIPA violations tied to website visits by the plaintiff. The stated exposure may exceed \$100,000, driven by CIPA’s \$5,000-per-violation structure, but the letter typically proposes a settlement in the \$20,000–50,000 range, less than the cost of defending the claim in court. According to interviewees, such cases tend to settle for about \$7,500–20,000, depending on the size of the defendant and the particulars of the negotiation.

This settlement does not represent the full cost to demand letter recipients. Most retain outside counsel, who will assess the allegations and negotiate a resolution with the plaintiff. Interviewees estimated \$5,000–12,000 in direct legal costs for a straightforward settlement.

Technical remediation of websites represents another cost category for demand letter recipients. A formal CIPA assessment for a simple website may cost \$10,000, while website reconfiguration may cost this much again. However, many small businesses attempt to remove the tracking technologies on their own or through their existing website vendor at low cost. For businesses that rely more heavily on these technologies, remediation may be more involved and may cost far than what is assumed here. According to subject matter experts, most compliance strategies involve consent banners, but these are still prone to technical errors, and CIPA requirements are unclear, even to those in the field.

The final cost component considered here is the time cost to small business owners themselves of dealing with these matters. Even the simplest case will consume 10–20 hours of staff time, representing roughly another \$5,000 of lost productivity.

9 For example: “CIPA Demand Letter Examples: 3 Real Redacted Letters,” Enzuzo.

Fig. 8: Representative costs of a CIPA demand letter case

Cost component	Cost range	Cost estimate
Settlement costs	\$7,500 – 20,000	\$10,000
Outside legal counsel	\$5,000 – 12,000	\$10,000
Website assessment and remediation	\$0 – 20,000+	\$5,000
Time cost	\$5,000+	\$5,000
Total	\$17,500 – 57,000+	\$30,000

Source: Subject matter expert interviews

Interviewees estimated approximately 10 CIPA demand letters are sent for every CIPA case filed. Based on the Fisher Phillips case count, this would suggest approximately 40,000 demand letters have been sent to date. Combined with our average cost estimate of \$30,000 per demand letter in Figure 8, **this implies that the costs associated with CIPA demand letters to date total approximately \$1.2 billion** (40,000 letters × \$30,000 per letter), with direct settlement costs representing approximately one-third of this. Some commentators estimate the number of demand letters even higher, perhaps as many as 50,000–100,000 to date.¹⁰ This would imply total costs from CIPA demand letters of \$1.5 billion–\$3 billion.

These costs to businesses from CIPA litigation represent real resource costs to firms, which might otherwise use these funds to increase production, invest and expand, and hire more workers. The \$1.2 billion in costs from CIPA demand letters described in this section, together with the approximately \$600 million in defense costs estimated in Section 2.3, therefore represent resources that have been redirected toward litigation-related activity. **This is equivalent to roughly 9,500 worker-years of economic activity based on average worker productivities.**¹¹

This comparison is illustrative and reflects the scale of resources involved rather than a net employment effect: while these expenditures are reallocated within the economy, they nevertheless represent resources that would otherwise be available for investment, hiring, or other productive uses.

The distribution of these \$1.8 billion in costs across industries is likely to reflect, at least broadly, the distribution of filed cases shown in Figure 3. On this basis, retail—representing approximately 36% of filed cases—would account for the largest share of total costs (approximately \$650 million), followed by technology (12% or \$220 million), professional and technical services (7% or \$130 million), and finance (6% or \$110 million). This approximation should be interpreted with caution, as the prevalence and resolution of demand letters may not fully align with the prevalence of filed cases, but it provides a useful indication of how the economic burden of CIPA litigation is likely to be distributed across industries.

