



## MEMORANDUM

TO: Committee on Court Administration and Case Management

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RE: Exploratory Analysis of Unredacted Home Addresses in Federal Court PACER Criminal Proceedings Documents

Appellate Rule 25(a)(5), Bankruptcy Rule 9037, Civil Rule 5.2, and Criminal Rule 49.1 require parties and nonparties to redact personally identifiable information in documents they file with the federal courts. Specifically, filers must redact social security numbers (SSNs), individual taxpayer identification numbers, birthdates, minors' names, and financial account numbers. Criminal Rule 49.1 and Appellate Rule 25(a)(5) further require filers to redact all but the city and state of individuals' home addresses.

In April 2024, at the request of the Committee on Court Administration and Case Management (CACM), the Federal Judicial Center (Center) completed the study, *Unredacted Social Security Numbers in Federal Court PACER Documents*, which reports the number of unredacted SSNs and taxpayer identification numbers found in nearly 4.7 million federal court PACER documents filed on 37 days in 2022.<sup>1</sup>

CACM also asked the Center to examine the presence of home addresses in federal court criminal and appellate proceedings. This memorandum outlines our method and includes estimates of the prevalence of individuals' home addresses.

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<sup>1</sup> To construct the sample, we randomly selected 37 dates in calendar year 2022 and downloaded all documents filed in the federal district, bankruptcy, and appeals courts on those days. Although the number of documents in our sample was substantial, the number of primary sampling units—37 days—is small from a statistical perspective, which limits the generalizability of our findings. Consequently, we restrict our conclusions regarding the prevalence of personally identifiable information to the 37 days in 2022 that we analyzed. We encourage readers to interpret our findings within this context.

## Search Method

Determining whether an address is a home address or some other type of address generally required more manual review, research, and interpretation than was needed in our previously completed analyses of SSNs and birthdates. For this reason, it was necessary to work with a smaller set of documents. To this end, we randomly selected 10,000 documents from our collection of 484,203 criminal district court PACER documents and 10,000 documents from our collection of 41,326 criminal appeals court PACER documents to search for home addresses. The percentages we report in this memorandum are therefore estimates based on random samples rather than on the entire collection of documents that we analyzed in our previous studies of SSNs and birthdates.

We began by writing an algorithm to search the documents for strings that contain the basic elements of street addresses.<sup>2</sup> Specifically, we defined a street address as a house number, a street name, and a street suffix, such as “Avenue,” “Road,” and “Street.” Street names were case insensitive and could contain between one and three words, as in 123 Main Street, 123 West Main Street, and 123 Old West Main Street. Street names could also include numbers written as numerals or words—for example, 300 9th Avenue and 300 Ninth Avenue. Cardinal directions could appear interchangeably as initials or words, as in 98 S. Market Blvd. and 98 South Market Blvd. Street suffixes were also case insensitive and could appear spelled out or abbreviated, with or without a period (e.g., Street, St., St).<sup>3</sup>

Our initial search yielded 33,316 possible addresses. We then used keyword searches to filter out thousands of irrelevant strings<sup>4</sup> and nonresidential addresses associated with law firms, courthouses, and government buildings.<sup>5</sup> After eliminating irrelevant strings and nonresidential

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<sup>2</sup> We considered searching for home addresses using a list of addresses, but to our knowledge, there is not a comprehensive list of home addresses in the United States that is readily available for research purposes. *See, e.g.,* U.S. Dep’t of Transp., National Address Database (NAD) Disclaimer, U.S. Dep’t of Transp., <https://www.transportation.gov/mission/open/gis/national-address-database/national-address-database-nad-disclaimer> (last visited Sept. 11, 2025).

<sup>3</sup> The full list of street suffixes and abbreviations we used are as follows: Street, St, Avenue, Ave, Road, Rd, Boulevard, Blvd, Drive, Dr, Lane, Ln, Way, Circle, Cir, Court, Ct, Terrace, Terr, Place, Pl, Highway, Hwy, Parkway, Pkwy, Crescent. Suffixes could appear fully capitalized. Abbreviations could be followed by a period.

