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April 9, 2025

Oksana Grant, CEO
Global Net Holdings, Inc.
9813 Cowden Street
Philadelphia, PA 19115

Sent via certified mail, return receipt requested, and via email to oksana@globalnetholdings.net, lee@globalnetholdings.net, noc@globalnetholdings.net, info@globalnetholdings.net, sales@globalnetholdings.net, billing@globalnetholdings.net

Re: NOTICE from the Anti-Robocall Multistate Litigation Task Force Concerning Global Net Holdings, Inc.'s Involvement in Suspected Illegal Robocall Traffic

Dear Ms. Grant:

The Anti-Robocall Multistate Litigation Task Force's ("Task Force")¹ ongoing investigation of Global Net Holdings, Inc. ("Global Net Holdings")² has shown that Global Net Holdings has transmitted, and continues to transmit, suspected illegal robocall traffic on behalf of one or more of its customers. This Notice is intended to apprise you of the Task Force's concerns regarding Global Net Holdings' call traffic, and to caution Global Net Holdings that it should scrutinize the call traffic of its current customers, evaluate the efficacy of its existing robocall mitigation policies, and cease transmitting illegal traffic on behalf of its current customers.

The Task Force requests that you take steps to prevent your network from continuing to be a source of apparently illegal robocalls. Transmission of these calls may be violations of the Telemarketing Sales Rule,³ the Telephone Consumer Protection Act,⁴ the Truth in Caller ID Act,⁵

¹ The Anti-Robocall Multistate Litigation Task Force is a 51-member bipartisan collective of State Attorneys General, led by the Attorneys General of Indiana, North Carolina, and Ohio, which is focused on actively investigating and pursuing enforcement actions against various entities in the robocall ecosystem that are identified as being responsible for significant volumes of illegal and fraudulent robocall traffic routed into and across the country.

² Global Net Holdings, Inc.—FCC Registration No. 0019927979; Robocall Mitigation Database Nos. RMD0004139, RMD0009352—"Global Net Holdings") is reportedly a Pennsylvania corporation. In the FCC's Robocall Mitigation Database, Oksana Grant is listed as Global Net Holdings' Chief Executive Officer.

³ 15 U.S.C. §§ 6101-6108; 16 C.F.R. §§ 310.3, 310.4.

⁴ 47 U.S.C. § 227; 47 C.F.R. § 64.1200.

⁵ 47 U.S.C. § 227(e); 47 C.F.R. § 64,1604.

as well as state consumer protection statutes. If, after receiving this Notice, Global Net Holdings continues to transmit calls for illegal robocall campaigns, the Task Force may decide to pursue an enforcement action against Global Net Holdings and its principal owners and/or operators.

Task Force’s Findings Regarding Global Net Holdings’ Call Traffic

As you are aware, on August 1, 2022, the Task Force issued its Civil Investigative Demand (“CID”) to Global Net Holdings to identify, investigate, and mitigate suspected illegal call traffic that is accepted onto, and transmitted across, Global Net Holdings’ network. Based on pertinent analyses and information available to the Task Force, it appears that Global Net Holdings is continuing to transmit calls associated with high-volume illegal and/or suspicious robocall campaigns.

As part of its investigation into the transmission of illegal robocalls and the providers and entities that originate and/or route them, the Task Force regularly reviews call traffic information from several industry sources, including USTelecom’s Industry Traceback Group (“ITG”)⁶ and ZipDX LLC (“ZipDX”).⁷

Call traffic data from the ITG shows that it issued at least **153 traceback notices** to Global Net Holdings since January 2019 for calls it accepted and/or transmitted onto and across the U.S. telephone network. These notices from the ITG cited recurrent high-volume illegal and/or suspicious robocalling campaigns concerning government and financial imposters and impersonations, Amazon suspicious charges, credit card interest rate reductions, Medicare scams, Chinese package delivery scams, cable discount scams, utility disconnect scams, and others, with

⁶ Established in 2015, the ITG is a private collaborative industry group—composed of providers across wireline, wireless, VOIP, and cable services—that traces and identifies the sources of suspected illegal and suspicious robocalls. In December 2019, Congress enacted the Pallone–Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (“TRACED Act”) to combat the scourge of unlawful robocalls. *See* Pub. L. No. 116-105, § 13(d), 133 Stat. 3274 (2019). Following its enactment, the Federal Communications Commission designated the ITG as the official private-led traceback consortium charged with leading the voice communications industry’s efforts to trace the origin of suspected illegal robocalls through various communications networks through tracebacks. *See* 47 C.F.R. § 64.1203.