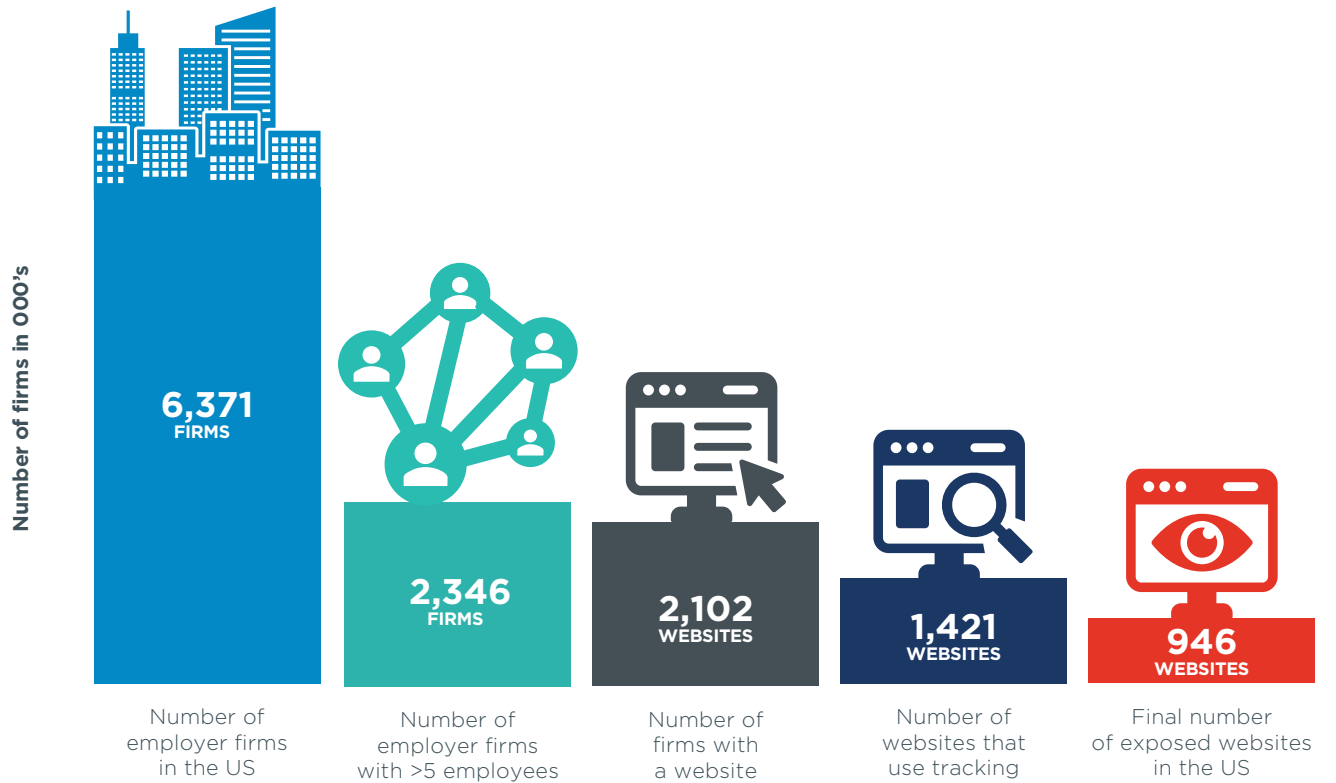
2.5 THE SCALE OF POTENTIAL CIPA TARGETS

The preceding sections have considered the scale CIPA litigation and demand letters through early 2026, and have shown that the number of filed cases continues to expand exponentially. This section attempts to place an upper limit on the CIPA’s potential scale by estimating the number of entities that could theoretically be the target of a CIPA lawsuit or demand letter.

In principle, any entity that operates a website or app accessible to California users that deploys third-party tracking technologies could be a CIPA target. In practice, we restrict attention to US-based (including US subsidiaries of foreign companies) commercial and non-profit entities of sufficient scale with a public facing webpage using the relevant technologies in industries represented in the Fisher Phillips data.

To estimate the number of such entities, we use data from the Statistics of U.S. Businesses (SUSB), the federal government’s most comprehensive count of employer firms by size and industry.¹² The primary limitation of the SUSB data for these purposes is that it entirely excludes government entities. While government entities are, in principle, susceptible to CIPA lawsuits, they have not been a major target of CIPA lawsuits to date (there are only four such cases in the Fisher Phillips data) and may be less likely to employ the type of web technologies implicated in CIPA lawsuits. The SUSB does include non-profit organizations—which are subject to CIPA and have been the subject of CIPA litigation—so long as they have paid employees.

Fig. 9: Process of estimating scale of potential CIPA website targets (numbers in 000s)



Source: Subject matter expert interviews

10 Claire Bowen and Anna Schall Kreamer, “CIPA Suits: Why a 60-Year-Old Law Makes Your Website a Target,” Constangy, Brooks, Smith & Prophete, LLP, February 18, 2026.

11 Based on a 2025 average GDP per worker of \$190,000. US Bureau of Economic Analysis (BEA), [National Income and Product Accounts \(NIPA\)](#).

12 U.S. Census Bureau. [Statistics of U.S. Businesses](#) (SUSB), 2022. U.S. Department of Commerce.

According to the most recent SUSB data, there were 6.4 million employer firms in the US. We begin by excluding the 4.0 million firms with fewer than five employees as being less likely to maintain a website with CIPA noncompliant technologies, or to be seen as a ripe target for a CIPA lawsuit or demand letter. This leaves a universe of 2.4 million firms.

To estimate the share of these firms which have a website, we use a 2024 World Bank survey, which indicated that 88% of firms with 5–19 employees, 94% of firms with 20–99 employees, and 97% of firms with 100 or more employees operate a website.¹³ This results in a total of 2.1 million firms with websites.

To estimate the share of these firms whose websites use tracking tools that potentially expose them to CIPA liability, we apply estimates informed by data from National Media Insights (NMI).¹⁴ Specifically, we assume that 50% of webpages maintained by firms with fewer than 10 employees contain tracking technology, rising to 70% for firms with 10–19

employees, 90% for those with 20–49 employees, 95% for those with 50–99 employees, and effectively universal adoption among firms with over 100 employees. Applying these assumptions yields a total of approximately 1.4 million firms with websites deploying tracking technologies.

Finally, we apply industry-specific assumptions based on the Fisher Phillips data. Specifically, for those industries less represented in Fisher Phillips than in SUSB, we discount their totals by the ratio of their share in Fisher Phillips to their share in SUSB. This results in a final estimate of 946,000 potential CIPA targets in the US.

Figure 10 shows the breakout of these 946,000 entities by employment size class. Figure 11 shows the same breakout, also based on SUSB data and similar assumptions, for firms with an establishment in California, yielding an estimate of 120,000 such entities.

Fig. 10: Estimated number of potential CIPA targets nationally by employment size class

Number of employees (000s)	Number of firms (000s)	Number of websites (000s)	With “tracking” technology (000s)	After FP industry adjustment (000s)
0-4	4,025			
5-9	1,033	907	454	313
10-19	656	576	403	266
20-49	425	398	358	228
50-99	130	122	110	72
100-199	56	55	52	36
>200	46	45	45	31
Total	6,371	2,102	1,421	946

Source: Oxford Economics

13 World Bank Group. [United States Enterprise Survey 2024 \(WBES 2024\)](#). Enterprise Surveys, World Bank Group. Data collected 2024; released May 2025.

