



United States of America
FEDERAL TRADE COMMISSION
East Central Region

1111 Superior Avenue, Suite 200
Cleveland, Ohio 44114
(216) 263-3455

Jon Miller Steiger
Director

August 23, 2022

CEASE AND DESIST DEMAND

VIA EMAIL TO:
mikel@greatchoicetelecom.com

Great Choice Telecom LLC
c/o Mikel Quinn, President
9597 Jones Road, Suite 110
Houston, TX 77065

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

- Amazon imposter – authorized order
- Amazon imposter – suspicious charge
- Auto warranty
- Credit card interest rate reduction
- Government imposter – Customs and Border Protection
- Government imposter – Federal Reserve
- Government imposter – Social Security Administration
- DirecTV imposter – discount
- Law enforcement or legal action notice
- Medicare benefits
- Package delivery (Chinese language)
- Student loan forgiveness
- Utility provider imposter – disconnection

More specifically, our investigation revealed that Great Choice Telecom 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.¹ Between February 18, 2021 and July 7, 2022, ITG investigated 114 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.² ITG conducted tracebacks and determined that Great Choice Telecom LLC routed and transmitted the calls. ITG previously notified you of these calls and provided you access to supporting data identifying each call—including a recording of the illegal robocall—as indicated in Attachment A. Further, the numerous traceback notices directed to Great Choice Telecom LLC indicate that you are apparently routing and transmitting illegal robocall traffic knowingly. **IF YOU ARE ENGAGED IN THESE ACTIVITIES, THEN YOU MUST IMMEDIATELY CEASE AND DESIST FROM ENGAGING IN THEM.**

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.³ 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,⁴ 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

¹ *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).

² *See* 16 C.F.R. § 310.4(b)(1)(v).

³ A copy of the TSR is attached as Attachment B.

⁴ These calls are often referred to as “robocalls.”

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.⁵ We want you to be aware that the FTC has, for example, brought 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).⁶ 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.⁷ 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).⁸ 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.⁹

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

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

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

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


⁸ A copy of the FTC's Complaint is attached as Attachment D.

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

fraud by knowingly transmitting robocalls that impersonated federal government agencies.¹⁰ In August 2020, a federal district court entered a permanent court order barring the defendants from conveying telephone calls into the U.S. telephone system.¹¹ State cases have had similar impacts.¹²

Within three business days, please send a message to FTC attorney Fil Maria de Banate, via electronic mail at fdebanate@ftc.gov, certifying that Great Choice Telecom LLC has ceased engaging in the activities described above that may subject it to liability under the TSR or the FTC Act. Please direct any inquiries regarding this letter to Mr. de Banate by email or by telephone at 216.263.3413.

Sincerely,



Jon Miller Steiger
Director

Enclosures:

Attachment A (Chart of illegal robocalls)
Attachment B (TSR)
Attachment C (*Educare* Amended Complaint)
Attachment D (*Alcazar* Complaint)

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

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

¹² 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, and, <https://www.michigan.gov/ag/0,4534,7-359--536108--s,00.html>.

ATTACHMENT A

Date of ITG Notification	Date of Call	Caller ID	Robocall Campaign Identifier	Link to Robocall Recording	Potential Violation
7/7/2022	7/6/2022	7166237846	Amazon-SuspiciousCharge-P1	https://portal.tracebacks.org/api/public/attachments/948018	16 C.F.R. § 310.4(b)(1)(v)
6/30/2022	6/29/2022	8722449923	Amazon-SuspiciousCharge-P1	https://portal.tracebacks.org/api/public/attachments/940839	16 C.F.R. § 310.4(b)(1)(v)
6/24/2022	6/23/2022	8646687475	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/929968	16 C.F.R. § 310.4(b)(1)(v)
5/23/2022	5/20/2022	7703134039	Legal-Consequences	https://portal.tracebacks.org/api/public/attachments/868733	16 C.F.R. § 310.4(b)(1)(v)
5/17/2022	5/13/2022	5187180271	CCIRR-Expire	https://portal.tracebacks.org/api/public/attachments/855176	16 C.F.R. § 310.4(b)(1)(v)
5/16/2022	5/12/2022	5182089551	CCIRR-Expire	https://portal.tracebacks.org/api/public/attachments/855202	16 C.F.R. § 310.4(b)(1)(v)
5/16/2022	5/12/2022	5183040235	CCIRR-Expire	https://portal.tracebacks.org/api/public/attachments/855190	16 C.F.R. § 310.4(b)(1)(v)
5/16/2022	5/12/2022	5188035870	CCIRR-Expire	https://portal.tracebacks.org/api/public/attachments/855188	16 C.F.R. § 310.4(b)(1)(v)
5/16/2022	5/13/2022	5182150929	CCIRR-Expire	https://portal.tracebacks.org/api/public/attachments/855181	16 C.F.R. § 310.4(b)(1)(v)
5/16/2022	5/13/2022	5184031382	CCIRR-Expire	https://portal.tracebacks.org/api/public/attachments/855180	16 C.F.R. § 310.4(b)(1)(v)
5/16/2022	5/13/2022	5182141884	CCIRR-Expire	https://portal.tracebacks.org/api/public/attachments/855177	16 C.F.R. § 310.4(b)(1)(v)
5/11/2022	5/9/2022	8779251897	Discount-DirecTV50	https://portal.tracebacks.org/api/public/attachments/841764	16 C.F.R. § 310.4(b)(1)(v)

