



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:*  
*legal@akamgt.com*

AKA Management Inc.  
c/o Angela Williams, CEO  
1621 Central Avenue  
Cheyenne, WY 82001

We have determined that AKA Management Inc. 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
- Credit card interest rate reduction
- DirecTV imposter – discount
- Hilton Hotels imposter – complimentary stay
- Microsoft imposter – computer hijack
- Government imposter – Social Security Administration
- Law enforcement or legal action notice
- Tech support refund
- Utility provider imposter – disconnection

More specifically, our investigation revealed that AKA Management Inc. 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 6, 2021, and July 7, 2022, ITG investigated 76 prerecorded voice message calls that law enforcement, voice service providers using honeypots (i.e., unassigned numbers held by providers to detect illegal robocalls), and

---

<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).

customers of YouMail had flagged as illegal robocalls made without consent of the called party.<sup>2</sup> ITG conducted tracebacks and determined that AKA Management Inc. 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 AKA Management Inc. 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.<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

---

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

<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

---

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.

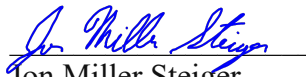
<sup>9</sup> *See* <https://www.ftc.gov/news-events/press-releases/2020/12/ftc-takes-action-against-second-voip-service-provider>.

<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>

Within three business days, please send a message to FTC attorney Fil Maria de Banate, via electronic mail at [fdebanate@ftc.gov](mailto:fdebanate@ftc.gov), certifying that AKA Management Inc. 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)

---

<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>Robocall Campaign Identifier</b>	<b>Link to Robocall Recording</b>	<b>Potential Violation</b>
7/7/2022	7/6/2022	2813522385	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/948024">https://portal.tracebacks.org/api/public/attachments/948024</a>	16 C.F.R. § 310.4(b)(1)(v)
7/7/2022	7/6/2022	8506373880	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/948020">https://portal.tracebacks.org/api/public/attachments/948020</a>	16 C.F.R. § 310.4(b)(1)(v)
6/27/2022	6/16/2022	8083888638	SSA-P1-TexasFraud (GovtImpers)	<a href="https://portal.tracebacks.org/api/public/attachments/929961">https://portal.tracebacks.org/api/public/attachments/929961</a>	16 C.F.R. § 310.4(b)(1)(v)
6/21/2022	6/18/2022	9549375001	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/924844">https://portal.tracebacks.org/api/public/attachments/924844</a>	16 C.F.R. § 310.4(b)(1)(v)
6/21/2022	6/18/2022	2054547672	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/924838">https://portal.tracebacks.org/api/public/attachments/924838</a>	16 C.F.R. § 310.4(b)(1)(v)
6/21/2022	6/17/2022	2067181883	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/924827">https://portal.tracebacks.org/api/public/attachments/924827</a>	16 C.F.R. § 310.4(b)(1)(v)
6/21/2022	6/17/2022	2083292074	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/924821">https://portal.tracebacks.org/api/public/attachments/924821</a>	16 C.F.R. § 310.4(b)(1)(v)
6/17/2022	6/14/2022	6037851854	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/917074">https://portal.tracebacks.org/api/public/attachments/917074</a>	16 C.F.R. § 310.4(b)(1)(v)
6/14/2022	6/9/2022	7703208774	Hotel-ComplimentaryStay	<a href="https://portal.tracebacks.org/api/public/attachments/892547">https://portal.tracebacks.org/api/public/attachments/892547</a>	16 C.F.R. § 310.4(b)(1)(v)
5/27/2022	5/23/2022	8002656558	Discount-DirecTV50	<a href="https://portal.tracebacks.org/api/public/attachments/872725">https://portal.tracebacks.org/api/public/attachments/872725</a>	16 C.F.R. § 310.4(b)(1)(v)
5/17/2022	5/16/2022	9516805349	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/857385">https://portal.tracebacks.org/api/public/attachments/857385</a>	16 C.F.R. § 310.4(b)(1)(v)
5/17/2022	5/16/2022	2483690599	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/857375">https://portal.tracebacks.org/api/public/attachments/857375</a>	16 C.F.R. § 310.4(b)(1)(v)
5/9/2022	5/6/2022	5154213538	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/838928">https://portal.tracebacks.org/api/public/attachments/838928</a>	16 C.F.R. § 310.4(b)(1)(v)
5/9/2022	5/6/2022	7033385636	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/838914">https://portal.tracebacks.org/api/public/attachments/838914</a>	16 C.F.R. § 310.4(b)(1)(v)
5/9/2022	5/7/2022	6108048892	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/838911">https://portal.tracebacks.org/api/public/attachments/838911</a>	16 C.F.R. § 310.4(b)(1)(v)