14 National Media Insights (NMI). [How Many U.S. Websites Run Tracking Pixels? Tracking Pixel Prevalence in the United States](#). March 2026. Because no comprehensive dataset exists on the prevalence of specific tracking technologies by firm size, these assumptions are intended to provide a reasonable approximation rather than a precise measurement of current practice. This is also the dimension of the analysis most likely to evolve over time, as firms become increasingly aware of CIPA litigation and adjust their website configurations in response.

Fig. 11: Estimated number of potential CIPA targets in California by employment size class

Number of employees (000s)	Number of firms (000s)	Number of websites (000s)	With “tracking” technology (000s)	After FP industry adjustment (000s)
0-4	538			
5-9	133	116	58	39
10-19	84	74	52	33
20-49	52	49	44	27
50-99	16	15	14	9
100-199	8	8	7	5
>200	11	11	11	7
Total	842	272	185	120

Source: Oxford Economics

There is considerable uncertainty in these estimates, as described above. Nevertheless, they indicate that the scale of magnitude of potential CIPA litigation, if a large share of all potentially exposed firms were targeted, is enormous. Even if most CIPA targets only received demand letters aimed at quick, small settlements, the costs would easily run into the tens of billions of dollars.

However, the rapid expansion of CIPA litigation to date (Figure 2) has been contingent on legal uncertainty and the relative lack of familiarity of those receiving CIPA lawsuits or demand letters with CIPA. As the litigation wave continues to expand, even without clear and final judicial rulings, we can expect countervailing pressures as:

- Firms adjust their webpages pre-emptively to curtail CIPA liability;
- Judicial rulings inevitably push back on the limits of CIPA liability in some jurisdictions;
- Plaintiffs and courts reach practical limits on their ability to continue expanding CIPA litigation; and
- The legislature potentially takes action.

In the following section, we turn to three recent examples of comparable litigation waves to gain practical insights into how such waves evolve.



SECTION 3: COMPARABLE LITIGATION WAVES

As of early 2026, CIPA litigation continues to expand without any clear signs of slowing. This section looks to recent litigation waves under other statutes to attempt to glean insights that may be relevant to CIPA's future trajectory. Below, three recent examples have been selected of established statutes under which private litigation rapidly accelerated following

a technological shift. These three examples and CIPA share a number of similarities, but the most important of them in fostering litigation waves is that the scaling nature of the technology involved makes it possible for plaintiffs to identify and construct legal cases against similarly situated defendants rapidly and at low cost.

Fig. 12: Characteristics of five litigation waves

	CIPA	VPPA	BIPA	TCPA
Subject	Third-party web technologies	Online video privacy	Biometrics privacy	Telemarketing practices
Statutory damages per violation	\$5,000	\$2,500	\$1,000-\$5,000	\$500-\$1,500
Statute passed	1967	1988	2008	1991
Litigation wave start (approximate)	2020	2021	2019	2010
Cases filed to date	4,000	600	2,500	40,000
Aggregate damages to date	\$150 million (public)	Tens of millions	Over \$1 billion	Many billions
Extensive demand letters seeking out of court settlements?	Yes	Yes	No	Yes
Legislative action in response to litigation?	No (proposed)	No	Yes (2024)	No

Source: Oxford Economics

3.1 VPPA

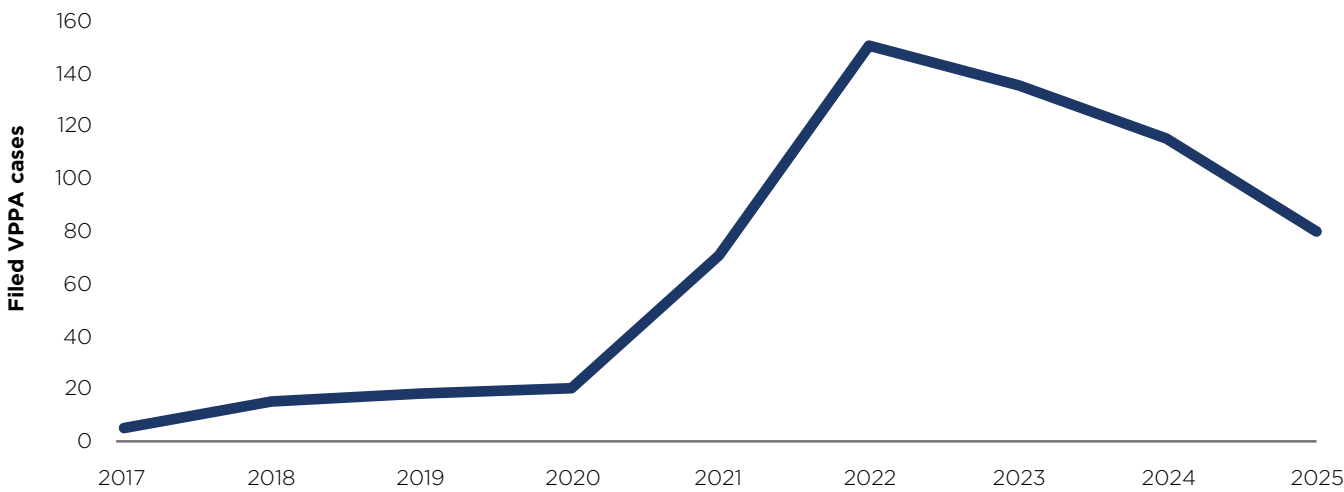
The Video Privacy Protection Act (VPPA) was passed by Congress in 1988 following the disclosure of Supreme Court nominee Robert Bork’s video rental history to a local newspaper. The law prohibits disclosures of personally identifiable information about consumers’ video viewing without consent and provides for a private right of action of \$2,500 per violation.