<sup>4</sup> After inspecting hundreds of examples, we found that certain strings that conformed to our address pattern were actually Supreme Court case citations (e.g., “137 S. Ct.”) or irregular sentence fragments that included the terms “Court” (e.g., “7 As the Court”) and “Cir” (e.g., “39 and 11<sup>th</sup> Cir”). We thus eliminated any hit that contained the following: “The Court”, “the Court”, “A Court”, “a Court”, “to Court”, “in Court”, “of Court”, “this Court”, “This Court”, “that Court”, “That Court”, “District Court”, “Supreme Court”, “in Federal Court”, “S. Ct.”, “S. Ct”, “S Ct”, “First Cir”, “Second Cir”, “Third Cir”, “Fourth Cir”, “Fifth Cir”, “Sixth Cir”, “Seventh Cir”, “Eighth Cir”, “Ninth Cir”, “Tenth Cir”, “Eleventh Cir”, “1st Cir”, “2nd Cir”, “3rd Cir”, “4th Cir”, “5th Cir”, “6th Cir”, “7th Cir”, “8th Cir”, “9th Cir”, “10th Cir”, “11th Cir”, “1 st Cir”, “2 nd Cir”, “3 rd Cir”, “4 th Cir”, “5 th Cir”, “6 th Cir”, “7 th Cir”, “8 th Cir”, “9 th Cir”, “10 th Cir”, “11 th Cir”, “00 AM in”, “30 AM in”, “00 PM in”, “30 PM in”.

<sup>5</sup> After inspecting hundreds of nonresidential addresses in context, we determined that we could filter out addresses that appeared within two lines of any of the following terms: “& Associates”, “Address of Business”, “Appeals Bureau”, “Attorney”, “Attorney’s Office”, “Bar #”, “Bar No”, “Bar Number”, “Business Address”, “Clerk of Court”, “Clerk of the Court”, “Clerk’s Office”, “Consul General of Mexico”, “Counsel for”, “Court House”, “Court Reporter”, “Court of Appeals”, “Courthouse”, “Courtroom Services”, “Criminal Division”, “Defendant’s attorney”, “Defendant’s counsel”, “Defender’s Office”, “Department of Justice”, “District Clerk”, “District Court”, “Eastern

addresses, 7,121 possible addresses remained. Two researchers independently examined each of the 7,121 possible addresses in context, reading sections of the documents to determine which were individuals' home addresses.

In general, we considered individuals' home addresses to be houses and apartments identified by at least a number and a street name. The research team labeled any residential street address with the city and state as a full unredacted home address and any residential street address without a city and state as a partial unredacted home address. Researchers also labeled more general references to blocks (e.g., "100 block of Main Street") as partial unredacted home addresses, whether or not the city and state was included. If the two researchers assigned to each address made different determinations, the disagreement was reconciled by a senior member of the research team.

We counted the addresses of hotels, shelters, and reentry centers as home addresses only when the documents suggested that a particular individual was residing there.<sup>6</sup> We did not count the addresses of prisons as home addresses due to the position of multiple circuits that "the domicile of the prisoner before he was imprisoned is presumed to remain his domicile while he is in prison."<sup>7</sup>

Once we had a final list of unredacted home addresses, two researchers analyzed the document in which each address was found. If an address was exempt from the rules, researchers noted the reason. They also noted when unrepresented litigants filed their own home addresses, suggesting a waiver of privacy protections. If the two researchers made different determinations about an address, the disagreement was again reconciled by a senior member of the research team.

