



United States of America  
FEDERAL TRADE COMMISSION  
East Central Region

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Jon Miller Steiger  
Director

May 10, 2022  
*Via Federal Express*

Callvox LLC  
c/o Julia Marques, Registered Agent  
247 Water Street, Suite 4  
Brooklyn, NY 11201

**Warning Regarding Assisting and Facilitating Illegal Robocalls**

We have determined that Callvox LLC is apparently routing and transmitting illegal robocall traffic, directly or indirectly, for entities involved in the following campaigns:

- Social Security Administration imposter
- U.S. Customs and Border Protection imposter
- PayPal imposter
- Amazon imposter
- AT&T/DirecTV imposter
- Microsoft imposter
- Marriott Hotels and Hilton Hotels imposter
- Utility disconnection
- Credit card interest rate reduction

More specifically, our investigation revealed that Callvox LLC apparently routed and transmitted illegal robocalls, as set forth in Attachment A.

The Federal Trade Commission (FTC) works closely with USTelecom's Industry Traceback Group (ITG), which is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks.<sup>1</sup> Between January 21, 2021, and January 14, 2022, ITG investigated 43 prerecorded voice message calls that law enforcement, voice service providers using honeypots (i.e., unassigned numbers held by providers to detect illegal robocalls), and customers of YouMail had flagged as illegal robocalls made without consent of the called party.<sup>2</sup> ITG conducted tracebacks and determined that Callvox LLC routed and transmitted the calls. ITG previously notified you of these calls and provided you access to supporting data identifying

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<sup>1</sup> See Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274, Sec. 13(d) (2019) (TRACED Act).

<sup>2</sup> See 16 C.F.R. § 310.4(b)(1)(v).

each call—including a recording of the illegal robocall—as indicated in Attachment A. Further, the numerous traceback notices directed to Callvox LLC indicate that you are apparently routing and transmitting illegal robocall traffic knowingly.

Callvox LLC’s activities described above may subject Callvox LLC to legal liability. This letter is to provide you with information about laws and regulations enforced by the FTC that may bear upon your business activities as a Voice over Internet Protocol (VoIP) service provider, including the activities described above.

The FTC, the nation’s consumer protection agency, enforces the Federal Trade Commission Act (FTC Act), 15 U.S.C. § 45 et seq., which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC also enforces the Telemarketing Sales Rule (TSR), 16 C.F.R. Part 310, which prohibits deceptive and abusive telemarketing practices. Section 310.3(b) of the TSR prohibits “assisting and facilitating” certain specified conduct.<sup>3</sup> Under that provision, it is unlawful for any person or entity to “provide substantial assistance or support to any seller or telemarketer when that person knows or consciously avoids knowing that the seller or telemarketer is engaged in any act or practice that violates Sections 310.3(a), (c), or (d), or Section 310.4 of this Rule.” These Sections prohibit, among others, the following conduct:

- Making a false or misleading statement to induce any person to pay for goods or services or to induce a charitable contribution (16 C.F.R. § 310.3(a)(4));
- Misrepresenting a seller or telemarketer’s affiliation with any government entity (16 C.F.R. § 310.3(a)(2)(vii));
- Transmitting false or deceptive caller ID numbers (16 C.F.R. § 310.4(a)(8));
- Initiating or causing the initiation of calls that deliver prerecorded messages,<sup>4</sup> unless the person called provided the seller express written permission to call (16 C.F.R. § 310.4(b)(1)(v)); and
- Initiating or causing the initiation of telemarketing calls to numbers listed on the National Do Not Call Registry, unless the person called provided express written permission to receive calls from the seller or the seller had an existing business relationship with the person called (16 C.F.R. § 310.4(b)(1)(iii)(B)).

The FTC can obtain civil penalties for TSR violations. Each illegal call is subject to a maximum civil penalty of \$46,517. *See* 16 C.F.R. § 1.98. In addition, a violation of the TSR is a violation of Section 5 of the FTC Act. *See* 15 U.S.C. §§ 6102(c), 57a(d)(3), 45(a). Accordingly, the FTC has authority to seek both preliminary and permanent injunctive relief to address TSR violations. *See* 15 U.S.C. § 53(b). The FTC may also seek the refund of money or payment of damages to address TSR violations. *See* 15 U.S.C. § 57b(b).

Combatting illegal telemarketing is a top priority for the FTC, with a special emphasis on halting illegal robocalls.<sup>5</sup> We want you to be aware that the FTC has, for example, brought

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<sup>3</sup> A copy of the TSR is attached as Attachment B.

<sup>4</sup> These calls are often referred to as “robocalls.”

<sup>5</sup> In fiscal year 2021, the FTC received more than 5 million complaints about unwanted calls,

assisting and facilitating claims against technology companies that knowingly provided software and servers used by illegal robocallers, even though these technology companies did not contract directly with the illegal robocallers. *See FTC v. James B. Christiano*, Case No. 8:18-cv-00936 (C.D. Cal. May 31, 2018).

