



1 **TeraMESH Networks, Inc.**, a  
2 California corporation;

3 **Andrew Salisbury**, also known as  
4 Andy Salisbury, individually and as  
5 an owner, officer, manager, or *de facto*  
6 owner, officer, or manager of  
7 World Connection USA, LLC,  
World Connection, LLC, and  
World Connection, S.A.;

8 **World Connection USA, LLC**, a  
9 California limited liability company;

10 **World Connection, LLC**, an Idaho  
11 limited liability company; and

12 **World Connection, S.A.**, a Guatemalan  
13 business entity;

14 Defendants.  
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17 Plaintiff, the Federal Trade Commission (“FTC”), for its Complaint alleges:

18 1. The FTC brings this action under Sections 5(a), 5(m)(1)(A), 13(b),  
19 and 16(a) of the FTC Act, 15 U.S.C. §§ 45(a), 45(m)(1)(A), 53(b), and 56(a), and  
20 Section 6 of the Telemarketing and Consumer Fraud and Abuse Prevention Act (the  
21 “Telemarketing Act”), 15 U.S.C. § 6105, to obtain monetary civil penalties,  
22 permanent injunctive relief, and other relief for Defendants’ acts or practices in  
23 violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and the FTC’s  
24 Telemarketing Sales Rule (“TSR”), as amended, 16 C.F.R. Part 310.

25 **IFTC**  
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1 **JURISDICTION AND VENUE**

2 14. This Court has subject matter jurisdiction pursuant to 28 U.S.C.  
3 §§ 1331, 1337(a), 1345, and 1355, and 15 U.S.C. §§ 45(a) and (m)(1)(A), 53(b),  
4 and 56(a).

5 15. Venue is proper in this district under 28 U.S.C. §§ 1391(b)(1), (b)(2),  
6 (c)(1), (c)(2), (c)(3) and (d), and 1395(a), and 15 U.S.C. § 53(b).

7 **PLAINTIFF**

8 16. The FTC is an independent agency of the United States government  
9 created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC  
10 Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or  
11 affecting commerce. The FTC also enforces the Telemarketing Act, 15 U.S.C.  
12 §§ 6101-6108. Pursuant to the Telemarketing Act, the FTC promulgated and  
13 enforces the TSR, 16 C.F.R. Part 310, which prohibits deceptive and abusive  
14 telemarketing acts or practices.

15 17. The FTC is authorized to initiate federal district court proceedings, by  
16 its own attorneys, to enjoin violations of the FTC Act and the TSR, to secure such  
17 equitable relief as may be appropriate in each case, including rescission or  
18 reformation of contracts, restitution, the refund of monies paid, and the  
19 disgorgement of ill-gotten monies. 15 U.S.C. § 53(b). The FTC is also authorized  
20 to obtain civil penalties for violations of the TSR. 15 U.S.C. § 45(m)(1)(A).

21 **DEFENDANTS**

22 *The TelWeb Defendants*

23 18. Defendant **NetDotSolutions, Inc.** (“NetDotSolutions”) is a California  
24 corporation with its principal place of business in Orange County, California.  
25 NetDotSolutions transacts or has transacted business in this district and throughout  
26 the United States. At one time, NetDotSolutions was registered with the FCC as a  
27 telecommunications carrier. However, on or before June 1, 2014, NetDotSolutions  
28 informed the FCC that “this company still exists, however it is no longer

1 performing telecommunications services.” To the extent NetDotSolutions

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1 Connection, LLC transacts business in this district and throughout the United  
2 States.

3 24. Defendant **World Connection, S.A.** is a Guatemalan2c( )Tj bt5(ua)3.6(t)8.5(e)3.5

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1 acts and practices of the TelWeb Enterprise. Defendant Christiano has formulated,  
2 directed, controlled, had the authority to control, or participated in the acts and  
3 practices of the TelWeb Enterprise.

4 28. Corporate Defendants World Connection USA, LLC, World  
5 Connection, LLC, and World Connection, h0f-8.1(i)0.5(on)JT 0 Tc 0 Tw 11.368 0 Td (,)Tj

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1           49. TelWeb also provided technology through which users were able to  
2 place outbound calls in “answering machine only” telemarketing campaigns that  
3 automatically hung up or abandoned the call when a live person answered, but left  
4 prerecorded messages when an answering machine answered the call.

5           50. TelWeb also assists and facilitates robocall messages by providing  
6 telephone numbers that telemarketers may call to record a message they want to  
7 play as part of their outbound robocall campaigns.

8   ***Salisbury and Jones’s Auto Warranty***

9   ***Telemarketing Operation Dialed through TelWeb***

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1           56. Salisbury collocated with the Red Hill Enterprise, and he provided the  
2 other members of the Red Hill Enterprise with advice and guidance when they  
3 received subpoenas or lawsuits.