5/10/2022	5/9/2022	8443871925	Discount-DirecTV50	https://portal.tracebacks.org/api/public/attachments/841748	16 C.F.R. § 310.4(b)(1)(v)
5/10/2022	5/5/2022	2393993695	Chinese-PackageDelivery	https://portal.tracebacks.org/api/public/attachments/841722	16 C.F.R. § 310.4(b)(1)(v)
5/6/2022	5/5/2022	5187379049	Legal-Consequences	https://portal.tracebacks.org/api/public/attachments/836688	16 C.F.R. § 310.4(b)(1)(v)
5/6/2022	5/5/2022	5182141785	Legal-Consequences	https://portal.tracebacks.org/api/public/attachments/836680	16 C.F.R. § 310.4(b)(1)(v)
4/26/2022	4/25/2022	5184139514	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/823638	16 C.F.R. § 310.4(b)(1)(v)
4/26/2022	4/25/2022	5182150901	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/823634	16 C.F.R. § 310.4(b)(1)(v)
4/20/2022	4/19/2022	5187719461	Amazon-SuspiciousCharge-P1	https://portal.tracebacks.org/api/public/attachments/817220	16 C.F.R. § 310.4(b)(1)(v)
4/20/2022	4/19/2022	5187909249	Amazon-SuspiciousCharge-P1	https://portal.tracebacks.org/api/public/attachments/817207	16 C.F.R. § 310.4(b)(1)(v)
4/12/2022	4/11/2022	7868797914	LegalDept-Action-P1	https://portal.tracebacks.org/api/public/attachments/805662	16 C.F.R. § 310.4(b)(1)(v)
4/9/2022	4/6/2022	5863500457	Amazon-SuspiciousCharge-P1	https://portal.tracebacks.org/api/public/attachments/800135	16 C.F.R. § 310.4(b)(1)(v)
4/9/2022	4/6/2022	5182141490	Amazon-SuspiciousCharge-P1	https://portal.tracebacks.org/api/public/attachments/800134	16 C.F.R. § 310.4(b)(1)(v)
4/8/2022	4/5/2022	5187781538	Amazon-SuspiciousCharge	https://portal.tracebacks.org/api/public/attachments/800213	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	3/28/2022	4075721403	SSA-Suspended	https://portal.tracebacks.org/api/public/attachments/787204	16 C.F.R. § 310.4(b)(1)(v)