We also bring to your attention that the FTC has sued VoIP service providers for allegedly violating the TSR. In *FTC v. Educare*, the FTC alleged that defendant Globex Telecom, Inc. assisted and facilitated telemarketers it knew, or consciously avoided knowing, were violating the TSR's prohibitions on calls delivering prerecorded messages. *See FTC v. Educare Centre Services, Inc.*, No. 3:19-cv-00196-KC (W.D. Tex. Dec. 3, 2019).<sup>6</sup> In September, 2020, Globex Telecom and its associates agreed to pay \$2.1 million to settle the FTC lawsuit, and Globex Telecom's former CEO and President was banned from telemarketing to the U.S. and was subject to a permanent court order.<sup>7</sup> Similarly, in *FTC v. Alcazar Networks, Inc.*, the FTC alleged that Alcazar Networks, Inc. and its founder and sole owner assisted and facilitated telemarketers responsible for tens of millions of illegal telemarketing calls, including robocalls and spoofed calls that displayed "911" as the caller ID. *See FTC v. Alcazar Networks Inc., et al.*, No. 6:20-cv-2200 (M.D. Fla. Dec. 3, 2020).<sup>8</sup> As part of their settlement with the FTC in January 2021, the defendants agreed to a permanent injunction that prohibits similar misconduct in the future and requires them to screen and monitor their customers, as well as imposing a monetary penalty.<sup>9</sup>

The FTC has business educational materials that can assist you in complying with the TSR. *See* <https://www.ftc.gov/tips-advice/business-center/guidance/complying-telemarketing-sales-rule>.

In addition to FTC regulations and the FTC's actions against providers of VoIP services, you should also be aware that the United States Department of Justice (DOJ), state attorneys general, and other agencies have brought civil actions against VoIP companies and their owners. In two cases, DOJ alleged that the defendants were committing and conspiring to commit wire fraud by knowingly transmitting robocalls that impersonated federal government agencies.<sup>10</sup> In August 2020, a federal district court entered a permanent court order barring the defendants from

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including more than 3.42 million robocall complaints. The FTC maintains an interactive Tableau Public web page that publishes details about do not call complaints on a quarterly basis. *See* <https://public.tableau.com/profile/federal.trade.commission#!/vizhome/DoNotCallComplaints/Maps>.

<sup>6</sup> A copy of the FTC's Amended Complaint is attached as Attachment C.

<sup>7</sup> *See* <https://www.ftc.gov/news-events/press-releases/2020/09/globex-telecom-associates-will-pay-21-million-settling-ftcs-first>.

<sup>8</sup> A copy of the FTC's Complaint is attached as Attachment D.

<sup>9</sup> *See* <https://www.ftc.gov/news-events/press-releases/2020/12/ftc-takes-action-against-second-voip-service-provider>.

<sup>10</sup> *See* <https://www.justice.gov/opa/pr/department-justice-files-actions-stop-telecom-carriers-who-facilitated-hundreds-millions>.

conveying telephone calls into the U.S. telephone system.<sup>11</sup> State cases have had similar impacts.<sup>12</sup>

We hope you will review this letter and the attached materials in detail. Please direct any inquiries regarding this letter to FTC attorney Fil Maria de Banate by email at [fdebanate@ftc.gov](mailto:fdebanate@ftc.gov) or by telephone at 216.263.3413.

Sincerely,

/s/ Jon Miller Steiger

**JONATHAN  
STEIGER**

Digitally signed by  
JONATHAN STEIGER  
Date: 2022.05.09 14:01:52  
-04'00'

Jon Miller Steiger  
Director

Enclosures:

Attachment A (Chart of illegal robocalls)

Attachment B (TSR)

Attachment C (*Educare* Amended Complaint)

Attachment D (*Alcazar* Complaint)

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<sup>11</sup> See <https://www.justice.gov/opa/pr/district-court-enters-permanent-injunction-shutting-down-telecom-carriers-who-facilitated>.

<sup>12</sup> For example, the Vermont and Michigan Attorneys General have brought successful actions against VoIP providers who route scam robocall traffic. See <https://ago.vermont.gov/blog/2021/04/28/attorney-general-donovan-announces-settlement-with-scam-robocall-carrier/>; [https://www.michigan.gov/documents/ag/Assurance\\_of\\_Voluntary\\_Compliance\\_-\\_All\\_Access\\_Telecom\\_FINAL\\_9-11-20\\_702047\\_7.pdf](https://www.michigan.gov/documents/ag/Assurance_of_Voluntary_Compliance_-_All_Access_Telecom_FINAL_9-11-20_702047_7.pdf), and, <https://www.michigan.gov/ag/0,4534,7-359--536108--s,00.html>.