The first application of the VPPA to the world of online streaming video happened around 2012,¹⁵ with a modest number of cases filed through the 2010s. However, the real wave of VPPA litigation began around 2021, roughly contemporaneous with CIPA, and involving some of the same website tracking technologies as applied to digital video.

Through 2025, approximately 600 VPPA cases have been filed cumulatively according to data from Duane Morris.¹⁶ As with CIPA, plaintiffs have sent significantly more demand letters than cases filed.¹⁷ There have been several successful class-action settlements, including approximately \$5 million each in settlements with the Boston Globe,¹⁸ Bleacher Report,¹⁹ and Dapper Labs, Inc.²⁰

Declines in VPPA litigation in recent years could suggest that adverse court rulings are constraining this wave; however, 80 new cases were filed in 2025. While not currently expanding rapidly like the CIPA wave, the VPPA wave does not appear to be near its end.²¹

Fig. 13: VPPA cases filed per year, 2017–2025



Source: Duane Morris

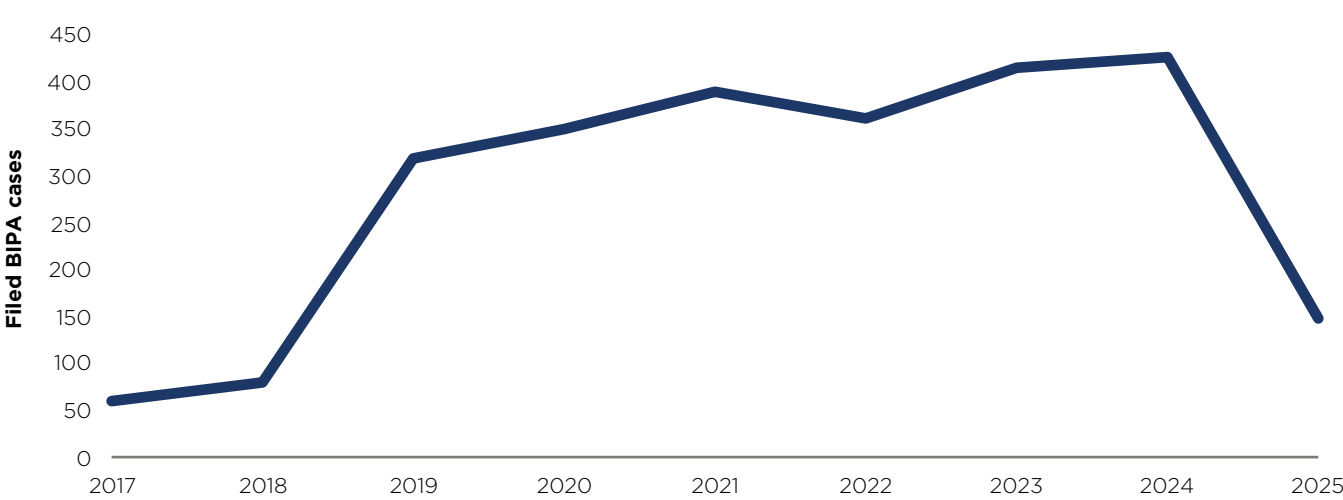
3.2 BIPA

Illinois’ Biometric Information Privacy Act (BIPA) was passed by the state legislature in 2008. BIPA places certain requirements on entities collecting biometric data and authorizes a private right of action of \$1,000 per negligent and \$5,000 per reckless or intentional violation.

BIPA litigation expanded rapidly starting in 2019. Observers attribute this at least in part to a plaintiff-friendly state supreme court decision (*Rosenbach v. Six Flags*). A second state supreme ruling (*Cothron v. White Castle*) in February 2023 may have further accelerated the wave, but also may have helped encourage the Illinois state legislature to amend the BIPA statute. It did so in August 2024, limiting damages to a single recovery per individual for repeated biometric collections using the same method.

New BIPA filings declined sharply in 2025, but the long-term success in controlling the BIPA litigation wave remains to be seen. Between 2017 and 2025, over 2,500 BIPA cases were filed, according to data from Duane Morris.²² The total value of BIPA settlements and judgments to date well exceeds \$1 billion, with the largest BIPA settlements including \$650 million against Facebook, \$100 million against Google, and \$92 million against TikTok.²³

Fig. 14: BIPA cases filed per year, 2015–2025



Source: Duane Morris

15 Schooner Sonntag, “A Square Peg in a Round Hole: The Current State of the Video Privacy Protection Act for Videos on the Internet and the Need for Updated Legislation,” *Loyola of Los Angeles Entertainment Law Review* 37, no. 3 (2017): 271–305.

16 Duane Morris LLP, Gerald L. Maatman, Jr. & Jennifer A. Riley, VIDEO – DMCAR Trend #4: The Landscape of Privacy Class Actions Continued To Shift (Jan. 13, 2026).

17 Skye Witley, “Video Privacy Class Action Wave Slowed by High Dismissal Rate,” *Bloomberg Law*, November 20, 2023.

18 “Boston Globe Facebook Tracking Pixel \$5M Class Action Settlement,” *Top Class Actions*, October 6, 2023.

19 “Bleacher Report to Payout \$4.8 Million in VPPA Class Action Settlement,” *USA Today*, June 24, 2024.

20 “\$5M Dapper Labs Settlement Ends Class Action Lawsuit Over Alleged Data Sharing,” *ClassAction.org*, February 19, 2026.

21 WilmerHale, 2025 Year In Review: Video Privacy Protection Act Litigation Trends (Jan. 23, 2026).

22 Duane Morris LLP, Gerald L. Maatman, Jr. & Jennifer A. Riley, VIDEO – DMCAR Trend #4: The Landscape of Privacy Class Actions Continued To Shift (Jan. 13, 2026).