4           57. In June 2013, Dial Soft became the corporate entity that the Red Hill  
5 Robocall Enterprise used to contract with the TelWeb companies. Though he kept  
6 his name off the corporate documents filed with the Nevada Secretary of State to  
7 obfuscate his involvement, Salisbury was responsible for Dial Soft's formation and  
8 for finding its first titular owner. He was listed, however, as the "Billing Contact"  
9 on all three of Dial Soft's contracts with the TelWeb companies. Salisbury  
10 personally negotiated these contracts on behalf of Jones and Dial Soft with the  
11 TelWeb companies, including negotiating with Christiano over the rate structure  
12 for long distance minutes. On June 24, 2013, Salisbury sent the signed contracts to  
13 Christiano via email, and Salisbury even offered to hand-deliver hard copies.

14           58. Salisbury also provided assistance to Jones's enterprise by providing  
15 advice on how to respond to subpoenas. Jones's former employees have testified  
16 that the enterprise received subpoenas frequently, and that they often turned to  
17 Salisbury for advice.

18           59. In fact, ju.5(s)-8e-.5(d )d3.6(y)16.8( s )3.5(c)3.7(at)3.6(r)12.2(sse)3.5(nt5(d ).5(d )

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1 and services. For example between August 26, 2013 and March 5, 2014, the  
2 WConnection

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***Unlawful Calls Dialed through TelWeb***

64. Salisbury’s WConnection Enterprise and Jones’s other businesses and clients are responsible for bombarding American consumers in all fifty states and the District of Columbia with billions of illegal robocalls, all dialed through Christiano’s TelWeb platform.

65. These robocalls pitched numerous different consumer goods and services, including reverse mortgages, tax debt relief, “pain cream,” timeshares, vacation services, credit card debt relief, student loan debt relief, home security systems, solar energy and solar panels, extended auto warranties, medical pendants, and others.

66. At all times from June 24, 2013 through May 2016, Salisbury, Jones, and their businesses and customers obtained access to TelWeb through Dial Soft’s contracts with TelWeb, which Salisbury negotiated and delivered to TelWeb.


1 Neighbor spoofing is when a caller spoofs the area code and exchange of a  
2 consumer's phone number so that the consumer thinks the call is coming from  
3 someone near them. For 54 million of these calls, Jones's Red Hill Robocall  
4 enterprise generated an outbound caller ID for the outbound calls by adding 128 to  
5 the number being called.

6 69. These spoofed calls generated almost 8,000 consumer complaints  
7 submitted to the FTC. All of these complaints are (s)-3.e

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1 | about calls from the same spoofed number, many indicating they received home  
2 | security robocalls. That same day, the WConnection Enterprise initiated 3,778,502

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1 (which TelWeb knew included WConnection) were using the TelWeb dialing  
2 platform to make unlawful telemarketing calls. In fact, Christiano had been  
3 receiving complaints about Jones from consumers, telecom providers, and the  
4 FCC, since at least 2006.

5 76. Specifically, TelWeb's owner, Christiano, knew or consciously  
6 avoided knowing that Dial Soft, its affiliates within Jones's enterprise, or their  
7 customers were unlawfully dialing numbers on the DNC Registry. On or about  
8 December 11, 2006, Christiano emailed Salisbury and Jones and told them:

9 We are getting complaints from a batch of numbers  
10 below. We added the numbers to the DNC on 11/15, but  
11 they are still getting through. It looks like Coast to  
12 Coast, ABM [a company] and Mike [Jones] are dialing  
13 the numbers and bypassing the DNC. Are you running  
14 campaigns with NODNC? or the DNC checkbox off?

15 77. A few months later, on or about April 4, 2007, NetDotSolutions  
16 received a citation from the FCC for unlawful robocalls. That citation result3.3(o)-5A  
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1 TelWeb system but not connected to a person or voice mail system that answered  
2 the phone.

3 **VIOLATIONS OF THE TELEMARKETING SALES RULE**

4 **Count I—TelWeb Defendants and Salisbury**

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1 d) Abandoned outbound telephone calls, in violation of 16 C.F.R.  
2 § 310.4(b)(1)(iv).

3 87. The TelWeb Defendants and Salisbury knew, or consciously avoided  
4 knowing, that Dial Soft, its affiliates within Jones's enterprise and/or its customers,  
5 including the WConnection Enterprise, were making the calls described in  
6 paragraph 86, which violated § 310.4 of the TSR.

7 88. The TelWeb Defendants' and Salisbury's substantial assistance or  
8 support, as alleged in Paragraphs 85-87, above, violates the TSR, 16 C.F.R.  
9 § 310.3(b).

10 **Count II—WConnection Defendants**

11 **Unlawful Prerecorded Messages**

12 89. As described in paragraphs 2–13 and 60–84, as applicable, in  
13 numerous instances, in connection with telemarketing, the WConnection  
14 Defendants have engaged in initiating or causing the initiation of outbound  
15 telephone calls that delivered prerecorded messages to induce the sale of goods or  
16 services, in violation of 16 C.F.R. § 310.4(b)(1)(v).

