

United States of America  
FEDERAL TRADE COMMISSION  
East Central Region

1111 Superior Avenue, Suite 200  
Cleveland, Ohio 44114  
(216) 2633455

Jon Miller Steiger  
Director

November 27, 2023

CEASE AND DESIST DEMAND

VIA EMAIL TO:  
dbonner@potomacclaw.com

iDentidad Advertising Development, LLC  
Andres Sanchez, CEO  
848 Brickell Avenue, Suite 810  
Miami, FL 33133  
c/o Potomac Law Group, PLLC Registered Agent

We have determined that iDentidad Advertising Development, LLC, is apparently routing and transmitting illegal robocall traffic directly or indirectly for entities involved in the following campaigns:

- x AmazonAuthorizeOrder
- x AmazonAuthorizeOrderP3
- x AmazonSuspiciousChargeP1
- x AmazonVariousP1
- x AmazonVariousP3
- x AuthorizedOrderP2
- x ChineseISP/Cable/WirelessImpers
- x ChinesePackageDeliveryP3
- x FinancialImpers4
- x FinancialImpers7
- x GovtImpers
- x GovtImpersP1
- x RecentPurchase
- x SSAImpers
- x Utility -30MinDisconnect
- x Utility -

The Federal Trade Commission (FTC) worked closely with USTelecom's Industry Traceback Group (ITG), which is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks. Between August 21, 2022, and October 3, 2023, ITG investigated 61 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. ITG conducted tracebacks and determined that iDentidad Advertising Development, LLC, 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 and/or a description of the illegal robocall—as indicated in Attachment A. Further, the numerous traceback notices directed to iDentidad Advertising Development, LLC, 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**

The FTC can obtain civil penalties for TSR violations. Each illegal call is subject to a maximum civil penalty of \$50,120. 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).

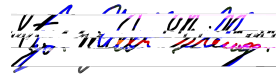
Combatting illegal telemarketing is a top priority for the FTC, with a special emphasis on halting illegal robocalls. We want you to be aware that the FTC has, for example, brought assisting and facilitating claims against technology companies that knowingly provided software and servers used by illegal robocallers, even though these technology companies did not contract directly with the illegal robocallers. See *FTC v. James B. Christiano*, Case No. 18-00936 (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 knowingly avoided knowing, were violating the TSR's prohibitions on delivering prerecorded messages. See *FTC v. Educare Centre Services, Inc.*, No. 3:19-cv-00196-KC (W.D. Tex. Dec. 3, 2019).<sup>5</sup> F v

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) 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. August 2020, a federal district court entered a permanent order barring the defendants from conveying telephone calls into the U.S. telephone system.<sup>10</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 iDentidad Advertising Development, LLC, 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,



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Jon Miller Steiger  
Director

Enclosures:

Attachment A (Chart of illegal robocalls)

Attachment B (TSR)

Attachment C (Educare Amended Complaint)

Attachment D (Alcazar Complaint)

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<sup>10</sup> See <https://www.justice.gov/opa/pr/departments-justice-files-actions-stop-telecom-carriers-who-facilitated-hundreds-millions>.

<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/2022/08/02/vermont-joins-national-wide-robocall-task-force>; <https://www.michigan.gov/ag/news/press-releases/2020/08/07/ag-announces-settlement-eliminating-telecom-carrier-responsible-for-illegal-robocalls>; [https://www.michigan.gov/documents/ag/Assurance\\_of\\_Voluntary\\_Compliance\\_-\\_All\\_Access\\_Telecom\\_FINAL\\_9-1-20\\_702047\\_7.pdf](https://www.michigan.gov/documents/ag/Assurance_of_Voluntary_Compliance_-_All_Access_Telecom_FINAL_9-1-20_702047_7.pdf)

# ATTACHMENT A

Date of ITG Notification	Date of Call	Caller ID	Robocall Campaign Identifier	Link to Robocall Recording	Potential Violation
10/4/2023	10/3/2023	19547322937	Amazon-AuthorizeOrder-P3		