## Results

Table 1 shows the number of documents we found to contain individuals' home addresses. The counts are disaggregated by court type. In total, we found unredacted home addresses in 267 of the 10,000 district court documents and 276 of the 10,000 appeals court documents. We thus estimated that 2.7% of the sampled district court documents and 2.8% of the sampled appeals court documents contained unredacted home addresses. Eighty-nine percent of these documents

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Division", "Esq.", "Federal Bldg", "Federal Building", "Federal Defender", "Federal Defenders Organization", "Federal Office Building", "Federal Public Defender", "Henry Building", "LLC", "LLP", "Law Firm", "Law Group", "Law Office", "Law, PA", "Law, PC", "Litigation Division", "Mail Stop", "Magistrate Court", "Marshal Service", "Marshals Service", "Medical Center", "Office of the Clerk", "Office of the Public Defender", "P.A.", "P.C.", "P.L.C.", "P.L.L.C.", "P.L.L.P.", "PLLC", "PLLP", "P. O. BOX", "P. O. Box", "PO BOX", "P.O. BOX", "P.O. Box", "P.o, Box", "Post Office Box", "Pretrial Services", "Probation Office", "Probation Officer", "Prosecutor's Office", "Realtime Reporter", "Russell Building", "Service Center", "Services Center", "State Court", "Ste.", "Suite", "Superior Court", "T-Mobile Wireless", "U.S. Atty", "United States District Judge", "United States Magistrate Judge", "Veteran's Affairs", "Western Division".

<sup>6</sup> For example, we counted the address of a men's shelter because a booking arrest report listed it as the defendant's address at the time of arrest. Had the address of the men's shelter appeared in a context that did not reference a particular individual, we would not have counted it.

<sup>7</sup> *Sullivan v. Freeman*, 944 F.2d 334 (7th Cir. 1991); see also *Stifel v. Hopkins*, 477 F.2d 1116 (6th Cir. 1973); *Hall v. Curran*, 599 F.3d 70 (1st Cir. 2010).

contained at least one full address—i.e., a house number, a street, and a city and state. The remainder contained only partial addresses.

*Table 1. Prevalence of Unredacted Home Addresses in Criminal Documents*

Court Type	Documents Analyzed	Documents with Home Addresses	% Documents with Home Addresses
District Courts	10,000	267	2.7%
Appeals Courts	10,000	276	2.8%

*Prevalence estimated from random samples of documents (margin of error +/-0.3%)*

From our manual review of the documents, we observed that unredacted home addresses often appeared in the context of property forfeitures, exhibit lists, evidence lists, and discovery indices. These documents might specify where assets or financial records were located, where law enforcement conducted surveillance, where crimes occurred, and where items such as firearms and narcotics were seized. Home addresses also commonly appeared in transcripts from trials and hearings; for example, in the context of attorneys describing the facts of cases, or law enforcement officers testifying about the steps in an investigation. We also observed home addresses in Certificates of Service and below the signature line in letters of support submitted by defendants’ family members and friends. We observed the home addresses of pro se litigants in case captions alongside attorneys’ addresses and below their signatures in documents they filed with the court.

Among the documents found to contain unredacted home addresses, 70% contained one unique address and 23% contained between 2 and 4 different addresses. In the rare instances in which more than a few different home addresses appeared in a document, the addresses tended to appear listed in forms, spreadsheets, or logs. For example, we found 14 different addresses in a document that contained numerous search warrant applications, 25 different addresses in a discovery index that listed various financial and property records, and 64 different addresses in an exhibit that listed properties that were advertised on a real estate company’s website.

Table 2 shows the percentage of the unredacted home addresses we found that appeared to be noncompliant with the privacy rules or exempt from redaction under the rules. We also noted the percentage of home addresses that belonged to pro se litigants who waived privacy protections.

*Table 2. % Home Addresses by Noncompliant, Exempt, and Protections Waived*

Court Type	Home Addresses Found	% Noncompliant with rules	% Exempt from rules	% Protections waived
District Courts	756	63%	32%	5%
Appeals Courts	1,766	78%	14%	8%

In total, we found 756 unredacted home addresses in the district court documents we analyzed and 1,766 in the appeals court documents. Sixty-three percent of the home addresses in the district court documents and 78% of the home addresses in the appeals court documents appeared to be noncompliant with the privacy rules. Of the 32% of district court addresses that were exempt, almost all appeared in charging documents and affidavits, arrest and search warrants, and criminal investigations or other documents prepared prior to filing of a criminal charge. Of the 14% of appeals court addresses that were exempt, about a third appeared in state court documents, and the remainder appeared in charging documents, affidavits, warrants, and investigations.