



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

November 27, 2023

CEASE AND DESIST DEMAND

Acrobat Communications, Inc.
Constantin Barbulescu, CEO
P.O. Box 110141
Lakewood Ranch, FL 34211
c/o Diane Flanagan, Registered Agent

We have determined that Acrobat Communications, Inc., is apparently routing and transmitting illegal robocall traffic, directly or indirectly, for entities involved in the following campaigns:

- Amazon-AuthorizeOrder
- Amazon-AuthorizeOrder-P2
- Amazon-AuthorizeOrder-P3
- Amazon-SuspiciousCharge
- Amazon-SuspiciousCharge-P1
- Amazon-Various-P1
- Authorized-Order
- Authorized-Order-P1
- CCIRR-P3FinancialImpers
- Chinese-Consulate-P1
- Chinese-Consulate-P2
- Chinese-ExpressReturn
- Chinese-ISP/Cable/Wireless-Impers
- FedReserv-Impers
- Financial-Impers-4
- Impersonation-Fraud-P1
- Recent-Purchase
- SSA-CalltheSSA
- SSA-KindlyPressOne

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. 16 C.F.R. § 1.98. In addition, a violation of the TSR is a violation of Section 5 of the FTC Act. 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. 15 U.S.C. § 53(b). The FTC may also seek the refund of money or payment of damages to address TSR violations. 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. *FTC v. [redacted]*, 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. [redacted]*, the FTC alleged that defendant Globex

~~13 (b) 3 (c) assisted and facilitated (4) (d) 2 (b) 3 (g) 4 (a) 4 (1) 2 (r) 4 (om)-1e0 (a) 4 (1) 4 (t) v § 57b(1) 1EMO~~

The FTC has business educational materials that can assist you in complying with the TSR. <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 ,

ATTACHMENT A

--	--	--	--	--	--