5/3/2022	5/2/2022	4093135174	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/832646">https://portal.tracebacks.org/api/public/attachments/832646</a>	16 C.F.R. § 310.4(b)(1)(v)
5/3/2022	5/2/2022	7023304213	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/832641">https://portal.tracebacks.org/api/public/attachments/832641</a>	16 C.F.R. § 310.4(b)(1)(v)
4/20/2022	4/19/2022	8086524232	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/817218">https://portal.tracebacks.org/api/public/attachments/817218</a>	16 C.F.R. § 310.4(b)(1)(v)
4/20/2022	4/19/2022	6182444400	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/817196">https://portal.tracebacks.org/api/public/attachments/817196</a>	16 C.F.R. § 310.4(b)(1)(v)
4/20/2022	4/19/2022	4074944133	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/817195">https://portal.tracebacks.org/api/public/attachments/817195</a>	16 C.F.R. § 310.4(b)(1)(v)
4/20/2022	4/18/2022	5102724382	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/817188">https://portal.tracebacks.org/api/public/attachments/817188</a>	16 C.F.R. § 310.4(b)(1)(v)
4/20/2022	4/18/2022	8326834864	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/817187">https://portal.tracebacks.org/api/public/attachments/817187</a>	16 C.F.R. § 310.4(b)(1)(v)
4/9/2022	4/7/2022	4163319899	Amazon-SuspiciousCharge	<a href="https://portal.tracebacks.org/api/public/attachments/800227">https://portal.tracebacks.org/api/public/attachments/800227</a>	16 C.F.R. § 310.4(b)(1)(v)
4/9/2022	4/7/2022	4103254936	Amazon-SuspiciousCharge	<a href="https://portal.tracebacks.org/api/public/attachments/800223">https://portal.tracebacks.org/api/public/attachments/800223</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/3/2022	7179583594	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795479">https://portal.tracebacks.org/api/public/attachments/795479</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/3/2022	9163154536	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795477">https://portal.tracebacks.org/api/public/attachments/795477</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/3/2022	9733890712	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795475">https://portal.tracebacks.org/api/public/attachments/795475</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/3/2022	8708644946	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795474">https://portal.tracebacks.org/api/public/attachments/795474</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/3/2022	3604774043	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795473">https://portal.tracebacks.org/api/public/attachments/795473</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/3/2022	8166484759	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795470">https://portal.tracebacks.org/api/public/attachments/795470</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/3/2022	6467130572	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795468">https://portal.tracebacks.org/api/public/attachments/795468</a>	16 C.F.R. § 310.4(b)(1)(v)

4/4/2022	4/3/2022	7859440013	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795467">https://portal.tracebacks.org/api/public/attachments/795467</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/3/2022	7862459683	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795465">https://portal.tracebacks.org/api/public/attachments/795465</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/2/2022	2482661156	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795462">https://portal.tracebacks.org/api/public/attachments/795462</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/2/2022	2484977889	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795460">https://portal.tracebacks.org/api/public/attachments/795460</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/1/2022	3133501429	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795459">https://portal.tracebacks.org/api/public/attachments/795459</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/3/2022	6628195327	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795456">https://portal.tracebacks.org/api/public/attachments/795456</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/2/2022	6624954062	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795454">https://portal.tracebacks.org/api/public/attachments/795454</a>	16 C.F.R. § 310.4(b)(1)(v)
4/4/2022	4/2/2022	6624144977	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/795453">https://portal.tracebacks.org/api/public/attachments/795453</a>	16 C.F.R. § 310.4(b)(1)(v)
3/25/2022	3/24/2022	2522988828	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/782206">https://portal.tracebacks.org/api/public/attachments/782206</a>	16 C.F.R. § 310.4(b)(1)(v)
3/25/2022	3/23/2022	4108525484	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/782203">https://portal.tracebacks.org/api/public/attachments/782203</a>	16 C.F.R. § 310.4(b)(1)(v)
3/24/2022	3/22/2022	3144970863	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/776734">https://portal.tracebacks.org/api/public/attachments/776734</a>	16 C.F.R. § 310.4(b)(1)(v)
3/24/2022	3/22/2022	9192484758	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/776726">https://portal.tracebacks.org/api/public/attachments/776726</a>	16 C.F.R. § 310.4(b)(1)(v)
3/24/2022	3/22/2022	6783728849	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/776717">https://portal.tracebacks.org/api/public/attachments/776717</a>	16 C.F.R. § 310.4(b)(1)(v)
3/9/2022	3/3/2022	5807714833	Amazon-AuthorizeOrder-P3	<a href="https://portal.tracebacks.org/api/public/attachments/739583">https://portal.tracebacks.org/api/public/attachments/739583</a>	16 C.F.R. § 310.4(b)(1)(v)
3/8/2022	2/28/2022	6466711465	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/719746">https://portal.tracebacks.org/api/public/attachments/719746</a>	16 C.F.R. § 310.4(b)(1)(v)
3/5/2022	2/28/2022	5707934901	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/719736">https://portal.tracebacks.org/api/public/attachments/719736</a>	16 C.F.R. § 310.4(b)(1)(v)