# ATTACHMENT A

| <b>Date of ITG Notification</b> | <b>Date of Call</b> | <b>Caller ID</b> | <b>Description of Robocall Campaign</b> | <b>Link to Robocall Recording</b>   | <b>Potential Violation</b> |
|---------------------------------|---------------------|------------------|---|---|----------------------------|
| Jan 14, 2022                    | Jan 10, 2022        | 8709003693       | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/635541">https://portal.tracebacks.org/api/public/attachments/635541</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Dec 08, 2021                    | Dec 07, 2021        | 9407659114       | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/584753">https://portal.tracebacks.org/api/public/attachments/584753</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Dec 07, 2021                    | Dec 01, 2021        | 8143866233       | PayPal Imposter                         | <a href="https://portal.tracebacks.org/api/public/attachments/582998">https://portal.tracebacks.org/api/public/attachments/582998</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Nov 30, 2021                    | Nov 29, 2021        | 5135745889       | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/576039">https://portal.tracebacks.org/api/public/attachments/576039</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Nov 30, 2021                    | Nov 29, 2021        | 2152278453       | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/576038">https://portal.tracebacks.org/api/public/attachments/576038</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Nov 30, 2021                    | Nov 29, 2021        | 3043936709       | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/576035">https://portal.tracebacks.org/api/public/attachments/576035</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Nov 30, 2021                    | Nov 29, 2021        | 8643230278       | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/576032">https://portal.tracebacks.org/api/public/attachments/576032</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Nov 30, 2021                    | Nov 29, 2021        | 7133958251       | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/576029">https://portal.tracebacks.org/api/public/attachments/576029</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Nov 30, 2021                    | Nov 29, 2021        | 2567848722       | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/576022">https://portal.tracebacks.org/api/public/attachments/576022</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Nov 30, 2021                    | Nov 26, 2021        | 8083838809       | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/576021">https://portal.tracebacks.org/api/public/attachments/576021</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Nov 22, 2021                    | Nov 20, 2021        | 2022390873       | Utility Disconnection                   | <a href="https://portal.tracebacks.org/api/public/attachments/567529">https://portal.tracebacks.org/api/public/attachments/567529</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Nov 22, 2021                    | Nov 20, 2021        | 3018761508       | Utility Disconnection                   | <a href="https://portal.tracebacks.org/api/public/attachments/567528">https://portal.tracebacks.org/api/public/attachments/567528</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Nov 22, 2021                    | Nov 18, 2021        | 4107271218       | Utility Disconnection                   | <a href="https://portal.tracebacks.org/api/public/attachments/567520">https://portal.tracebacks.org/api/public/attachments/567520</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Nov 19, 2021                    | Nov 18, 2021        | 8184593962       | Amazon Imposter                         | <a href="https://portal.tracebacks.org/api/public/attachments/565726">https://portal.tracebacks.org/api/public/attachments/565726</a> | 16 C.F.R. § 310.4(b)(1)(v) |
| Nov 09, 2021                    | Nov 04, 2021        | 3376642951       | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/550663">https://portal.tracebacks.org/api/public/attachments/550663</a> | 16 C.F.R. § 310.4(b)(1)(v) |

