

Douglas and Michelle Bottoms

5504 Landmark Place, Fairfax, Virginia 22032. doug.bottoms@gmail.com. 517-214-8014

SENT BY CERTIFIED MAIL

March 13, 2026

Office of the Attorney General of Virginia
Consumer Protection Section
202 North Ninth Street
Richmond, Virginia 23219

RECEIVED

MAR 13 2026

CONSUMER PROTECTION SECTION

RE: FORMAL COMPLAINT & REQUEST FOR INTER-AGENCY COORDINATION

Violations of Virginia Consumer Data Protection Act (Va. Code § 59.1-571 et seq.)
Respondents: RCX Sports, National Sports ID, App-Order LLC (d/b/a Zorts Sports), and Flag Football Life Related Federal Action: FTC Case Number 197601895

Dear Attorney General Jones and the Consumer Protection Section:

We are residents of Fairfax, Virginia, and we are submitting this formal complaint on behalf of our 12-year-old son, KB. We are writing to alert your office to systemic business practices by the above-named youth sports organizations and data brokers that actively violate the Virginia Consumer Data Protection Act (VCDPA) and negatively impact families across the Commonwealth.

We have already filed a formal federal complaint regarding these practices with the Federal Trade Commission (FTC), which is currently pending under Case Number 197601895. The FTC point of contact is Ben Wiseman, bwiseman@ftc.gov.

Given the scale of these violations, we are asking your office to investigate these state-level infractions and coordinate directly with Mr. Wiseman and FTC's Division of Privacy and Identity Protection (DPIP) to address this nationwide data-harvesting scheme.

I. NATURE OF THE VIOLATIONS

The Respondents have instituted a mandatory "pay-with-data" scheme that conditions a child's participation in youth sports tournaments on the surrender of sensitive personal data, including biometric facial scans and social media history. As detailed in the enclosed Statement of Facts, this conduct directly conflicts with the VCDPA's protections for "known children".

Specifically, the Respondents are in violation of:

- Va. Code § 59.1-574(A)(1) – Data Minimization: Controllers must limit the collection of personal data to what is "adequate, relevant, and reasonably necessary". The Respondents

demand permanent digital tracking and biometric data for simple age verification. Through "exemption accommodations" we secured for our son, we have proven that manual review of a traditional birth certificate is sufficient, rendering the digital collection entirely unnecessary.

- Va. Code § 59.1-574(A)(5) – Sensitive Data Protection: The VCDPA classifies data collected from a "known child" (under 13) as Sensitive Data. Respondents are processing this sensitive data for secondary purposes—including "targeted advertising strategies" and "profit sharing"—without obtaining valid, uncoerced consent.
- Va. Code § 59.1-574 (as amended by SB 361) – Prohibition on Profiling Children: Effective January 1, 2025, Virginia law expressly prohibits processing a known child's data for targeted advertising or profiling. Respondents' own privacy policies admit to aggregating children's "digital footprints" for marketing analysis, violating these new protections.

Furthermore, as a federal employee working with the Department of Defense, I (Douglas) am acutely aware of the national security risks posed by establishing digital IDs and aggregated footprints for minors. These concerns are further underscored by the U.S. Government Accountability Office's recently published report (GAO-26-107492) detailing the dangers associated with aggregated data on U.S. personnel, to include family members/children.

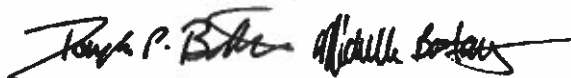
II. REQUEST FOR ACTION

Under Va. Code § 59.1-584, the Attorney General has the exclusive authority to provide Respondents with written notice of these violations. We respectfully request that your office:

1. **Investigate** the collusion between the tournament organizers (RCX, FFL) and the data brokers (NSID, Zorts).
2. **Coordinate** with the FTC (Case No. 197601895) to ensure state and federal privacy protections are being enforced in tandem.
3. **Issue a Notice of Violation** to the Respondents, initiating the statutory 30-day cure period.
4. **Seek Civil Penalties** of up to \$7,500 per violation if the Respondents fail to implement a permanent, non-digital opt-out for Virginia families.

The safety of Virginia's children should not be the admission price for youth sports. We have enclosed our full federal complaint and evidentiary exhibits for your review, and we look forward to your prompt attention to this matter.

Sincerely,



Douglas Bottoms and Michelle Bottoms

Enclosures:

- Full Complaint & Statement of Facts (as filed with the FTC)
- Exhibit List & Evidentiary Attachments

