



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

March 17, 2023

CEASE AND DESIST DEMAND

VIA EMAIL TO:

accounting@telcentris.com;
accounting@telecentris.com

Telcentris, Inc., also d/b/a Voxox
Bryan Hertz, CEO
5825 Oberlin Drive, Suite 5
San Diego, CA 92121
c/o Kristopher Twomey, Registered Agent

We have determined that Telcentris, Inc., also d/b/a Voxox (Telcentris) is apparently routing and transmitting illegal robocall traffic, directly or indirectly, for entities involved in the following campaigns:

- x Amazon-AuthorizeOrder
- x Apple-iCloud-AccountBreached
- x CCIRR-VisaAlert
- x SSA-Suspended
- x StudentLoan-ProcessingCenter
- x Utility-30MinDisconnect

More specifically, our investigation revealed that Telcentris 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 15, 2021, and December 21, 2022, ITG investigated 16 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

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).

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

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 Telcentris 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
14:55:26 -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/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->

ATTACHMENT A

Date of ITG Notification	Date of Call	Caller ID	Robocall Campaign Identifier	Link to Robocall Recording	Potential Violation
12/21/2022	12/20/2022	4092694582	StudentLoan-ProcessingCenter	https://portal2.tracebacks.org/api/public/attachments/1183779	16 C.F.R. 310.4(b)(1)(v)
12/21/2022	12/20/2022	2293548990	StudentLoan-ProcessingCenter	https://portal2.tracebacks.org/api/public/attachments/1183793	16 C.F.R. 310.4(b)(1)(v)
10/27/2022	10/26/2022	2038886127	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/1100694	16 C.F.R. 310.4(b)(1)(v)
10/27/2022	10/26/2022	6143009785	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/1100697	16 C.F.R. 310.4(b)(1)(v)
7/27/2022	7/26/2022	3262225019	SSA-Suspended	https://portal2.tracebacks.org/api/public/attachments/974385	16 C.F.R. 310.4(b)(1)(v)
7/27/2022	7/26/2022	5205270501	SSA-Suspended	https://portal2.tracebacks.org/api/public/attachments/974387	16 C.F.R. 310.4(b)(1)(v)
2/17/2022	2/5/2022	8033881517	SSA-Suspended	https://portal2.tracebacks.org/api/public/attachments/688077	16 C.F.R. 310.4(b)(1)(v)
12/3/2021	12/2/2021	6157665214	CCIRR-VisaAlert	https://portal2.tracebacks.org/api/public/attachments/579548	16 C.F.R. 310.4(b)(1)(v)
11/19/2021	11/18/2021	4845785720	Amazon-AuthorizeOrder	https://portal2.tracebacks.org/api/public/attachments/565718	16 C.F.R. 310.4(b)(1)(v)
10/18/2021	10/14/2021	8137654004	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/520026	16 C.F.R. 310.4(b)(1)(v)
10/15/2021	10/14/2021	8168881463	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/520019	16 C.F.R. 310.4(b)(1)(v)
10/15/2021	10/14/2021	8133353576	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/520027	16 C.F.R. 310.4(b)(1)(v)
10/8/2021	10/7/2021	3053938506	Amazon-AuthorizeOrder	https://portal2.tracebacks.org/api/public/attachments/500486	16 C.F.R. 310.4(b)(1)(v)
8/2/2021	7/31/2021	7024025555	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/314151	16 C.F.R. 310.4(b)(1)(v)

3/9/2021	3/8/2021	9107928296	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/64732	16 C.F.R. 310.4(b)(1)(v)
1/15/2021	1/15/2021	4088847419	Apple-iCloud-AccountBreached	https://portal2.tracebacks.org/api/public/attachments/28354	16 C.F.R. 310.4(b)(1)(v)