3/30/2022	3/29/2022	5184303533	Amazon-SuspiciousCharge-P1	https://portal.tracebacks.org/api/public/attachments/788973	16 C.F.R. § 310.4(b)(1)(v)
3/29/2022	3/25/2022	5184303078	SSA-Suspended	https://portal.tracebacks.org/api/public/attachments/787192	16 C.F.R. § 310.4(b)(1)(v)
3/24/2022	3/23/2022	5182141043	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/779099	16 C.F.R. § 310.4(b)(1)(v)
3/24/2022	3/23/2022	5187781752	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/779094	16 C.F.R. § 310.4(b)(1)(v)
3/24/2022	3/23/2022	5188063740	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/779090	16 C.F.R. § 310.4(b)(1)(v)
3/8/2022	3/6/2022	3234317510	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/735436	16 C.F.R. § 310.4(b)(1)(v)
2/4/2022	1/27/2022	6082969044	StudentLoan-ForgivenessCenter	https://portal.tracebacks.org/api/public/attachments/660789	16 C.F.R. § 310.4(b)(1)(v)
2/1/2022	1/27/2022	9014374734	StudentLoan-ForgivenessCenter	https://portal.tracebacks.org/api/public/attachments/660791	16 C.F.R. § 310.4(b)(1)(v)
2/1/2022	1/27/2022	9123611129	StudentLoan-ForgivenessCenter	https://portal.tracebacks.org/api/public/attachments/660786	16 C.F.R. § 310.4(b)(1)(v)
2/1/2022	1/25/2022	2027454901	StudentLoan-ForgivenessCenter	https://portal.tracebacks.org/api/public/attachments/660773	16 C.F.R. § 310.4(b)(1)(v)
2/1/2022	1/27/2022	5125432282	StudentLoan-ForgivenessCenter	https://portal.tracebacks.org/api/public/attachments/660768	16 C.F.R. § 310.4(b)(1)(v)
2/1/2022	1/25/2022	9254447574	StudentLoan-ForgivenessCenter	https://portal.tracebacks.org/api/public/attachments/660767	16 C.F.R. § 310.4(b)(1)(v)
2/1/2022	1/25/2022	7752183099	StudentLoan-ForgivenessCenter	https://portal.tracebacks.org/api/public/attachments/660764	16 C.F.R. § 310.4(b)(1)(v)

1/27/2022	1/26/2022	9013479181	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/651840	16 C.F.R. § 310.4(b)(1)(v)
1/27/2022	1/25/2022	5413683626	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/651815	16 C.F.R. § 310.4(b)(1)(v)
1/19/2022	1/18/2022	7209289723	StudentLoan-ForgivenessCenter	https://portal.tracebacks.org/api/public/attachments/640779	16 C.F.R. § 310.4(b)(1)(v)
1/19/2022	1/17/2022	2245883796	StudentLoan-ForgivenessCenter	https://portal.tracebacks.org/api/public/attachments/640777	16 C.F.R. § 310.4(b)(1)(v)
1/14/2022	1/13/2022	5415663189	Amazon-SuspiciousCharge-P1	https://portal.tracebacks.org/api/public/attachments/635443	16 C.F.R. § 310.4(b)(1)(v)
1/7/2022	1/4/2022	9403519589	SSA-Suspended	https://portal.tracebacks.org/api/public/attachments/622462	16 C.F.R. § 310.4(b)(1)(v)
1/7/2022	1/4/2022	9105937253	SSA-Suspended	https://portal.tracebacks.org/api/public/attachments/622461	16 C.F.R. § 310.4(b)(1)(v)
12/20/2021	12/17/2021	5028765634	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/608000	16 C.F.R. § 310.4(b)(1)(v)
12/20/2021	12/17/2021	2709945542	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/607999	16 C.F.R. § 310.4(b)(1)(v)
12/20/2021	12/17/2021	5028766472	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/607997	16 C.F.R. § 310.4(b)(1)(v)
12/20/2021	12/16/2021	6062844380	Amazon-SuspiciousCharge-P1	https://portal.tracebacks.org/api/public/attachments/605706	16 C.F.R. § 310.4(b)(1)(v)
12/19/2021	12/16/2021	7706889680	Amazon-SuspiciousCharge-P1	https://portal.tracebacks.org/api/public/attachments/605719	16 C.F.R. § 310.4(b)(1)(v)
12/17/2021	12/13/2021	6514247907	Amazon-SuspiciousCharge-P1	https://portal.tracebacks.org/api/public/attachments/605703	16 C.F.R. § 310.4(b)(1)(v)