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|--------------|--------------|------------|---|---|-------------------------------|
| Oct 15, 2021 | Oct 14, 2021 | 2817987530 | Utility Disconnection                   | <a href="https://portal.tracebacks.org/api/public/attachments/520015">https://portal.tracebacks.org/api/public/attachments/520015</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Oct 14, 2021 | Oct 13, 2021 | 8506519428 | Amazon Imposter                         | <a href="https://portal.tracebacks.org/api/public/attachments/516624">https://portal.tracebacks.org/api/public/attachments/516624</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Oct 06, 2021 | Oct 04, 2021 | 4436224034 | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/490965">https://portal.tracebacks.org/api/public/attachments/490965</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Oct 01, 2021 | Sep 29, 2021 | 8084359436 | Credit Card Interest Rate Reduction     | <a href="https://portal.tracebacks.org/api/public/attachments/484583">https://portal.tracebacks.org/api/public/attachments/484583</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Sep 20, 2021 | Sep 18, 2021 | 8337971835 | AT&T/DirecTV Imposter                   | <a href="https://portal.tracebacks.org/api/public/attachments/460581">https://portal.tracebacks.org/api/public/attachments/460581</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Sep 14, 2021 | Sep 13, 2021 | 4808811723 | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/447432">https://portal.tracebacks.org/api/public/attachments/447432</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Sep 15, 2021 | Sep 09, 2021 | 4245019250 | Microsoft Imposter                      | <a href="https://portal.tracebacks.org/api/public/attachments/444724">https://portal.tracebacks.org/api/public/attachments/444724</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Aug 30, 2021 | Aug 28, 2021 | 6823368252 | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/404481">https://portal.tracebacks.org/api/public/attachments/404481</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Aug 31, 2021 | Aug 25, 2021 | 4012477704 | Legal Enforcement Agency Imposter       | <a href="https://portal.tracebacks.org/api/public/attachments/392268">https://portal.tracebacks.org/api/public/attachments/392268</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Aug 18, 2021 | Aug 17, 2021 | 7742192071 | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/373780">https://portal.tracebacks.org/api/public/attachments/373780</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Aug 18, 2021 | Aug 17, 2021 | 8657892953 | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/373779">https://portal.tracebacks.org/api/public/attachments/373779</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Aug 18, 2021 | Aug 17, 2021 | 6618579725 | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/373774">https://portal.tracebacks.org/api/public/attachments/373774</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Aug 16, 2021 | Aug 07, 2021 | 6506250074 | Marriott Hotels Imposter                | <a href="https://portal.tracebacks.org/api/public/attachments/339829">https://portal.tracebacks.org/api/public/attachments/339829</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Aug 04, 2021 | Aug 02, 2021 | 8652069471 | Social Security Administration Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/316442">https://portal.tracebacks.org/api/public/attachments/316442</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Aug 04, 2021 | Jul 29, 2021 | 2028337500 | Utility Disconnection                   | <a href="https://portal.tracebacks.org/api/public/attachments/310553">https://portal.tracebacks.org/api/public/attachments/310553</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Aug 04, 2021 | Jul 29, 2021 | 2028337500 | Utility Disconnection                   | <a href="https://portal.tracebacks.org/api/public/attachments/310551">https://portal.tracebacks.org/api/public/attachments/310551</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |

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|--------------|--------------|------------|---|---|-------------------------------|
| Aug 04, 2021 | Jul 29, 2021 | 2028337500 | Utility Disconnection                       | <a href="https://portal.tracebacks.org/api/public/attachments/310549">https://portal.tracebacks.org/api/public/attachments/310549</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Jul 27, 2021 | Jul 23, 2021 | 9197820458 | U.S. Customs and Border Protection Imposter | <a href="https://portal.tracebacks.org/api/public/attachments/300557">https://portal.tracebacks.org/api/public/attachments/300557</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Jun 23, 2021 | Jun 10, 2021 | 9168573029 | Hilton Hotels Imposter                      | <a href="https://portal.tracebacks.org/api/public/attachments/196673">https://portal.tracebacks.org/api/public/attachments/196673</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| May 28, 2021 | May 27, 2021 | 7575774578 | Marriott Hotels Imposter                    | <a href="https://portal.tracebacks.org/api/public/attachments/162225">https://portal.tracebacks.org/api/public/attachments/162225</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| May 28, 2021 | May 27, 2021 | 8044078902 | Marriott Hotels Imposter                    | <a href="https://portal.tracebacks.org/api/public/attachments/162223">https://portal.tracebacks.org/api/public/attachments/162223</a> | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Mar 13, 2021 | Mar 11, 2021 | 2155271675 | Social Security Administration Imposter     | <a href="https://portal.tracebacks.org/api/public/attachments/66154">https://portal.tracebacks.org/api/public/attachments/66154</a>   | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Feb 17, 2021 | Feb 16, 2021 | 4802266708 | Apple Imposter                              | <a href="https://portal.tracebacks.org/api/public/attachments/57750">https://portal.tracebacks.org/api/public/attachments/57750</a>   | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Feb 19, 2021 | Feb 16, 2021 | 6054758951 | Credit Card Interest Rate Reduction         | <a href="https://portal.tracebacks.org/api/public/attachments/57715">https://portal.tracebacks.org/api/public/attachments/57715</a>   | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Feb 02, 2021 | Feb 02, 2021 | 9315371345 | Stay Safe Stay Home                         | <a href="https://portal.tracebacks.org/api/public/attachments/29483">https://portal.tracebacks.org/api/public/attachments/29483</a>   | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Jan 28, 2021 | Jan 21, 2021 | 8005775366 | AT&T/DirecTV Imposter                       | <a href="https://portal.tracebacks.org/api/public/attachments/28766">https://portal.tracebacks.org/api/public/attachments/28766</a>   | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Jan 28, 2021 | Jan 22, 2021 | 2053157896 | Social Security Administration Imposter     | <a href="https://portal.tracebacks.org/api/public/attachments/28743">https://portal.tracebacks.org/api/public/attachments/28743</a>   | 16 C.F.R.<br>§ 310.4(b)(1)(v) |
| Jan 21, 2021 | Jan 13, 2021 | 3038997343 | Stay Safe Stay Home                         | <a href="https://portal.tracebacks.org/api/public/attachments/28064">https://portal.tracebacks.org/api/public/attachments/28064</a>   | 16 C.F.R.<br>§ 310.4(b)(1)(v) |