23 Benjamin Hines, “Illinois Biometric Data Law a Threat to Businesses,” *Illinois Policy Institute*, April 17, 2026.

3.3 TCPA

The Telephone Consumer Protection Act (TCPA) was passed in 1991 in response to consumer complaints about telemarketing practices, including automated calls, prerecorded messages, and unsolicited faxes. Congress prohibited certain categories of calls and messages without prior consent and authorized a private right of action of \$500 per violation (triple if willful or knowing).

TCPA filings rose rapidly from only a couple dozen per year as late as 2009, to over 1,000 in 2012, to a peak of nearly 5,000 newly filed cases in 2016 alone. Many of these cases concerned text messaging, a technology not envisioned when the statute was passed. As with CIPA and VPPA, a proliferation of low-value demand letters has been a feature of TCPA litigation, in addition to filed cases.²⁴

Both judicial rulings and regulatory actions have plausibly contributed to the dynamics of TCPA litigation activity shown in Figure 15. To a first approximation, regulatory actions by the Federal Communications Commission in 2012 and 2015 expanded TCPA liability and encouraged litigation, while judicial decisions in 2018 and 2021 restricted liability and restrained litigation. Notably absent has been any legislative attempt by Congress to reign in the wave of TCPA litigation.

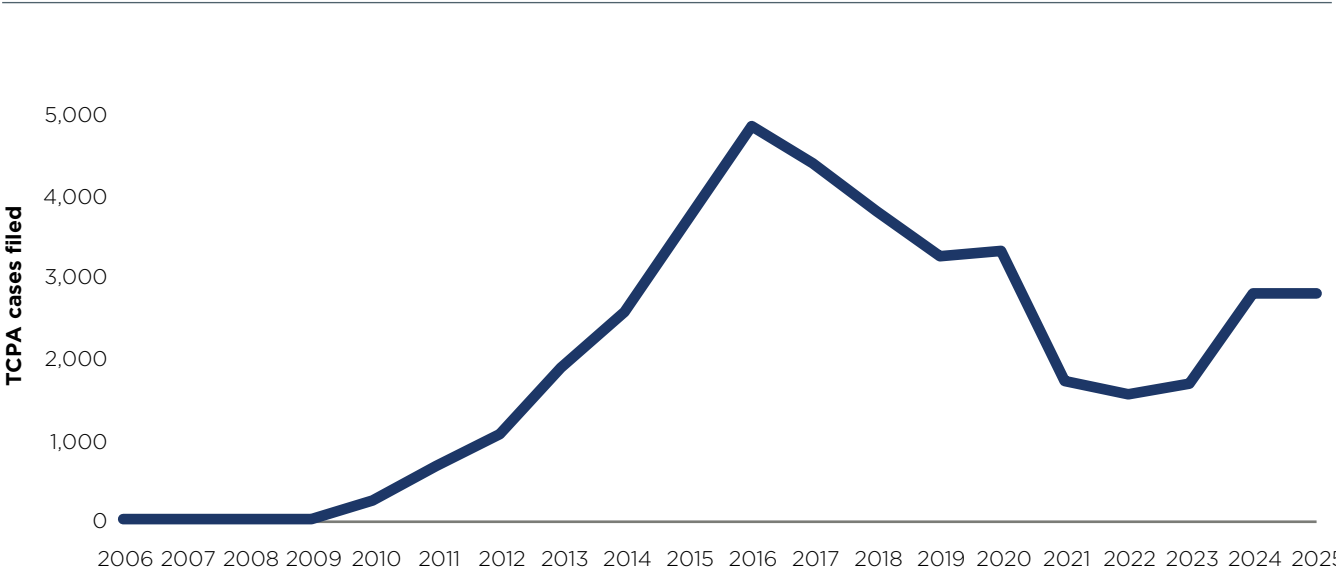
Because it started earlier, and so has lasted longer, than any of the other litigation waves considered here, TCPA better demonstrates the longer-term dynamics of litigation waves. By the time TCPA case filings had reached their peak in 2016, they had been rising by over 30% each year for eight consecutive years, and over 15,000 cases had been filed. Only

at this point was TCPA litigation unable to further sustain exponential growth. But this slowdown in growth was not the beginning of the end; over the subsequent nine years through 2025, a further 25,000 TCPA cases have been filed.

The overall scale of TCPA damages has been enormous. One analysis found that settlements just for the year 2018 totaled \$171 million, with an average cost of \$6.6 million per settled case.²⁵ Another found that just the top 35 TCPA settlements alone totaled over \$1.5 billion in damages.²⁶ Over three-quarters of TCPA cases have been filed as class actions in recent years.²⁷

The recent uptick in TCPA filings since 2023 has been interpreted by some commentators to be a response to AI-generated telemarketing calls and texts.²⁸ After a decade and a half, the TCPA litigation wave shows no sign of ending.

Fig. 15: TCPA filings per year²⁹



Source: Webrecon

3.4 CONCLUSIONS FROM PAST LITIGATION WAVES

As noted above, the fundamental characteristic that enables litigation waves of the sort described here is the ability of plaintiff law firms to rapidly identify similarly situated litigation targets through technological means and to develop cases against them rapidly and at low cost. Once legal regimes are triggered by technological shifts, litigation can surge quickly and remain high for years, even after the growth of new filings slows. While the four litigation waves considered here demonstrate somewhat similar dynamics, a comparison of the case counts in the four examples (see Figure 1) demonstrates that CIPA's growth trajectory already far exceeds that under VPPA or BIPA quantitatively, and is comparable to that in the early years of the TCPA wave.

