



United States of America
FEDERAL TRADE COMMISSION
East Central Region

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Cleveland, Ohio 44114
(216) 263-3455

Jon Miller Steiger
Director

May 10, 2022
Via Federal Express

Whisl Telecom, LLC
c/o Corporation Service Company, Registered Agent
1090 Vermont Avenue, N.W.
Washington, DC 20005

Warning Regarding Assisting and Facilitating Illegal Robocalls

We have determined that Whisl Telecom, 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
- Law enforcement agency imposter
- Legal notice
- Amazon imposter
- Apple imposter
- Marriott Hotels imposter
- Credit card interest rate reduction
- Auto warranty

More specifically, our investigation revealed that Whisl 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 January 28, 2021 and January 15, 2022, ITG investigated 89 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 Whisl Telecom, LLC routed and transmitted the calls. ITG previously notified you of these calls and provided you access to supporting data

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).

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

Whisl Telecom, LLC’s activities described above may subject Whisl Telecom, 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.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 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

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

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

⁵ 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).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 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

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>.

¹⁰ *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.¹¹ State cases have had similar impacts.¹²

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 or by telephone at 216.263.3413.

Sincerely,

/s/ Jon Miller Steiger

**JONATHAN
STEIGER**

Digitally signed by JONATHAN
STEIGER
Date: 2022.05.09 14:23:14
-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)

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	Description of Robocall Campaign	Link to Robocall Recording	Potential Violation
Jan 15, 2022	Jan 10, 2022	8709003693	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/635541	16 C.F.R. § 310.4(b)(1)(v)
Jan 11, 2022	Jan 10, 2022	2202003719	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/630214	16 C.F.R. § 310.4(b)(1)(v)
Jan 11, 2022	Jan 10, 2022	2602504722	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/630211	16 C.F.R. § 310.4(b)(1)(v)
Jan 11, 2022	Jan 10, 2022	2602504722	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/630209	16 C.F.R. § 310.4(b)(1)(v)
Jan 11, 2022	Jan 10, 2022	8055104843	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/630207	16 C.F.R. § 310.4(b)(1)(v)
Jan 11, 2022	Jan 10, 2022	7866997516	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/630205	16 C.F.R. § 310.4(b)(1)(v)
Jan 11, 2022	Jan 10, 2022	2202003729	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/630203	16 C.F.R. § 310.4(b)(1)(v)
Jan 11, 2022	Jan 10, 2022	2602504769	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/630201	16 C.F.R. § 310.4(b)(1)(v)
Jan 11, 2022	Jan 10, 2022	2703985359	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/630200	16 C.F.R. § 310.4(b)(1)(v)
Dec 10, 2021	Dec 08, 2021	8029891890	Amazon Imposter	https://portal.tracebacks.org/api/public/attachments/591007	16 C.F.R. § 310.4(b)(1)(v)
Nov 19, 2021	Nov 17, 2021	6624580663	Amazon Imposter	https://portal.tracebacks.org/api/public/attachments/565712	16 C.F.R. § 310.4(b)(1)(v)
Nov 17, 2021	Nov 12, 2021	5179305151	Law Enforcement Agency Imposter	https://portal.tracebacks.org/api/public/attachments/562333	16 C.F.R. § 310.4(b)(1)(v)
Nov 13, 2021	Nov 11, 2021	2087554189	Amazon Imposter	https://portal.tracebacks.org/api/public/attachments/557672	16 C.F.R. § 310.4(b)(1)(v)
Oct 26, 2021	Oct 25, 2021	4016387563	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/537352	16 C.F.R. § 310.4(b)(1)(v)
Oct 26, 2021	Oct 25, 2021	5732734473	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/537344	16 C.F.R. § 310.4(b)(1)(v)

Oct 26, 2021	Oct 25, 2021	7746668682	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/537337	16 C.F.R. § 310.4(b)(1)(v)
Oct 26, 2021	Oct 25, 2021	4353953449	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/537335	16 C.F.R. § 310.4(b)(1)(v)
Oct 26, 2021	Oct 25, 2021	4243100554	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/537334	16 C.F.R. § 310.4(b)(1)(v)
Oct 26, 2021	Oct 25, 2021	4023134383	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/537329	16 C.F.R. § 310.4(b)(1)(v)
Oct 26, 2021	Oct 25, 2021	4157044852	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/537327	16 C.F.R. § 310.4(b)(1)(v)
Oct 26, 2021	Oct 25, 2021	5637238492	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/537325	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	3157649785	Law Enforcement Agency Imposter	https://portal.tracebacks.org/api/public/attachments/525244	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	5163961832	Legal Notice	https://portal.tracebacks.org/api/public/attachments/525243	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	6072944288	Legal Notice	https://portal.tracebacks.org/api/public/attachments/525236	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	2129166960	Legal Notice	https://portal.tracebacks.org/api/public/attachments/525229	16 C.F.R. § 310.4(b)(1)(v)
Oct 20, 2021	Oct 18, 2021	9172637853	Legal Notice	https://portal.tracebacks.org/api/public/attachments/525225	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	3477731206	Legal Notice	https://portal.tracebacks.org/api/public/attachments/525220	16 C.F.R. § 310.4(b)(1)(v)
Oct 20, 2021	Oct 18, 2021	4243100580	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525153	16 C.F.R. § 310.4(b)(1)(v)
Oct 20, 2021	Oct 18, 2021	2088740451	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525151	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	6787197941	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525149	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	3602260071	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525147	16 C.F.R. § 310.4(b)(1)(v)