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

5/31/2023	5/30/2023	16784720325	Amazon-Variou-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1326257">https://portal.tracebacks.org/api/public/attachments/1326257</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/26/2023	5/23/2023	15615041984	Amazon-Variou-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1323679">https://portal.tracebacks.org/api/public/attachments/1323679</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/24/2023	5/23/2023	13304471636	Amazon-Variou-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1323675">https://portal.tracebacks.org/api/public/attachments/1323675</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/24/2023	5/24/2023	14195338150	Amazon-Variou-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1323671">https://portal.tracebacks.org/api/public/attachments/1323671</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/24/2023	5/24/2023	15052862290	Amazon-Variou-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1323669">https://portal.tracebacks.org/api/public/attachments/1323669</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/15/2023	5/13/2023	12038492912	Amazon-Variou-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1315933">https://portal.tracebacks.org/api/public/attachments/1315933</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/15/2023	5/13/2023	17087696501	Amazon-Variou-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1315929">https://portal.tracebacks.org/api/public/attachments/1315929</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/15/2023	5/13/2023	16316840615	Amazon-Variou-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1315925">https://portal.tracebacks.org/api/public/attachments/1315925</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/15/2023	5/13/2023	16617451127	Amazon-Variou-P3	<a href="https://portal.tracebacks.org/api/public/attachments/1315917">https://portal.tracebacks.org/api/public/attachments/1315917</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/4/2023	5/3/2023	19524454291	Utility-30MinDisconnect	<a href="https://portal.tracebacks.org/api/public/attachments/1297871">https://portal.tracebacks.org/api/public/attachments/1297871</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/3/2023	5/1/2023	14135524117	Utility-30MinDisconnect	<a href="https://portal.tracebacks.org/api/public/attachments/1296725">https://portal.tracebacks.org/api/public/attachments/1296725</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/1/2023	4/29/2023	12317799950	Utility-30MinDisconnect	<a href="https://portal.tracebacks.org/api/public/attachments/1294794">https://portal.tracebacks.org/api/public/attachments/1294794</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/1/2023	4/29/2023	12318594830	Utility-30MinDisconnect	<a href="https://portal.tracebacks.org/api/public/attachments/1294792">https://portal.tracebacks.org/api/public/attachments/1294792</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/1/2023	4/29/2023	12317802306	Utility-30MinDisconnect	<a href="https://portal.tracebacks.org/api/public/attachments/1294790">https://portal.tracebacks.org/api/public/attachments/1294790</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
5/1/2023	4/28/2023	18188106349	Utility-30MinDisconnect	<a href="https://portal.tracebacks.org/api/public/attachments/1294778">https://portal.tracebacks.org/api/public/attachments/1294778</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
4/26/2023	4/25/2023	12703361226	Authorized-Order-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1289697">https://portal.tracebacks.org/api/public/attachments/1289697</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
4/25/2023	4/24/2023	7852238190	Authorized-Order-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1288032">https://portal.tracebacks.org/api/public/attachments/1288032</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
4/24/2023	4/21/2023	2316277251	Utility-30MinDisconnect	<a href="https://portal.tracebacks.org/api/public/attachments/1285450">https://portal.tracebacks.org/api/public/attachments/1285450</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
4/21/2023	4/20/2023	5613099144	Authorized-Order-P2	<a href="https://portal.tracebacks.org/api/public/attachments/1283147">https://portal.tracebacks.org/api/public/attachments/1283147</a>	atta 16 C.F.R. § 310.4(b)(1)(v)