An important and potentially counterintuitive feature of these litigation waves is that legal uncertainty can persist over many years even as

the volume of cases filed expands dramatically. Where potential damages are large and trial costs significant, each defendant has a strong incentive to delay to allow other cases to proceed to judgment and, potentially, to appellate review, to test the relevant legal theories. At the same time, the large pool of potential targets gives plaintiffs little incentive to pursue appeals of weaker cases that are dismissed. This incentive structure helps explain how CIPA-related litigation can extend over multiple years, generating significant economic costs, while producing relatively little appellate guidance on the statute's application to modern web technologies.

The implications of these historical examples for the CIPA litigation wave discussed in section 2 will be taken up more fully in section 5. First, section 4 will consider the relevant web technologies themselves, and the implications of CIPA on them.

24 Newman, Richard B. [How to Respond to TCPA Demand Letters](#). National Law Review, February 1, 2026.

25 Womble Bond Dickinson. (2018). [Happy Halloween TCPAland!: More Ghoulish TCPA Statistics to Freak You Out](#). JD Supra, October 31, 2018.

26 Aleksandar Pešić (2025) [35 Biggest TCPA Lawsuits Ever](#) Leadshook. Note that this total includes \$510 million in governmental enforcement actions.

27 Eric J. Troutman (2025) ["Numbers Don't Lie – Statistics Show Why TCPA Risk Is 10× Higher Than Risk Posed by Other Consumer Protection Statutes"](#) National Law Review, December 2, 2025.

28 Saunders, Margot (2025). [Top Six TCPA/Robocall Developments in 2024/2025](#). National Consumer Law Center.

29 WebRecon. [WebRecon December 2025 Litigation Statistics: Year in Review](#). WebRecon LLC, December 2025. Oxford Economics reconstructed older WebRecon statistics back to 2006 based on WebRecon pages and the [Internet Archive](#).

SECTION 4: CIPA AND THE WEB

When a modern webpage loads, or an app is used, the user's browser or device executes code that transmits information about the visit to multiple recipients. Whether and how these transmissions may violate CIPA is a matter upon which courts disagree.³⁰

Important web and mobile technologies that rely on the automated transmission of user data to third parties include:³¹

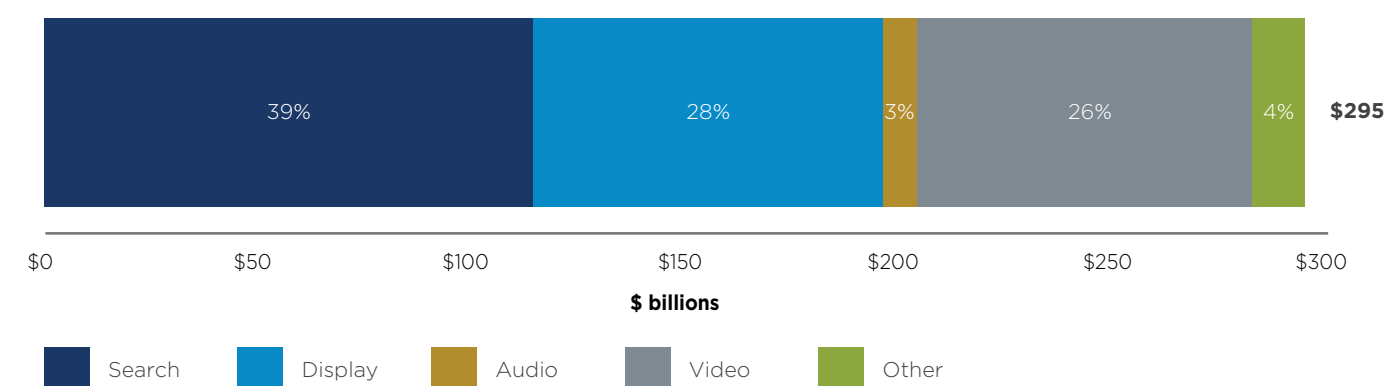
- Session-replay and behavioral logging tools;
- Third-party performance and error-monitoring analytics;
- Software development kits (SDKs) embedded in web and mobile applications;
- Customer-support chat widgets and chatbots;
- Fraud-prevention and security services;
- Content delivery and optimization services; and
- Identity, authentication, or consent-management tools.

Technical solutions might ultimately allow some of these technologies to comply with CIPA, but the legal opacity surrounding CIPA's requirements impedes such solutions. Technical solutions would also involve

engineering costs and likely negative impacts on the user experience, such as the now-ubiquitous consent banners. Common advice to website operators seeking to ensure their webpages are CIPA compliant includes: to consider removing unnecessary "trackers" and to obtain user consent, with complex instructions for both.³² These instructions are further complicated by the need to comply with other website regulatory regimes, including those under California's CCPA/CPRA, the European Union's General Data Protection Regulation (GDPR), and accessibility requirements under the Americans with Disabilities Act (ADA).

Of particular concern is the effect that the legal uncertainty around CIPA may have on the \$295 billion US digital advertisement industry, which now represents approximately three-quarters of all US advertising spending.³³ Tracking technologies serve several related economic functions in digital markets. In particular, tracking technologies enable firms both to target advertising to specific users based on observed behavior and characteristics, and to measure the effectiveness of those campaigns in order to adjust spending and strategy over time. They thus reduce information frictions, enabling firms to better match products with consumers and allocate resources more efficiently.

Fig. 16: Digital advertising spending, 2025³⁴



Source: PWC/IAB

³⁰ Courts Still Divided on Whether California Privacy Law Applies to Website Tracking: 4 Rulings in 10 Days Highlight Business Confusion, Fisher Phillips LLP (Apr. 21, 2026).

³¹ Kayla Bushey, *US Data Privacy Litigation: Website Tracking Litigation*, International Association of Privacy Professionals (2025).