Oct 19, 2021	Oct 18, 2021	9047855234	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525145	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	8506048580	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525141	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	9135381089	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525138	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	9202913769	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525137	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	3043640179	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525136	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	7472471876	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525135	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	4016387832	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525134	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	9047853917	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525133	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	9047853917	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525132	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	5744983169	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525129	16 C.F.R. § 310.4(b)(1)(v)
Oct 19, 2021	Oct 18, 2021	5342204008	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/525128	16 C.F.R. § 310.4(b)(1)(v)
Oct 13, 2021	Oct 12, 2021	2075590807	Legal Notice	https://portal.tracebacks.org/api/public/attachments/509708	16 C.F.R. § 310.4(b)(1)(v)
Oct 13, 2021	Oct 12, 2021	9287658601	Legal Notice	https://portal.tracebacks.org/api/public/attachments/509700	16 C.F.R. § 310.4(b)(1)(v)
Oct 13, 2021	Oct 12, 2021	9186122118	Legal Notice	https://portal.tracebacks.org/api/public/attachments/509689	16 C.F.R. § 310.4(b)(1)(v)
Oct 13, 2021	Oct 12, 2021	6094868234	Legal Notice	https://portal.tracebacks.org/api/public/attachments/509676	16 C.F.R. § 310.4(b)(1)(v)
Oct 13, 2021	Oct 12, 2021	2085375688	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/509616	16 C.F.R. § 310.4(b)(1)(v)

Oct 13, 2021	Oct 12, 2021	3854855272	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/509614	16 C.F.R. § 310.4(b)(1)(v)
Oct 13, 2021	Oct 12, 2021	2194913486	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/509610	16 C.F.R. § 310.4(b)(1)(v)
Oct 13, 2021	Oct 12, 2021	5342203955	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/509608	16 C.F.R. § 310.4(b)(1)(v)
Oct 14, 2021	Oct 12, 2021	3365518603	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/509603	16 C.F.R. § 310.4(b)(1)(v)
Oct 14, 2021	Oct 12, 2021	2085375515	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/509601	16 C.F.R. § 310.4(b)(1)(v)
Oct 13, 2021	Oct 12, 2021	4172610959	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/509600	16 C.F.R. § 310.4(b)(1)(v)
Oct 13, 2021	Oct 12, 2021	7472471870	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/509598	16 C.F.R. § 310.4(b)(1)(v)
Oct 14, 2021	Oct 12, 2021	2088740441	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/509597	16 C.F.R. § 310.4(b)(1)(v)
Oct 13, 2021	Oct 12, 2021	7866997233	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/509596	16 C.F.R. § 310.4(b)(1)(v)
Sep 23, 2021	Sep 20, 2021	8564245007	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/468425	16 C.F.R. § 310.4(b)(1)(v)
Sep 21, 2021	Sep 20, 2021	3133809356	Law Enforcement Agency Imposter	https://portal.tracebacks.org/api/public/attachments/463271	16 C.F.R. § 310.4(b)(1)(v)
Sep 21, 2021	Sep 20, 2021	7742719929	Law Enforcement Agency Imposter	https://portal.tracebacks.org/api/public/attachments/463267	16 C.F.R. § 310.4(b)(1)(v)
Sep 21, 2021	Sep 20, 2021	4018961933	Law Enforcement Agency Imposter	https://portal.tracebacks.org/api/public/attachments/463263	16 C.F.R. § 310.4(b)(1)(v)
Sep 16, 2021	Sep 15, 2021	6095355399	U.S. Customs and Border Protection	https://portal.tracebacks.org/api/public/attachments/453396	16 C.F.R. § 310.4(b)(1)(v)
Sep 15, 2021	Sep 14, 2021	2257721935	Law Enforcement Agency Imposter	https://portal.tracebacks.org/api/public/attachments/450349	16 C.F.R. § 310.4(b)(1)(v)
Sep 14, 2021	Sep 13, 2021	5054631701	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/447428	16 C.F.R. § 310.4(b)(1)(v)

