TCPA LITIGATION TRENDS 2025 YEAR IN REVIEW

A Comprehensive Analysis for Telemarketing Compliance Professionals

February 2026

Contents

Executive Summary

TCPA litigation surged 60.1% in 2025, reaching 2,628 cases and creating unprecedented compliance challenges for telemarketing operations. This analysis identifies the key risk factors, emerging plaintiff patterns, and defensive strategies critical for compliance professionals by comparing case data from 2023-2025.

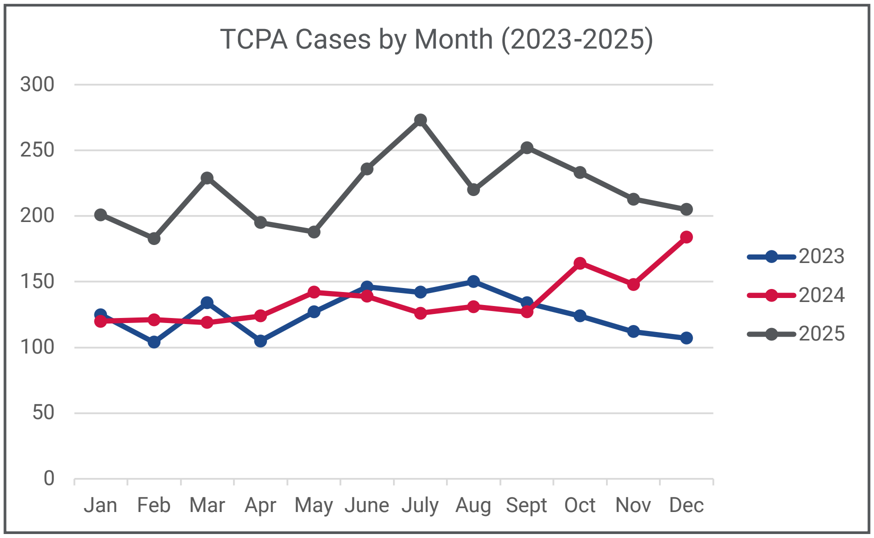
Key Findings:

- Serial Plaintiff (plaintiffs filing more than one TCPA suit in a year) Dominance: 397 serial plaintiffs (24.7% of all filers) drove 54.0% of 2025 litigation, filing an average of 3.6 cases each. The barrier to entry for the 25 most active plaintiffs rose 60%, from 5 cases needed in 2023 to 8 cases required to reach that group in 2025.
- Financial Services Under Siege: This industry represents 39.2% of all 2025 cases and accounts for 48.8% of defendants sued persistently across all three years. Financial Services defendants face compounding risk, once sued, they become prime targets for additional litigation.
- Geographic Consolidation: California absorbed a disproportionate share of growth, surging from 18.8% to 33.9% of national cases, now representing one-third of all TCPA litigation. Only 2 states increased their market share (CA and OR), while 35 remained stable and 6 declined, indicating extreme geographic concentration.
- Professional Plaintiff Infrastructure: The 5 most active law firms represent 45% of all 2025 litigation, with Gerald Lane alone handling 20.2% of cases (530 cases). This concentration suggests organized professional plaintiff bar driving systematic litigation campaigns.
- Two-Tier Plaintiff System: 88% of the 25 most active serial plaintiffs are targeting 4 or more industries with their filings, while all others are primarily limited to 2-3 industries. This pattern reveals strategic, sophisticated targeting by the frequent filers versus opportunistic behavior by smaller players.
- New Entrant Acceleration: 1,363 plaintiffs filed their first TCPA case in 2025, with 277 (20.3%) becoming serial filers, up 82% from 2024. Nine new entrants broke into the most active 25, demonstrating rapid professionalization of plaintiff operations.