12/16/2021	12/13/2021	5858572202	LegalNotice-Identity	https://portal.tracebacks.org/api/public/attachments/601882	16 C.F.R. § 310.4(b)(1)(v)
12/13/2021	12/10/2021	6082535863	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/594950	16 C.F.R. § 310.4(b)(1)(v)
12/13/2021	12/10/2021	9025268718	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/594943	16 C.F.R. § 310.4(b)(1)(v)
12/9/2021	12/7/2021	2283633833	LegalNotice-Identity	https://portal.tracebacks.org/api/public/attachments/587269	16 C.F.R. § 310.4(b)(1)(v)
12/9/2021	12/7/2021	4252472138	LegalNotice-Identity	https://portal.tracebacks.org/api/public/attachments/587268	16 C.F.R. § 310.4(b)(1)(v)
12/2/2021	11/29/2021	5152555406	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/576024	16 C.F.R. § 310.4(b)(1)(v)
11/30/2021	11/29/2021	8159292370	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/576036	16 C.F.R. § 310.4(b)(1)(v)
11/30/2021	11/29/2021	9015938807	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/576031	16 C.F.R. § 310.4(b)(1)(v)
11/30/2021	11/29/2021	3043928774	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/576030	16 C.F.R. § 310.4(b)(1)(v)
11/30/2021	11/29/2021	2547282665	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/576026	16 C.F.R. § 310.4(b)(1)(v)
11/30/2021	11/27/2021	2703642822	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/574729	16 C.F.R. § 310.4(b)(1)(v)
11/29/2021	11/27/2021	2033350155	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/574745	16 C.F.R. § 310.4(b)(1)(v)
11/29/2021	11/27/2021	6065590191	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/574728	16 C.F.R. § 310.4(b)(1)(v)

11/29/2021	11/22/2021	6018790960	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/568816	16 C.F.R. § 310.4(b)(1)(v)
11/23/2021	11/22/2021	9784662714	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/568840	16 C.F.R. § 310.4(b)(1)(v)
11/23/2021	11/22/2021	7323173890	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/568836	16 C.F.R. § 310.4(b)(1)(v)
11/23/2021	11/19/2021	5859782860	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/568834	16 C.F.R. § 310.4(b)(1)(v)
11/23/2021	11/22/2021	3348636281	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/568829	16 C.F.R. § 310.4(b)(1)(v)
11/23/2021	11/22/2021	9164294803	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/568828	16 C.F.R. § 310.4(b)(1)(v)
11/18/2021	11/11/2021	8632990800	Utility-30MinDisconnect	https://portal.tracebacks.org/api/public/attachments/557776	16 C.F.R. § 310.4(b)(1)(v)
11/16/2021	11/15/2021	5024822639	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/560654	16 C.F.R. § 310.4(b)(1)(v)
11/16/2021	11/11/2021	8504611652	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/557673	16 C.F.R. § 310.4(b)(1)(v)
11/15/2021	11/13/2021	7274432641	Utility-30MinDisconnect	https://portal.tracebacks.org/api/public/attachments/559158	16 C.F.R. § 310.4(b)(1)(v)
11/15/2021	11/11/2021	2672059488	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/557680	16 C.F.R. § 310.4(b)(1)(v)
11/13/2021	11/11/2021	8632990800	Utility-30MinDisconnect	https://portal.tracebacks.org/api/public/attachments/557775	16 C.F.R. § 310.4(b)(1)(v)
11/12/2021	11/11/2021	3303192430	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/557674	16 C.F.R. § 310.4(b)(1)(v)

11/4/2021	11/3/2021	6179052419	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/549506	16 C.F.R. § 310.4(b)(1)(v)
11/4/2021	11/3/2021	9413764668	Amazon-AuthorizeOrder	https://portal.tracebacks.org/api/public/attachments/549504	16 C.F.R. § 310.4(b)(1)(v)
11/1/2021	10/29/2021	2024841954	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/544713	16 C.F.R. § 310.4(b)(1)(v)
11/1/2021	10/29/2021	2319383715	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/544702	16 C.F.R. § 310.4(b)(1)(v)
10/29/2021	10/28/2021	4846723100	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/543078	16 C.F.R. § 310.4(b)(1)(v)
10/29/2021	10/28/2021	6789150418	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/543076	16 C.F.R. § 310.4(b)(1)(v)
10/29/2021	10/28/2021	4846756411	SSA-P1-TexasFraud (GovtImpers)	https://portal.tracebacks.org/api/public/attachments/543074	16 C.F.R. § 310.4(b)(1)(v)
10/29/2021	10/26/2021	3343442245	Legal-Consequences	https://portal.tracebacks.org/api/public/attachments/539383	16 C.F.R. § 310.4(b)(1)(v)
10/27/2021	10/26/2021	9548542208	Legal-Consequences	https://portal.tracebacks.org/api/public/attachments/539399	16 C.F.R. § 310.4(b)(1)(v)
10/27/2021	10/26/2021	2036681801	Legal-Consequences	https://portal.tracebacks.org/api/public/attachments/539381	16 C.F.R. § 310.4(b)(1)(v)
10/5/2021	10/4/2021	9545293739	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/491057	16 C.F.R. § 310.4(b)(1)(v)
10/5/2021	10/4/2021	9546544475	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/491055	16 C.F.R. § 310.4(b)(1)(v)
10/5/2021	10/4/2021	5027276386	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/491041	16 C.F.R. § 310.4(b)(1)(v)