4/13/2023	4/12/2023	6072221080	Amazon-AuthorizeOrder-P3	<a href="https://portal.tracebacks.org/api/public/comments/1273438">https://portal.tracebacks.org/api/public/comments/1273438</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
3/17/2023	3/9/2023	5044966684	Financial-Impers-4	<a href="https://portal.tracebacks.org/api/public/comments/1255797">https://portal.tracebacks.org/api/public/comments/1255797</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
3/14/2023	3/9/2023	9892699472	Recent-Purchase	<a href="https://portal.tracebacks.org/api/public/comments/1254984">https://portal.tracebacks.org/api/public/comments/1254984</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
3/14/2023	3/9/2023	4173224643	Recent-Purchase	<a href="https://portal.tracebacks.org/api/public/comments/1254978">https://portal.tracebacks.org/api/public/comments/1254978</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
3/9/2023	3/7/2023	9736996899	Amazon-AuthorizeOrder-P3	<a href="https://portal.tracebacks.org/api/public/comments/1252751">https://portal.tracebacks.org/api/public/comments/1252751</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
3/9/2023	3/7/2023	6026799435	Amazon-AuthorizeOrder-P3	<a href="https://portal.tracebacks.org/api/public/comments/1252749">https://portal.tracebacks.org/api/public/comments/1252749</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
3/9/2023	3/7/2023	7148643165	Amazon-AuthorizeOrder-P3	<a href="https://portal.tracebacks.org/api/public/comments/1252743">https://portal.tracebacks.org/api/public/comments/1252743</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
3/9/2023	3/7/2023	7148646461	Amazon-AuthorizeOrder-P3	<a href="https://portal.tracebacks.org/api/public/comments/1252739">https://portal.tracebacks.org/api/public/comments/1252739</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
3/9/2023	2/28/2023	6514890009	Utility-Impers-P1		16 C.F.R. § 310.4(b)(1)(v)
3/7/2023	3/6/2023	7142909953	Authorized-Order-P2	<a href="https://portal.tracebacks.org/api/public/comments/1251119">https://portal.tracebacks.org/api/public/comments/1251119</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
3/7/2023	3/6/2023	3042372132	Authorized-Order-P2	<a href="https://portal.tracebacks.org/api/public/comments/1251113">https://portal.tracebacks.org/api/public/comments/1251113</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
3/7/2023	3/6/2023	8603898757	Authorized-Order-P2	<a href="https://portal.tracebacks.org/api/public/comments/1251111">https://portal.tracebacks.org/api/public/comments/1251111</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
3/7/2023	3/6/2023	9186932466	Authorized-Order-P2	<a href="https://portal.tracebacks.org/api/public/comments/1251109">https://portal.tracebacks.org/api/public/comments/1251109</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
1/4/2023	1/3/2023	8005179160	Chinese-PackageDelivery-P3	<a href="https://portal.tracebacks.org/api/public/comments/1195631">https://portal.tracebacks.org/api/public/comments/1195631</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
1/4/2023	1/3/2023	8003382853	Chinese-PackageDelivery-P3	<a href="https://portal.tracebacks.org/api/public/comments/1195623">https://portal.tracebacks.org/api/public/comments/1195623</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
12/2/2022	12/1/2022	2143620867	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/comments/1159017">https://portal.tracebacks.org/api/public/comments/1159017</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
11/28/2022	11/17/2022	2023246376	Chinese-PackageDelivery-P3	<a href="https://portal.tracebacks.org/api/public/comments/1137680">https://portal.tracebacks.org/api/public/comments/1137680</a>	atta 16 C.F.R. § 310.4(b)(1)(v)
11/25/2022	11/3/2022	7872044706	Financial-Impers-4		16 C.F.R. § 310.4(b)(1)(v)
11/14/2022	11/10/2022	8179296757	Amazon-SuspiciousCharge-P1	<a href="https://portal.tracebacks.org/api/public/comments/1129547">https://portal.tracebacks.org/api/public/comments/1129547</a>	atta 16 C.F.R. § 310.4(b)(1)(v)



10/12/2022	10/10/2022	0783652113	Amazon-Variou-P1	<a href="https://portal.tracebacks.org/api/public/attachments/1066872">https://portal.tracebacks.org/api/public/attachments/1066872</a>	16 C.F.R. § 310.4(b)(1)(v)
9/12/2022	8/21/2022	5055067656	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/1006849">https://portal.tracebacks.org/api/public/attachments/1006849</a>	16 C.F.R. § 310.4(b)(1)(v)
8/23/2022	8/21/2022	4253011617	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/1006875">https://portal.tracebacks.org/api/public/attachments/1006875</a>	16 C.F.R. § 310.4(b)(1)(v)
8/23/2022	8/21/2022	9192722261	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/1006858">https://portal.tracebacks.org/api/public/attachments/1006858</a>	16 C.F.R. § 310.4(b)(1)(v)
8/23/2022	8/21/2022	2036716660	Amazon-AuthorizeOrder	<a href="https://portal.tracebacks.org/api/public/attachments/1006854">https://portal.tracebacks.org/api/public/attachments/1006854</a>	16 C.F.R. § 310.4(b)(1)(v)