³² Gibson, David. *Cookie Banners, CIPA & Privacy Compliance: A Practical Guide*. Propeller Media Works, July 15, 2025.

³³ George, Miltos. (2025). *2025 Ad Spend Benchmarks by Sector*. Growth-onomics. November 15, 2025.

³⁴ Interactive Advertising Bureau (IAB). (2026). *IAB Internet Advertising Revenue Report: Full-Year 2025 Results*. Conducted by PricewaterhouseCoopers LLP. April 2026.

Constraints on these capabilities affect markets through multiple channels. First, reduced access to tracking data impairs measurement and attribution, making it more difficult for firms to evaluate the return on advertising and optimize spending. Second, diminished targeting effectiveness raises customer acquisition costs by limiting firms' ability to match products with interested consumers. Third, these effects can increase barriers to entry by raising the cost of reaching customers, disproportionately affecting smaller firms that rely more heavily on targeted and measurable advertising to compete against larger incumbents.

Tracking technologies also support personalization and recommendation systems that reduce search costs and increase consumer engagement, and enable firms to re-engage users who have demonstrated purchase intent, improving conversion rates.

Experimental work by Wernerfelt et. al. has estimated that losing access to these technologies increases the cost to digital advertisers by 31% per incremental customer.³⁵ In practice, advertisers would not simply increase spending to maintain the same number of customers. This is why the social cost even of the universal loss of all such tools would not be \$91 billion = (31% increased cost) × (\$295 billion in digital advertising), even if one appropriately discounted Wernerfelt's results to better apply to the heterogeneous digital advertising market. Advertising is a classic example of an industry where private and social benefit do not coincide—Pepsi's advertising success costs Coke.

However, economic theory does predict that the erosion of targeting effectiveness in digital advertising, which continued CIPA litigation is expected to exacerbate, is likely to impose social costs. In equilibrium, a decrease in targeting effectiveness (i.e., more generic, less targeted advertisements) is expected to increase overall

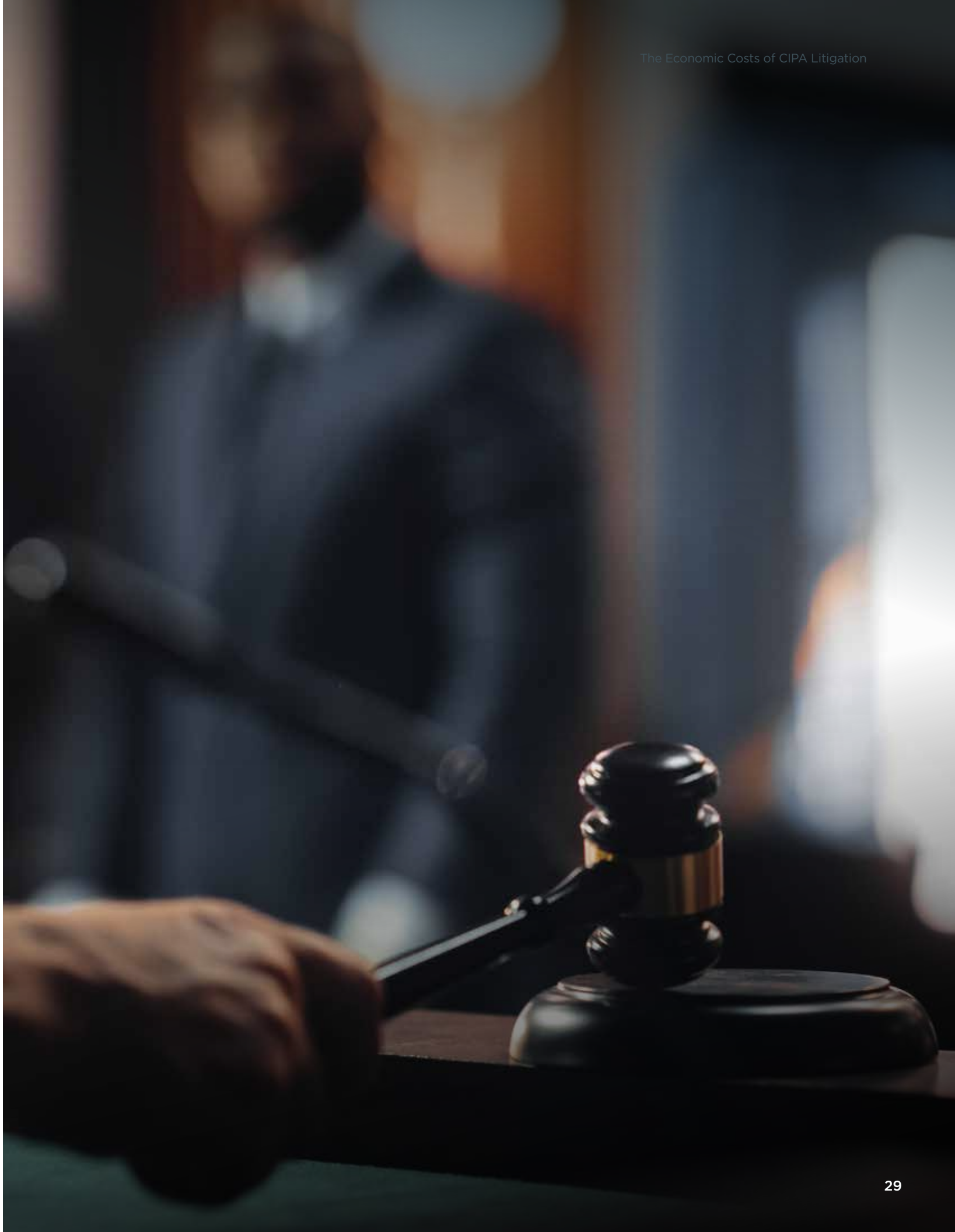
advertising spending, resulting in higher product prices to consumers. In empirical work exploring the effects of Apple's 2021 App Tracking Transparency change, Deisenroth et. al. found that industries more affected than average by this loss of tracking technology saw prices rise by 3.5% relative to industries that were less affected than average.³⁶ The loss of tracking also led to firm exit, with state-industry pairs more affected by the change experiencing a 1.4% decline in active business establishments relative to those less affected. Smaller businesses, and those with more niche products are hit harder, as they rely more on targeted advertising to reach their smaller customer bases. Consumers also face additional burdens on their attention from more irrelevant ads.