17 **Count III—WConnection Defendants**

18 **Violating the National Do Not Call Registry**

19 90. As described in paragraphs 2–13 and 60–84, as applicable, in  
20 numerous instances, in connection with telemarketing, the WConnection  
21 Defendants have engaged in initiating or causing the initiation of outbound  
22 telephone calls to telephone numbers on the National DNC Registry to induce the  
23 purchase of goods or services, in violation of 16 C.F.R. § 310.4(b)(1)(iii)(B).

24 **Count IV—WConnection Defendants**

25 **Failure to Transmit Caller ID**

26 91. As deAs described in pars  
27 Failure to Transmit Caller ID  
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1 services the telephone number and name of the telemarketer making the call, or the  
2 customer service number and name of the seller on whose behalf the telemarketer  
3 called, in violation of 16 C.F.R. § 310.4(a)(8).

4 **Count V—WConnection Defendants**

5 **Assisting and Facilitating Abusive Telemarketing**

6 **Acts or Practices in Violation of the Telemarketing Sales Rule**

7 92. As described in paragraphs 2–13 and 60–84, as applicable, in  
8 numerous instances the WConnection Defendants have

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1           A.     Enter judgment against Defendants and in favor of Plaintiff for each  
2 violation alleged in this Complaint;

3           B.     Award Plaintiff monetary civil penalties from each Defendant for  
4 every violation of the TSR;

5           C.     Enter a permanent injunction to prevent future violations of the TSR  
6 and the FTC Act by Defendants;

7           D.     Award Plaintiff the costs of bringing this action, as well as such other  
8 and additional relief as the Court may determine to be just and proper.

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**Alden F. Abbott**  
General Counsel

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Dated: May 31, 2018

/s/ Faye Chen Barnouw

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**Ian L. Barlow**, D.C. Bar No. 998500

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**James E. Evans**, Va. Bar No. 83866

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**APPENDIX**

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- 1 • Defendants accessed TelWeb by paying C1F, owned by Mike Jones and  
2 Andy Salisbury.

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4 *FTC v. JGRD, Inc., d/b/a Voiceblaze*, No. 2:12-cv-00945 (E.D. Pa. filed Feb. 23,  
5 2012)

- 6 • In February 2012, Voiceblaze and its owners settled claims that they  
7 engaged in abusive telemarketing practices and assisted and facilitated  
8 the abusive telemarketing practices of others.  
9 • Defendant Charles Garis testified that he resold access to  
10 NetDotSolutions, a/k/a TelWeb; that he paid for access by sending money  
11 to C1F; and that his contact was Mike Jones.

12  
13 *United States v. Versatile Marketing Solutions*, No. 1:14-cv-10612 (D. Mass. filed  
14 Mar. 10, 2014)

- 15 • In March 2014, home security telemarketing and installation company  
16 and its owner settled charges that they called numbers on the DNC  
17 Registry.  
18 • Justin Ramsey, Mike Jones, and their businesses generated leads for  
19 VMS via “press 1” robocalls through TelWeb.

20  
21 *FTC v. Ramsey*, No. 9:17-cv-80032 (S.D. Fla. filed Jan. 10, 2017)

- 22 • In April 2017, Ramsey agreed to stipulated Order prohibiting calls to any  
23 number on DNC Registry. Ramsey used TelWeb to place unlawful calls  
24 soliciting sales for home security systems, extended auto warranties,  
25 reverse mortgages, tax debt relief, student loan debt relief, travel /  
26 vacation packages, and products.

1 *FTC v. Jones*, No. 8:17-cv-00058 (C.D. Cal. filed Jan. 11, 2017)

- 2 • In June 2017, the Court entered default judgment and a permanent  
3 injunction banning Jones and his companies from telemarketing, making  
4 robocalls, and calling numbers on the DNC Registry after the FTC  
5 showed that they assisted and facilitated billions of illegal calls soliciting  
6 sales for home security systems and extended auto warranties, among  
7 other products and services.
- 8 • All of the calls, including hundreds of millions to numbers on DNC  
9 Registry, were dialed via TelWeb.

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11 *FTC v. Gotra*, No. 1:18-cv-10548 (D. Mass. filed March 22, 2018)

- 12 • Several defendants have settled, but claims remain against Alliance  
13 Security, formerly known as Versatile Marketing Solutions, and its CEO  
14 and majority owner, Jay Gotra.
- 15 • A motion for Preliminary Injunction is currently pending against the  
16 remaining defendants.
- 17 • Many of the calls by Alliance's telemarketers were dialed by or on behalf  
18 of the WConnection Enterprise using TelWeb and transferred to the  
19 WConnection Enterprise's call center.

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