9/30/2021	9/28/2021	2169052194	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/482012	16 C.F.R. § 310.4(b)(1)(v)
9/30/2021	9/28/2021	2169737736	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/482009	16 C.F.R. § 310.4(b)(1)(v)
9/30/2021	9/28/2021	6512428914	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/482008	16 C.F.R. § 310.4(b)(1)(v)
9/30/2021	9/28/2021	6016184133	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/482003	16 C.F.R. § 310.4(b)(1)(v)
9/30/2021	9/27/2021	5027737951	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/481995	16 C.F.R. § 310.4(b)(1)(v)
9/30/2021	9/27/2021	5024388909	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/481994	16 C.F.R. § 310.4(b)(1)(v)
9/17/2021	9/14/2021	4805606164	CBP-GovtImpers	https://portal.tracebacks.org/api/public/attachments/453389	16 C.F.R. § 310.4(b)(1)(v)
9/14/2021	9/13/2021	2024228211	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/447358	16 C.F.R. § 310.4(b)(1)(v)
9/14/2021	9/13/2021	4439006139	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/447350	16 C.F.R. § 310.4(b)(1)(v)
9/2/2021	8/25/2021	2149316277	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/392276	16 C.F.R. § 310.4(b)(1)(v)
8/26/2021	8/23/2021	9178981570	CBP-GovtImpers	https://portal.tracebacks.org/api/public/attachments/392301	16 C.F.R. § 310.4(b)(1)(v)
8/26/2021	8/25/2021	8473447518	Legal-Enforcement-Notice	https://portal.tracebacks.org/api/public/attachments/392274	16 C.F.R. § 310.4(b)(1)(v)
8/23/2021	8/21/2021	2199166637	Utility-30MinDisconnect	https://portal.tracebacks.org/api/public/attachments/382020	16 C.F.R. § 310.4(b)(1)(v)

8/23/2021	8/21/2021	9106754407	Utility-30MinDisconnect	https://portal.tracebacks.org/api/public/attachments/382018	16 C.F.R. § 310.4(b)(1)(v)
8/23/2021	8/21/2021	7203807802	Utility-30MinDisconnect	https://portal.tracebacks.org/api/public/attachments/382016	16 C.F.R. § 310.4(b)(1)(v)
8/23/2021	8/20/2021	9047792387	Utility-30MinDisconnect	https://portal.tracebacks.org/api/public/attachments/382012	16 C.F.R. § 310.4(b)(1)(v)
7/14/2021	7/12/2021	5413668655	FedReserv-Impers	https://portal.tracebacks.org/api/public/attachments/280167	16 C.F.R. § 310.4(b)(1)(v)
6/25/2021	6/24/2021	4058506352	Medicare-Ineligible	https://portal.tracebacks.org/api/public/attachments/242207	16 C.F.R. § 310.4(b)(1)(v)
4/20/2021	4/19/2021	6319373276	AutoWarranty-ExtendOrReinst	https://portal.tracebacks.org/api/public/attachments/102399	16 C.F.R. § 310.4(b)(1)(v)
4/8/2021	4/7/2021	3056026385	AutoWarranty-ExtendOrReinst	https://portal.tracebacks.org/api/public/attachments/93988	16 C.F.R. § 310.4(b)(1)(v)
3/10/2021	3/9/2021	5087876025	AutoWarranty-ExtendOrReinst	https://portal.tracebacks.org/api/public/attachments/65174	16 C.F.R. § 310.4(b)(1)(v)
3/5/2021	3/2/2021	4075737577	AutoWarranty-ExtendOrReinst	https://portal.tracebacks.org/api/public/attachments/63405	16 C.F.R. § 310.4(b)(1)(v)
3/2/2021	3/1/2021	3212942050	AutoWarranty-ExtendOrReinst	https://portal.tracebacks.org/api/public/attachments/63053	16 C.F.R. § 310.4(b)(1)(v)
2/18/2021	2/17/2021	8598986213	AutoWarranty-ExtendOrReinst	https://portal.tracebacks.org/api/public/attachments/58336	16 C.F.R. § 310.4(b)(1)(v)