I. Litigation Volume Trends

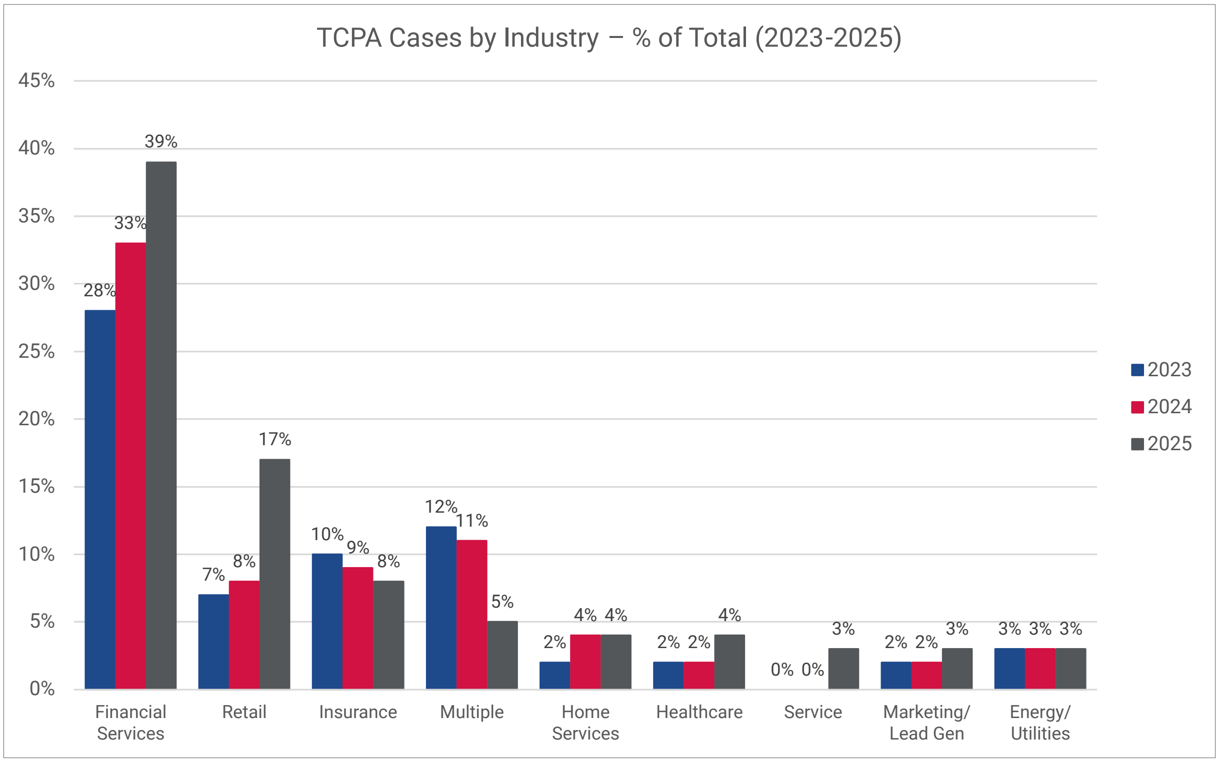
After a modest 9% increase in 2024, TCPA litigation experienced an unprecedented 60.1% surge in 2025.

- 2023: 1,506 cases
- 2024: 1,641 cases (+9.0%)
- 2025: 2,628 cases (+60.1%)



Industry Analysis

The following chart shows each defendant industry as a percentage of total cases for that year:



1. Financial Services: 1,029 cases (39.2% of total)
    - 2024: 547 cases
    - Growth: +88.1%
    - Three-year total: 1,992 cases

2. Retail: 453 cases (17.3% of total)
    - 2024: 128 cases
    - Growth: +253.9%
    - Three-year total: 681 cases

3. Insurance: 214 cases (8.1% of total)
    - 2024: 140 cases
    - Growth: +52.9%
    - Three-year total: 510 cases

II. Serial Plaintiff Analysis

The Serial Plaintiff Phenomenon

Serial plaintiffs (plaintiffs that have filed 2 or more TCPA cases) dominate TCPA litigation:

Year	Serial Plaintiffs	% of Plaintiffs	% of Cases
2023	230	25.1%	54.4%
2024	226	21.3%	49.2%
2025	397	24.7%	54.0%

Year-over-year data shows an increase in total repeat plaintiffs, as well as the most active plaintiffs filing more and more cases:

