



United States of America
FEDERAL TRADE COMMISSION
East Central Region

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Cleveland, Ohio 44114
(216) 263-3455

Jon Miller Steiger
Director

March 17, 2023

CEASE AND DESIST DEMAND

VIA EMAIL TO:
atlantaregulatory@claconnect1.com

DID Central, LLC
Dean Rogers, CEO
1309 Coffeen Avenue
Suite 1409
Sheridan, WY 82801
c/o Joe Solana, Registered Agent

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

- Amazon-AuthorizeOrder
- Amazon-SuspiciousCharge-P1
- Apple-iCloud-AccountBreached
- AutoWarrantyExtend
- AutoWarranty-Various-P2
- CashApp-Blocked
- CBP-GovtImpers
- Discount-Avail50%
- Grandparentscam
- Home Services-Clean Energy
- Insurance-FinalExpense-P1
- ISP/Cable/Wireless-Impers
- Legal-Enforcement-Notice
- SSA-CalltheSSA
- SSA-Impers
- SSA-KindlyPressOne
- SSA-P1-BenefitsCanceled (GovtImpers)
- SSA-P2Compromised
- SSA-Suspended-P2
- StudentLoan - New Changes

- Utility-30MinDisconnect

More specifically, our investigation revealed that DID Central, 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 8, 2021, and February 14, 2023, ITG investigated 46 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 DID Central, 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 DID Central, 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

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.”

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 \$50,120. *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.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

⁵ In 2022, the FTC received more than 2.7 million complaints about unwanted calls, including more than 1.61 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>.

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.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 attorneys Fil Maria de Banate and Christian M. Capece, via electronic mail at fdebanate@ftc.gov and ccapecce@ftc.gov, certifying that DID Central, 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 and Mr. Capece by email or by telephone at 216.263.3413 or 216.263.3419.

Sincerely,

JONATHAN
N STEIGER

Digitally signed by
JONATHAN STEIGER
Date: 2023.03.17
14:25:41 -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)

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/2022/08/02/vermont-joins-nationwide-anti-robocall-task-force>; <https://www.michigan.gov/ag/news/press-releases/2020/08/07/ag-nessel-announces-settlement-eliminating-telecom-carrier-responsible-for-illegal-robocalls>; https://www.michigan.gov/documents/ag/Assurance_of_Voluntary_Compliance_-_All_Access_Telecom_FINAL_9-11-20_702047_7.pdf.

ATTACHMENT A

Date of ITG Notification	Date of Call	Caller ID	Robocall Campaign Identifier	Link to Robocall Recording	Potential Violation
2/14/2023	2/13/2023	5308451242	ISP/Cable/Wireless-Impers	https://portal2.tracebacks.org/api/public/attachments/1237002	16 C.F.R. 310.4(b)(1)(v)
1/31/2023	1/30/2023	7195093804	Insurance-FinalExpense-P1	https://portal2.tracebacks.org/api/public/attachments/1221882	16 C.F.R. 310.4(b)(1)(v)
1/17/2023	1/16/2023	6316997071	Discount-Avail50%	https://portal2.tracebacks.org/api/public/attachments/1208904	16 C.F.R. 310.4(b)(1)(v)
1/17/2023	1/16/2023	4088212966	Discount-Avail50%	https://portal2.tracebacks.org/api/public/attachments/1208916	16 C.F.R. 310.4(b)(1)(v)
1/17/2023	1/16/2023	5033486196	Discount-Avail50%	https://portal2.tracebacks.org/api/public/attachments/1208917	16 C.F.R. 310.4(b)(1)(v)
11/29/2022	11/28/2022	6286679779	Amazon-SuspiciousCharge-P1	https://portal2.tracebacks.org/api/public/attachments/1153254	16 C.F.R. 310.4(b)(1)(v)
11/29/2022	11/28/2022	6286679863	Amazon-SuspiciousCharge-P1	https://portal2.tracebacks.org/api/public/attachments/1153265	16 C.F.R. 310.4(b)(1)(v)
11/29/2022	11/28/2022	5205809845	Amazon-SuspiciousCharge-P1	https://portal2.tracebacks.org/api/public/attachments/1153267	16 C.F.R. 310.4(b)(1)(v)
11/15/2022	11/14/2022	3304654180	Grandparentscam	https://portal2.tracebacks.org/api/public/attachments/1132342	16 C.F.R. 310.4(b)(1)(v)
10/19/2022	10/18/2022	7133922422	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/1084003	16 C.F.R. 310.4(b)(1)(v)
3/18/2022	3/14/2022	3257736607	CashApp-Blocked	https://portal2.tracebacks.org/api/public/attachments/767266	16 C.F.R. 310.4(b)(1)(v)
2/7/2022	2/3/2022	5126542077	SSA-KindlyPressOne	https://portal2.tracebacks.org/api/public/attachments/668457	16 C.F.R. 310.4(b)(1)(v)
2/7/2022	2/3/2022	8287453397	SSA-KindlyPressOne	https://portal2.tracebacks.org/api/public/attachments/668469	16 C.F.R. 310.4(b)(1)(v)
12/9/2021	12/7/2021	7082734133	AutoWarrantyExtend	https://portal2.tracebacks.org/api/public/attachments/587262	16 C.F.R. 310.4(b)(1)(v)