Sep 08, 2021	Sep 07, 2021	7755276085	U.S. Customs and Border Protection	https://portal.tracebacks.org/api/public/attachments/435069	16 C.F.R. § 310.4(b)(1)(v)
Sep 07, 2021	Sep 03, 2021	6467215156	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/431124	16 C.F.R. § 310.4(b)(1)(v)
Sep 07, 2021	Sep 03, 2021	6313003174	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/431119	16 C.F.R. § 310.4(b)(1)(v)
Sep 07, 2021	Sep 03, 2021	4795614248	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/431117	16 C.F.R. § 310.4(b)(1)(v)
Sep 07, 2021	Sep 03, 2021	6419908786	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/431112	16 C.F.R. § 310.4(b)(1)(v)
Sep 07, 2021	Sep 03, 2021	5083142606	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/431108	16 C.F.R. § 310.4(b)(1)(v)
Aug 25, 2021	Aug 24, 2021	9722065922	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/387225	16 C.F.R. § 310.4(b)(1)(v)
Aug 25, 2021	Aug 24, 2021	7135879280	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/387224	16 C.F.R. § 310.4(b)(1)(v)
Aug 09, 2021	Aug 07, 2021	9494277290	U.S. Customs and Border Protection	https://portal.tracebacks.org/api/public/attachments/334382	16 C.F.R. § 310.4(b)(1)(v)
Jul 30, 2021	Jul 28, 2021	6619127768	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/310647	16 C.F.R. § 310.4(b)(1)(v)
Jul 13, 2021	Jul 12, 2021	5415348419	Credit Card Interest Rate Reduction	https://portal.tracebacks.org/api/public/attachments/274443	16 C.F.R. § 310.4(b)(1)(v)
Jul 07, 2021	Jul 06, 2021	7069815195	Auto Warranty	https://portal.tracebacks.org/api/public/attachments/260545	16 C.F.R. § 310.4(b)(1)(v)
Jul 07, 2021	Jul 06, 2021	7175849868	Auto Warranty	https://portal.tracebacks.org/api/public/attachments/260538	16 C.F.R. § 310.4(b)(1)(v)
Jun 07, 2021	Jun 03, 2021	9803521517	Auto Warranty	https://portal.tracebacks.org/api/public/attachments/179188	16 C.F.R. § 310.4(b)(1)(v)
Jun 02, 2021	Jun 01, 2021	6156896773	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/173845	16 C.F.R. § 310.4(b)(1)(v)
Apr 21, 2021	Apr 19, 2021	9738321131	Auto Warranty	https://portal.tracebacks.org/api/public/attachments/102406	16 C.F.R. § 310.4(b)(1)(v)

Apr 06, 2021	Apr 05, 2021	7044139318	Auto Warranty	https://portal.tracebacks.org/api/public/attachments/90397	16 C.F.R. § 310.4(b)(1)(v)
Mar 19, 2021	Mar 15, 2021	3218638597	Credit Card Interest Rate Reduction	https://portal.tracebacks.org/api/public/attachments/67730	16 C.F.R. § 310.4(b)(1)(v)
Mar 13, 2021	Mar 11, 2021	5126588569	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/66148	16 C.F.R. § 310.4(b)(1)(v)
Mar 12, 2021	Mar 11, 2021	3097389302	Social Security Administration Imposter	https://portal.tracebacks.org/api/public/attachments/66147	16 C.F.R. § 310.4(b)(1)(v)
Mar 11, 2021	Jan 18, 2021	5719504950	Marriot Hotels Imposter	https://portal.tracebacks.org/api/public/attachments/65635	16 C.F.R. § 310.4(b)(1)(v)
Mar 11, 2021	Jan 19, 2021	7034115487	Marriot Hotels Imposter	https://portal.tracebacks.org/api/public/attachments/65627	16 C.F.R. § 310.4(b)(1)(v)
Feb 24, 2021	Feb 22, 2021	3304334630	Apple Imposter	https://portal.tracebacks.org/api/public/attachments/60167	16 C.F.R. § 310.4(b)(1)(v)
Feb 21, 2021	Feb 18, 2021	8142679540	Apple Imposter	https://portal.tracebacks.org/api/public/attachments/58891	16 C.F.R. § 310.4(b)(1)(v)
Feb 17, 2021	Feb 16, 2021	2525456725	Apple Imposter	https://portal.tracebacks.org/api/public/attachments/57751	16 C.F.R. § 310.4(b)(1)(v)
Jan 28, 2021	Jan 28, 2021	5134070493	Stay Safe Stay Home	https://portal.tracebacks.org/api/public/attachments/29205	16 C.F.R. § 310.4(b)(1)(v)