Tier (cases filed)	2023	2024	2025
Most Active (10+)	12 plaintiffs (15.5% of total cases)	17 plaintiffs (14.2% of total cases)	19 plaintiffs (12.8% of total cases)
High Volume (5-9)	16 plaintiffs (6.6% of total cases)	20 plaintiffs (7.7% of total cases)	47 plaintiffs (10.7% of total cases)
Moderate (3-4)	60 plaintiffs (13.5% of total cases)	57 plaintiffs (11.2% of total cases)	109 plaintiffs (13.5% of total cases)
Low Volume (2)	142 plaintiffs (18.9% of total cases)	132 plaintiffs (16.1% of total cases)	222 plaintiffs (16.9% of total cases)

New 2025 Entrants

1,363 plaintiffs filed their first TCPA case in 2025. Of these, 277 (20.3%) filed more than one case. This is up from 2024, where 152 of 896 (16.9%) new entrants filed multiple cases. 9 of the 2025 new entrants made the 25 most active TCPA plaintiff list for 2025.

- #4 - Bianca Johnston: 22 cases
- #7 - Bridget Botto: 16 cases
- #10 - Adean Hill: 14 cases
- #13 - Andrew Davalos: 13 cases
- #14 - Erin Wilson: 13 cases
- #17 - Manuel Juarez: 11 cases
- #22 - Jonathan Tu: 8 cases
- #23 - Marshall McClain: 8 cases
- #24 - William Redick: 8 cases

2024 Entrants - Performance Trajectory

Looking at the 896 entrants for 2024, 136 (15.2%) continued filing TCPA cases into 2025.

- First year (2024): average 2.3 cases
- Second year (2025): 3.2 cases
- Growth: +42%

25 Most Active Serial Plaintiffs of 2025

Barrier to entry for most active 25 is rising. Cases required:

- 2023: 5+ cases
- 2024: 7+ cases (+40%)
- 2025: 8+ cases (+60% from 2023)

Year	Most Active	5 Most Active	10 Most Active	25 Most Active*
2023	2.4%	8.9%	14.1%	22.0%
2024	1.1%	5.2%	9.3%	18.2%
2025	2.0%	5.6%	8.7%	14.6%

* The 25 most active includes ties

This escalating threshold to the most active repeat plaintiffs increased from 5 cases to 8 from 2023 to 2025, however the collective filings of these 25 fell by 7.4 percentage points, indicating that litigation power is dispersing across the rapidly expanding plaintiff population.

The following table shows the most active serial plaintiffs with 2025 activity, geographic concentration, and total historical cases. Most plaintiffs below tend to file in only one state, or a select few.

Plaintiff	Total Cases	2023	2024	2025	Primary State	Primary %	Second State	Second %	Total States
Chet Wilson	65	0	13	52	OR	40.0%	FL	10.8%	15
Brandon Callier	82	36	18	28	TX	95.1%	NC	2.4%	3
Nigel Lucombe	33	0	9	24	FL	100.0%			1
Bianca Johnston	22	0	0	22	CA	100.0%			1
Andrew Mcgonigle	32	0	11	21	VA	56.3%	FL	15.6%	9
Jan Pimentel	23	0	2	21	FL	100.0%			1
Bridget Botto	16	0	0	16	CA	100.0%			1
Mark Dobronski	50	21	13	16	MI	98.0%	MA	2.0%	2
Kevin Bachhuber	16	0	1	15	WI	93.8%	CA	6.3%	2
Adean Hill	14	0	0	14	TX	100.0%			1
Kelly Bland	22	0	9	13	TX	77.3%	IL	9.1%	5
Sara Taylor	16	0	3	13	GA	56.3%	MA	18.8%	4
Andrew Davalos	13	0	0	13	CA	100.0%			1
Erin Wilson	13	0	0	13	GA	92.3%	FL	7.7%	2
Mark Ortega	25	0	13	12	TX	100.0%			1
Leon Weingrad	30	2	17	11	PA	56.7%	OR	16.7%	4
Manuel Juarez	11	0	0	11	CA	100.0%			1
Jourey Newell	12	1	0	11	PA	83.3%	CT	8.3%	3
Erik Salaiz	54	28	16	10	TX	100.0%			1
Asher Bronstin	13	1	3	9	CA	23.1%	MA	7.7%	5
Joseph Friel	10	0	2	8	PA	100.0%			1
Jonathan Tu	8	0	0	8	CA	100.0%			1
Marshall Mcclain	8	0	0	8	MD	50.0%	CT	12.5%	5
William Redick	8	0	0	8	CA	100.0%			1
Kyle Rashley	15	0	7	8	FL	93.3%	MI	6.7%	2

Serial Plaintiff Industry Focus

The table below compares filing patterns of the 25 most active repeat plaintiffs compared to all other repeat plaintiffs, focusing on the industry of the defendants sued.