12/9/2021	12/7/2021	9735699685	AutoWarrantyExtend	https://portal2.tracebacks.org/api/public/attachments/587263	16 C.F.R. 310.4(b)(1)(v)
11/29/2021	11/26/2021	7199747940	Amazon-AuthorizeOrder	https://portal2.tracebacks.org/api/public/attachments/574722	16 C.F.R. 310.4(b)(1)(v)
11/24/2021	11/16/2021	6317080756	AutoWarranty-Various-P2	https://portal2.tracebacks.org/api/public/attachments/568980	16 C.F.R. 310.4(b)(1)(v)
11/23/2021	11/17/2021	9804147202	AutoWarranty-Various-P2	https://portal2.tracebacks.org/api/public/attachments/568965	16 C.F.R. 310.4(b)(1)(v)
11/23/2021	11/17/2021	6104326882	AutoWarranty-Various-P2	https://portal2.tracebacks.org/api/public/attachments/568977	16 C.F.R. 310.4(b)(1)(v)
11/16/2021	11/11/2021	8652955195	AutoWarrantyExtend	https://portal2.tracebacks.org/api/public/attachments/560751	16 C.F.R. 310.4(b)(1)(v)
11/16/2021	11/11/2021	2183511232	AutoWarrantyExtend	https://portal2.tracebacks.org/api/public/attachments/560758	16 C.F.R. 310.4(b)(1)(v)
11/12/2021	11/11/2021	6062066060	Amazon-AuthorizeOrder	https://portal2.tracebacks.org/api/public/attachments/557666	16 C.F.R. 310.4(b)(1)(v)
10/29/2021	10/18/2021	9549466162	Amazon-AuthorizeOrder	https://portal2.tracebacks.org/api/public/attachments/527893	16 C.F.R. 310.4(b)(1)(v)
10/20/2021	10/19/2021	8018829326	Amazon-AuthorizeOrder	https://portal2.tracebacks.org/api/public/attachments/527882	16 C.F.R. 310.4(b)(1)(v)
10/14/2021	10/13/2021	3136596578	Amazon-AuthorizeOrder	https://portal2.tracebacks.org/api/public/attachments/516605	16 C.F.R. 310.4(b)(1)(v)
10/8/2021	10/7/2021	5022139100	Amazon-AuthorizeOrder	https://portal2.tracebacks.org/api/public/attachments/500499	16 C.F.R. 310.4(b)(1)(v)
10/5/2021	10/4/2021	3867761476	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/491064	16 C.F.R. 310.4(b)(1)(v)
9/22/2021	9/21/2021	8055104529	SSA-KindlyPressOne	https://portal2.tracebacks.org/api/public/attachments/465613	16 C.F.R. 310.4(b)(1)(v)
9/21/2021	9/15/2021	2017661947	SSA-Suspended-P2	https://portal2.tracebacks.org/api/public/attachments/460624	16 C.F.R. 310.4(b)(1)(v)

9/21/2021	9/15/2021	9735512064	SSA-Suspended-P2	https://portal2.tracebacks.org/api/public/attachments/460629	16 C.F.R. 310.4(b)(1)(v)
9/21/2021	9/15/2021	8567123506	SSA-Suspended-P2	https://portal2.tracebacks.org/api/public/attachments/460645	16 C.F.R. 310.4(b)(1)(v)
9/21/2021	9/20/2021	6097329498	SSA-KindlyPressOne	https://portal2.tracebacks.org/api/public/attachments/463180	16 C.F.R. 310.4(b)(1)(v)
9/21/2021	9/20/2021	3176521152	SSA-KindlyPressOne	https://portal2.tracebacks.org/api/public/attachments/463186	16 C.F.R. 310.4(b)(1)(v)
9/17/2021	9/15/2021	2075174868	CBP-GovtImpers	https://portal2.tracebacks.org/api/public/attachments/453398	16 C.F.R. 310.4(b)(1)(v)
9/17/2021	9/16/2021	7166677178	SSA-P2Compromised	https://portal2.tracebacks.org/api/public/attachments/456143	16 C.F.R. 310.4(b)(1)(v)
9/14/2021	9/13/2021	6784618571	SSA-KindlyPressOne	https://portal2.tracebacks.org/api/public/attachments/447431	16 C.F.R. 310.4(b)(1)(v)
6/9/2021	6/8/2021	3239635615	Home Services-Clean Energy	https://portal2.tracebacks.org/api/public/attachments/188142	16 C.F.R. 310.4(b)(1)(v)
4/26/2021	4/23/2021	7756288429	StudentLoan - New Changes	https://portal2.tracebacks.org/api/public/attachments/111641	16 C.F.R. 310.4(b)(1)(v)
3/26/2021	3/17/2021	3462770043	SSA-Impers	https://portal2.tracebacks.org/api/public/attachments/77599	16 C.F.R. 310.4(b)(1)(v)
3/26/2021	3/17/2021	3462770043	SSA-Impers	https://portal2.tracebacks.org/api/public/attachments/77601	16 C.F.R. 310.4(b)(1)(v)
3/26/2021	3/17/2021	3462770045	SSA-Impers	https://portal2.tracebacks.org/api/public/attachments/77603	16 C.F.R. 310.4(b)(1)(v)
3/26/2021	3/19/2021	6099138713	SSA-Impers	https://portal2.tracebacks.org/api/public/attachments/77607	16 C.F.R. 310.4(b)(1)(v)
3/23/2021	3/19/2021	4085320899	SSA-P1-BenefitsCanceled (GovtImpers)	https://portal2.tracebacks.org/api/public/attachments/70642	16 C.F.R. 310.4(b)(1)(v)
3/15/2021	3/14/2021	4086948627	Apple-iCloud-AccountBreached	https://portal2.tracebacks.org/api/public/attachments/66973	16 C.F.R. 310.4(b)(1)(v)

2/11/2021	2/10/2021	7742830498	SSA-CalltheSSA	https://portal2.tracebacks.org/api/public/attachments/55582	16 C.F.R. 310.4(b)(1)(v)
2/8/2021	2/7/2021	5133831654	Apple-iCloud-AccountBreached	https://portal2.tracebacks.org/api/public/attachments/53951	16 C.F.R. 310.4(b)(1)(v)