3/3/2022	2/28/2022	9312679487	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/719755">https://portal.tracebacks.org/api/public/attachments/719755</a>	16 C.F.R. § 310.4(b)(1)(v)
3/2/2022	3/1/2022	4147476980	SSA-P1-TexasFraud (GovtImpers)	<a href="https://portal.tracebacks.org/api/public/attachments/723508">https://portal.tracebacks.org/api/public/attachments/723508</a>	16 C.F.R. § 310.4(b)(1)(v)
3/2/2022	2/28/2022	4147479820	SSA-P1-TexasFraud (GovtImpers)	<a href="https://portal.tracebacks.org/api/public/attachments/723504">https://portal.tracebacks.org/api/public/attachments/723504</a>	16 C.F.R. § 310.4(b)(1)(v)
3/2/2022	2/28/2022	6015262841	SSA-P1-TexasFraud (GovtImpers)	<a href="https://portal.tracebacks.org/api/public/attachments/723501">https://portal.tracebacks.org/api/public/attachments/723501</a>	16 C.F.R. § 310.4(b)(1)(v)
3/2/2022	2/28/2022	7047716086	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/719750">https://portal.tracebacks.org/api/public/attachments/719750</a>	16 C.F.R. § 310.4(b)(1)(v)
3/1/2022	2/28/2022	8137771172	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/719759">https://portal.tracebacks.org/api/public/attachments/719759</a>	16 C.F.R. § 310.4(b)(1)(v)
3/1/2022	2/28/2022	9173533758	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/719744">https://portal.tracebacks.org/api/public/attachments/719744</a>	16 C.F.R. § 310.4(b)(1)(v)
2/19/2022	2/17/2022	6093465559	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/702988">https://portal.tracebacks.org/api/public/attachments/702988</a>	16 C.F.R. § 310.4(b)(1)(v)
2/18/2022	2/17/2022	2106436489	LegalDept-Action-P1	<a href="https://portal.tracebacks.org/api/public/attachments/702999">https://portal.tracebacks.org/api/public/attachments/702999</a>	16 C.F.R. § 310.4(b)(1)(v)
2/16/2022	2/15/2022	5127849022	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/attachments/698028">https://portal.tracebacks.org/api/public/attachments/698028</a>	16 C.F.R. § 310.4(b)(1)(v)
2/5/2022	2/3/2022	8147693260	SSA-KindlyPressOne	<a href="https://portal.tracebacks.org/api/public/attachments/668449">https://portal.tracebacks.org/api/public/attachments/668449</a>	16 C.F.R. § 310.4(b)(1)(v)
12/8/2021	12/7/2021	2482029746	SSA-KindlyPressOne	<a href="https://portal.tracebacks.org/api/public/attachments/584749">https://portal.tracebacks.org/api/public/attachments/584749</a>	16 C.F.R. § 310.4(b)(1)(v)
12/8/2021	12/6/2021	7862867659	SSA-KindlyPressOne	<a href="https://portal.tracebacks.org/api/public/attachments/584766">https://portal.tracebacks.org/api/public/attachments/584766</a>	16 C.F.R. § 310.4(b)(1)(v)
12/8/2021	12/6/2021	9176757189	SSA-KindlyPressOne	<a href="https://portal.tracebacks.org/api/public/attachments/584765">https://portal.tracebacks.org/api/public/attachments/584765</a>	16 C.F.R. § 310.4(b)(1)(v)
12/8/2021	12/7/2021	2482029746	SSA-KindlyPressOne	<a href="https://portal.tracebacks.org/api/public/attachments/584749">https://portal.tracebacks.org/api/public/attachments/584749</a>	16 C.F.R. § 310.4(b)(1)(v)
10/15/2021	10/13/2021	3028747332	Utility-30MinDisconnect	<a href="https://portal.tracebacks.org/api/public/attachments/520014">https://portal.tracebacks.org/api/public/attachments/520014</a>	16 C.F.R. § 310.4(b)(1)(v)