- Focused: percent of plaintiffs filing cases against defendants in one industry
- Limited: percent of plaintiffs filing cases against defendants in 2-3 industries
- Diversified: percent of plaintiffs filing cases against defendants in 4+ industries

Category	Year	Focused	Limited	Diversified	Avg # Ind
25 Most Active Plaintiffs	2023	7.10%	25.00%	67.90%	4.2
	2024	0.00%	24.00%	76.00%	4.9
	2025	0.00%	12.00%	88.00%	5.7

Category	Year	Focused	Limited	Diversified	Avg # Ind
All others	2023	42.10%	57.40%	0.50%	1.7
	2024	38.30%	59.20%	2.50%	1.8
	2025	39.20%	55.40%	5.40%	1.9

Overall, the 25 most active plaintiffs tend to file cases against defendants in any industry, whereas other lower volume plaintiffs typically stick to 1-3 industries when filing. Trends over time show a move towards defendant industry diversification in the other group.

III. Plaintiff Law Firm Analysis

5 Most Active Plaintiff Law Firms (2025)

1. Gerald Lane: 530 cases (20.2%)
    a. 512 (96.6%) cases were filed in CA
    b. Defendants named in cases are primarily in the Retail (199 cases, 37.5%) or Financial Service (173 cases, 32.6%)
2. Pro Se: 304 cases (11.6%)
    a. Volume of cases staying consistent, but percentage of overall cases halved since 2023
3. Zane Charles Hedaya: 192 cases (7.3%)
    a. Primarily focuses on FL (134 cases, or 69.8%) and NY (26 cases, or 13.5%)
4. Anthony Paronich: 153 cases (5.8%)
    a. Filings diversified among 21 states
5. Brett Bodie: 59 cases (2.2%)
    a. 100% of cases filed in CA
    b. Defendants are primarily in Financial Services (57 cases, 96.6%)

Year-Over-Year Firm Trends

This table tracks the evolution of the TCPA litigation landscape from 2023-2025, revealing dramatic market share shifts, the emergence of key new players, and accelerating industry consolidation.

Change represents the absolute number of cases added or lost between 2023 and 2025. This metric shows raw market impact, how many additional cases each firm contributed to (or subtracted from) total TCPA litigation volume. For example, Gerald Lane's +530 change means this single firm added 530 cases to the national total, representing the largest individual impact on case volume growth.

% Growth measures the rate of expansion relative to each firm's 2023 baseline. This percentage reveals scaling speed and helps compare firms of different sizes. A firm growing from 50 to 150 cases shows the same +100 change as one growing from 500 to 600 cases, but the former demonstrates +200% growth (tripling) versus the latter's +20% growth, revealing dramatically different expansion trajectories.

Law Firm	2023	2024	2025	Change	% Growth (2023 – 2025)
Gerald Lane	0	45	530	NEW	N/A
Pro Se	336	205	304	-32	-10%
Zane Charles Hedaya	0	86	192	NEW	N/A
Anthony Paronich	51	75	153	+102	+200%
Brett Bodie	19	48	59	+40	+210%
Christopher Chagas Gold	0	0	52	NEW	N/A
Andrew Shamis	28	27	50	+22	+79%
Avi Robert Kaufman	32	86	46	+14	+44%
Andrew Roman Perrong	0	38	45	NEW	N/A
Stefan Louis Coleman	26	33	36	+10	+38%

Gerald Lane's Explosive Emergence: From non-existent in 2023 to 530 cases in 2025 represents the single most significant structural shift in TCPA litigation. This firm alone now handles 20.2% of all 2025 cases with 96.6% of the cases in California.

Accelerating Consolidation: Pro Se representation declined from 336 cases (22.3% market share) in 2023 to 304 cases (11.6% market share) in 2025. This -10% contraction, combined with the rise of specialized plaintiff firms, indicates increased sophistication of the plaintiff bar and declining individual litigation.