Taken together, these results suggest that reductions in tracking and targeting capabilities affect digital markets through higher customer acquisition costs, higher prices, and reduced firm entry, with particularly pronounced effects on smaller and more specialized firms.

It is important to note that these social costs from decreased effectiveness in advertising targeting do not, in themselves, imply that improved targeting is socially beneficial; gains from improved ad targeting must be weighed off against privacy considerations. Because of its outdated structure premised on 20th century telecommunications technology, CIPA-based compliance standards do not meaningfully embody such balancing.

35 Wernerfelt, N., Tuchman, A., Shapiro, B. T., & Moakler, R. (2024). Estimating the value of offsite tracking data to advertisers: Evidence from Meta. Marketing Science, 44(2), 268-286.

36 Daniel Deisenroth, Utsav Manjeer, Zarak Sohail, Steven Tadelis & Nils Wernerfelt, Digital Advertising and Market Structure: Implications for Privacy Regulation, NBER Working Paper No. 32726 (July 2024, rev. Feb. 2026).



SECTION 5: CONCLUSION

According to the statistics from Fisher Phillips, more than 4,000 CIPA websites or app-privacy lawsuits have been filed to date, with filing activity continuing to accelerate. Despite this volume, no cases have yet proceeded to a final judgment with damages at trial, and only a limited number of publicly disclosed class action settlements have been reported, together totaling over \$150 million in damages. These observed settlements are unlikely to be representative of the broader caseload and therefore provide only limited guidance regarding expected outcomes in the many cases still pending or yet to be filed. Independent of settlements, defense costs associated with these filed cases are substantial, on the order of \$600 million, or roughly \$850 million when including litigation-related costs borne by plaintiffs and the court system.

Alongside these filed cases, tens of thousands of demand letters have been sent seeking quick, lower-value settlements. Based on interviews with subject matter experts, we estimate that such letters typically settle for damages of around \$10,000, with total costs to targeted firms—including legal fees, remediation, and time costs—approximately three times that amount. On this basis, and based on an estimate of 10 demand letters for each case filed, we estimate cumulative costs associated with CIPA demand letters of approximately \$1.2 billion to date.

The universe of entities potentially exposed to CIPA liability is large. Based on firm size, digital presence, and industry exposure, we estimate that close to 1 million US entities—and approximately 120,000 with a physical presence in California—operate websites or apps likely with technologies implicated in CIPA litigation. It is neither plausible nor necessary to assume that all such entities will ultimately be targeted. Growing awareness, proactive remediation, further court rulings, and legislative clarification may all constrain the future trajectory of CIPA enforcement.

To place CIPA in context, the report examines three prior litigation waves—arising under VPPA, BIPA, and TCPA—in which private enforcement provisions were applied to technologies that existing statutes were not designed to govern. These episodes show that once such regimes are activated by technological change, litigation activity can expand rapidly and remain elevated for many years, even after growth in new filings slows. In particular, experience under VPPA and TCPA demonstrates that uncertainty around the scope of liability can persist over extended periods, with costs accruing primarily through ongoing filings, settlements, and compliance efforts rather than through definitive adjudication on the merits. Taken together, these examples suggest that the economic significance of a statutory-damages litigation wave lies less in any single outcome than in its duration and cumulative burden over time.

Beyond litigation and settlement costs, continued CIPA uncertainty generates additional economic effects through changes in how websites and apps are designed and operated. Faced with unclear liability boundaries, firms respond by removing third-party tools or conditioning their use on user consent, both of which impose costs and offer limited assurance of compliance. In the digital advertising market, where automated tracking and measurement are central to targeting efficiency, restrictions on these tools are expected to raise customer acquisition costs, increase consumer prices, and disproportionately affect smaller businesses that rely more heavily on targeted outreach. In this way, the economic impact of CIPA extends beyond direct litigation costs to broader distortions in digital markets induced by prolonged legal uncertainty.



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To discuss the report further please contact:

Dan Martin

danmartin@oxfordeconomics.com

Oxford Economics
5 Hanover Square,
8th Floor, New York
NY 10004, USA

Tel: +1 (646) 786 1879

www.oxfordeconomics.com

CONTACT

Global headquarters

Oxford Economics Ltd
60 St Aldates, Oxford,
OX1 1ST, UK
Tel: +44 (0)1865 268900

London

4 Millbank, London,
SW1P 3JA, UK
Tel: +44 (0)203 910 8000

Frankfurt

Marienstr. 15
60329 Frankfurt am Main
Germany
Tel: +49 69 96 758 658

New York

5 Hanover Square,
8th Floor, New York
NY 10004, USA
Tel: +1 (646) 786 1879

Singapore

6 Battery Road
#38-05
Singapore 049909
Tel: +65 6850 0110

Email:

mailbox@oxfordeconomics.com

Website:

www.oxfordeconomics.com

Further contact details:

[www.oxfordeconomics.com/
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