10/9/2021	10/7/2021	4147325414	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/500510">https://portal.tracebacks.org/api/public/attachments/500510</a>	16 C.F.R. § 310.4(b)(1)(v)
10/9/2021	10/7/2021	6614122607	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/500508">https://portal.tracebacks.org/api/public/attachments/500508</a>	16 C.F.R. § 310.4(b)(1)(v)
10/7/2021	10/5/2021	6143235264	CCIRR-VisaAlert	<a href="https://portal.tracebacks.org/api/public/attachments/497288">https://portal.tracebacks.org/api/public/attachments/497288</a>	16 C.F.R. § 310.4(b)(1)(v)
10/1/2021	9/30/2021	4059239570	Utility-30MinDisconnect	<a href="https://portal.tracebacks.org/api/public/attachments/487206">https://portal.tracebacks.org/api/public/attachments/487206</a>	16 C.F.R. § 310.4(b)(1)(v)
9/29/2021	9/27/2021	6626695958	Legal-Enforcement-Notice	<a href="https://portal.tracebacks.org/api/public/attachments/482002">https://portal.tracebacks.org/api/public/attachments/482002</a>	16 C.F.R. § 310.4(b)(1)(v)
9/29/2021	9/27/2021	2286694932	Legal-Enforcement-Notice	<a href="https://portal.tracebacks.org/api/public/attachments/482001">https://portal.tracebacks.org/api/public/attachments/482001</a>	16 C.F.R. § 310.4(b)(1)(v)
9/21/2021	9/20/2021	6097092115	Legal-Enforcement-Notice	<a href="https://portal.tracebacks.org/api/public/attachments/463269">https://portal.tracebacks.org/api/public/attachments/463269</a>	16 C.F.R. § 310.4(b)(1)(v)
9/21/2021	9/20/2021	2542929104	Legal-Enforcement-Notice	<a href="https://portal.tracebacks.org/api/public/attachments/463260">https://portal.tracebacks.org/api/public/attachments/463260</a>	16 C.F.R. § 310.4(b)(1)(v)
9/13/2021	9/9/2021	5709943714	Computer-Hijack	<a href="https://portal.tracebacks.org/api/public/attachments/444728">https://portal.tracebacks.org/api/public/attachments/444728</a>	16 C.F.R. § 310.4(b)(1)(v)
8/2/2021	7/31/2021	3032284100	Utility-30MinDisconnect	<a href="https://portal.tracebacks.org/api/public/attachments/314155">https://portal.tracebacks.org/api/public/attachments/314155</a>	16 C.F.R. § 310.4(b)(1)(v)
7/21/2021	7/19/2021	2031234100	TechSupport-Refund	<a href="https://portal.tracebacks.org/api/public/attachments/291148">https://portal.tracebacks.org/api/public/attachments/291148</a>	16 C.F.R. § 310.4(b)(1)(v)
1/7/2021	1/6/2021	2056260450	SSA-P1-TexasFraud (GovtImpers)	<a href="https://portal.tracebacks.org/api/public/attachments/27576">https://portal.tracebacks.org/api/public/attachments/27576</a>	16 C.F.R. § 310.4(b)(1)(v)
1/6/2021	1/6/2021	2056260450	SSA-P1-TexasFraud (GovtImpers)	<a href="https://portal.tracebacks.org/api/public/attachments/27574">https://portal.tracebacks.org/api/public/attachments/27574</a>	16 C.F.R. § 310.4(b)(1)(v)