New Entrant Wave: Four of the 10 most active firms in 2025 are new entrants since 2023 (Gerald Lane, Zane Charles Hedaya, Christopher Chagas Gold, Andrew Roman Perrong). This churn rate suggests low barriers to entry for plaintiff firms and potential for rapid change, yesterday's non-player can become tomorrow's most active.

Established Firm Trajectories: Among continuing firms, Anthony Paronich (+200%) and Brett Bodie (+210%) had the biggest increases, both more than tripling their 2023 TCPA suit volumes.

Law Firms & Serial Plaintiffs

This table reveals the operational models of major TCPA law firms by comparing two critical metrics: the percentage of their plaintiffs who are serial filers versus the percentage of their cases driven by those serial filers.

Serial Plaintiff % shows what proportion of a firm's plaintiff roster consists of repeat filers (2+ cases). A high percentage indicates the firm works with professional plaintiffs; a low percentage suggests continuous new plaintiff activity.

Serial Cases % reveals what share of the firm's total TCPA case volume comes from those serial plaintiffs. This metric exposes plaintiff "productivity", as serial filers typically generate disproportionately more cases than one-time plaintiffs.

The Gap Reveals Strategy: The difference between these two percentages demonstrates each firm's reliance on repeat filers. For example, Gerald Lane's 28.9% serial plaintiffs drive 54.9% of their TCPA cases, a +26 percentage point gap showing that while the firm relies on mostly new plaintiffs, serial filers generate double the volume. In contrast, Andrew Roman Perrong's 82.6% serial plaintiffs drive 91.1% of cases.

Law Firm	Cases	Plaintiffs	Serial	% of Plaintiffs Serial	Serial Cases%
Gerald Lane	530	336	97	28.8%	54.9%
Pro Se	304	156	73	46.8%	72.7%
Zane Charles Hedaya	192	143	44	30.8%	48.4%
Anthony Paronich	153	76	42	55.2%	77.7%
Brett Bodie	59	51	12	23.5%	33.9%
Christopher Chagas Gold	52	44	14	31.8%	42.3%
Andrew Shamis	50	50	5	10.0%	10.0%
Avi Robert Kaufman	46	30	19	63.3%	76.0%
Andrew Roman Perrong	45	23	19	82.6%	91.1%
Stefan Louis Coleman	36	24	8	33.3%	55.5%

IV. Repeat Defendant Analysis

In 2025, 247 defendants (11.1%) were sued multiple times.

Repeat Litigation by Industry

Industry	2023	2024	2025
Financial Services	52	64	116
Retail	10	14	39
Insurance	16	17	26
Home Services	5	8	9
Service	3	1	9
Healthcare	2	2	8
Automotive	0	2	5
Food & Beverage	1	0	5
Telecommunications	4	3	4

Defendants Sued All 3 Years

80 defendants were sued in 2023, 2024, and 2025. Industry breakdown reveals:

- Financial Services: 39 defendants (48.8%)
- Insurance: 17 defendants (21.2%)
- Telecommunications: 4 defendants (5.0%)
- Retail: 4 defendants (5.0%)
- Energy/Utilities: 3 defendants (3.8%)
- Other: 3 defendants (3.8%)
- All other industries: 10 defendants (12.5%)

Financial Services represents nearly half of all persistently sued defendants, with Insurance adding another 21%. Combined, these two industries account for 70% of defendants facing repeat litigation across all three years.

V. Geographic Analysis

Serial Plaintiff Geographic Patterns (2025 most active 25 plaintiffs)

- Highly Focused (90%+ filings in one state): 16 plaintiffs (64.0%)
- Focused (70-89% filings in one state): 2 plaintiffs (8.0%)
- Regional (case filings in 2-3 states): 0 plaintiffs (0.0%)
- Diversified (case filings in 4+ states): 7 plaintiffs (28.0%)

State-by-State with Serial Trending

Despite 32 states experiencing volume growth, only 2 states (California and Oregon) increased their percentage share of national cases. This indicates California is absorbing disproportionate growth, consolidating from 18.8% (2024) to 33.9% (2025) of all TCPA litigation nationwide.

- No cases: 7 states (and DC) saw no TCPA activity in 2025
- Decreasing: 6 states saw a decrease in the number of filings
- Consistent: 35 states stayed roughly the same
- Increasing: 2 states saw an increase in the number of filings

Below shows the 15 states with the most cases filed in 2025, along with the percentage that were filed by repeat plaintiffs.

State	2023	2024	2025	2024 Serial %	2025 Serial %	Serial Trend
CA	289	309	891	39.5%	49.5%	↑
FL	266	368	498	37.2%	53.0%	↑
TX	238	219	296	62.6%	56.8%	↓
IL	102	77	79	31.2%	41.8%	↑
GA	31	37	74	37.8%	56.8%	↑
NY	46	51	73	23.5%	28.8%	↑
PA	48	60	65	68.3%	55.4%	↓
MI	40	32	62	53.1%	50.0%	↓
OR	5	13	49	69.2%	77.6%	↑
NJ	12	23	42	30.4%	14.3%	↓
MO	46	47	38	66.0%	68.4%	↑
VA	24	22	32	50.0%	53.1%	↑
OH	37	28	31	25.0%	29.0%	↑
AZ	38	39	30	53.8%	16.7%	↓
WI	14	17	30	11.8%	46.7%	↑

Key State Insights

- California: Serial concentration rising from 43.4% (2024) to 49.5% (2025)
  - 2025: 891 cases, +188% growth year-over-year
  - Highest volume state (33.9% of national cases) with increasing serial concentration
- Florida: Serial concentration surging from 37.2% (2024) to 53.0% (2025)
  - 2025: 498 cases, +35% growth
  - Second highest volume state with rapidly INCREASING serial plaintiff activity
- Texas: Serial concentration declining from 62.6% (2024) to 56.8% (2025)
  - 2025: 296 cases, +35% growth
  - Still dangerous: 56.8% serial concentration despite decline
- Oregon: Serial concentration holding at 69.2% (2024) to 77.6% (2025)
  - Chet Wilson alone represents 38.0% of ALL Oregon cases
  - Extreme concentration: Single plaintiff drives state's high serial percentage
- Michigan: Serial concentration stable from 57.6% (2024) to 58.5% (2025)
  - 2025: 62 cases, +94% growth

VI. Conclusion

The 2025 data reveals a TCPA litigation landscape that demands proactive, strategic responses beyond traditional reactive defense:

1. Proactive Plaintiff Monitoring

With 397 serial plaintiffs driving majority litigation, utilizing professional plaintiff suppression lists is no longer optional, it's essential to defense infrastructure. Track not just names but filing patterns, preferred venues, attorney relationships, and industry targeting strategies. The 60% increase to meet the 25 most active plaintiffs threshold reflects the overall increase in litigation.

2. Geographic Risk Stratification

California's 49.5% serial concentration, Florida's 53.0%, and Texas's 56.8% demand state-specific compliance strategies. Companies operating in these jurisdictions should implement enhanced call recording, consent documentation, and DNC scrubbing protocols. Oregon's extreme concentration (77.6%, with Chet Wilson alone representing 38% of state cases) requires dedicated monitoring.

3. Industry-Specific Vigilance

Financial Services companies face 2x baseline risk, representing 39% of all cases and 49% of persistently sued defendants. Insurance (21.2% of persistent defendants) and Retail (254% growth) require immediate compliance audits. The fact that 70% of defendants sued all three years analyzed are in Financial Services or Insurance indicates systematic, repeated targeting of these sectors.

4. First-Lawsuit Response Protocol

The data shows clear "blood in water" effects: 247 defendants (11.1%) were sued multiple times in 2025 alone, while 80 faced litigation across all three years analyzed. The initial lawsuit should trigger comprehensive compliance review, not just case-specific defense. Companies must assume that one lawsuit likely leads to more.

5. Evolving Plaintiff Strategies

Serial plaintiffs are becoming more sophisticated:

- Average cases per serial plaintiff holds steady at 3.6, but total serial plaintiffs surged 76%
- The 25 most active plaintiffs are 88% diversified across industries (vs 55% limited for others)
- New entrants who become serial filers tend to grow 40% in their second year
- Law firm concentration (45% of cases with just 5 firms)

Defense strategies must evolve beyond reactive response to proactive risk mitigation. The 2025 surge represents not just increased volume, but fundamental transformation in plaintiff sophistication and organizational capacity.

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