⁷ ZipDX is a provider of web- and phone-based collaboration services, which also focuses resources on developing and making technology available that is directed at mitigating illegal robocalls and other telephone-based fraud and abuse. ZipDX’s proprietary tool “RRAPTOR” is one such technology, which is an automated robocall surveillance tool that captures call recordings and information for calls largely associated with high-volume suspicious calling campaigns, and identifies the providers who have affixed their SHAKEN signatures to each of the captured calls, indicating that the provider is in the call path and whether those providers have attested to knowing the calling party who made the suspicious call and/or knowing of the calling party’s right to use that calling number to make that suspicious call. *See* ZipDX, What is RRAPTOR?, <https://legalcallsonly.org/what-is-rraptor/> (last visited Oct. 17, 2024).

Global Net Holdings identified as serving primarily as the point-of-entry or gateway⁸ provider for most of this call traffic, and serving as the immediate downstream provider to the originating provider and as the originating provider itself for the remainder of this traffic. At least half of the traceback notices were sent to Global Net Holdings since August 2022, which is *after* the Task Force issued its CID to Global Net Holdings, and notices are still being issued in 2025. Because the ITG estimates that each traced call is representative of a large volume of similar illegal and/or suspicious calls,⁹ Global Net Holdings is likely causing significant volumes of illegal and/or suspicious robocalls to ultimately reach U.S. consumers, despite traceback notifications from the ITG of this identified and suspected illegal call traffic.

Further, ITG traceback data shows that Global Net Holdings reporting receiving illegal and/or suspicious robocalls directly from at least one foreign service provider not listed in the FCC’s Robocall Mitigation Database (“RMD”) at the time the calls were sent. ITG data shows that Global Net Holdings reported that calls were received from the foreign service provider edatelvoip.¹⁰ Providers may only accept calls directly from other domestic providers and foreign providers using U.S. telephone numbers in the caller ID field when those providers are listed in the RMD.¹¹ We note also that it appears Global Net Holdings has, in some instances, routed unauthenticated calls from foreign service providers while it was serving as a gateway provider in contravention of applicable rules and/or regulations.¹²

Information available from ZipDX indicates that Global Net Holdings also attested to calls for a number of the same high-volume robocalling campaigns for which it received and/or continues to receive traceback notices from the ITG. For instance, in the last year, ZipDX identified **355 suspicious calls** transmitted by Global Net Holdings **from 354 unique calling numbers**,¹³ exhibiting characteristics indicative of calls that are violations of federal and state

⁸ *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59; *Call Authentication Trust Anchor*, WC Docket No. 17-97; Report and Order, Order on Reconsideration, Order, and Further Notice of Proposed Rulemaking, 87 FR 42916, 42917–18, para. 7 (2022) (defining a “gateway provider” as “a U.S.-based intermediate provider that receives a call directly from a foreign originating provider or foreign intermediate provider at its U.S.-based facilities before transmitting the call downstream to another U.S.-based provider”).

⁹ USTelecom, *Industry Traceback Group Policies and Procedures*, at 4 (last revised April 2022) (*ITG Policies & Procedures*) (defining “campaign” as “[a] group of calls with identical or nearly identical messaging as determined by the content and calling patterns of the caller,” where “[a] single Campaign often represents hundreds of thousands or millions of calls”), *available at* <https://r01986.a2cdn1.secureserver.net/wp-content/uploads/2022/04/ITG-Policies-and-Procedures-Updated-Apr-2022.pdf>.

¹⁰ *See, e.g.*, ITG Traceback No. 19140.

¹¹ *See* 47 C.F.R. § 64.6305(g).

¹² *See* 47 C.F.R. § 64.6302(c); *see, e.g.*, ITG Traceback Nos. 24352, 24353.

¹³ The use of many unique calling numbers for this volume of called numbers indicates a suspicious pattern in your call traffic of “snowshoeing” or “snowshoe spoofing,” which is a practice often

laws; 94% of these calls were also made to numbers that have been registered on the National Do Not Call Registry.¹⁴ Additionally, about 35% of these calls were marked with a B-Level STIR/SHAKEN attestation, indicating that Global Net Holdings knows the identities of the calling parties that originated these suspicious calls.

Lastly, analysis of a portion of Global Net Holdings' likely involvement in the routing of nationwide call traffic concerning SSA government imposter robocalls was assessed. Between September 2020 and March 2021, among a nationwide sample of more than 937,700 transcribed and recorded SSA imposter robocalls, **approximately 59,833 of these SSA imposter robocalls are estimated to be attributable to Global Net Holdings.** Thus, of the over 468 million estimated SSA imposter robocalls reaching consumers across the country in this sample during this period, **approximately 29.9 million of these scam robocalls are estimated to be attributable to Global Net Holdings.**

After reviewing and analyzing the information available to the Task Force as a result of its investigation, the Task Force has concluded that Global Net Holdings is and/or has been involved in, at a minimum, transmitting call traffic indicative of, and associated with, recurrent high-volume illegal and/or suspicious robocalling campaigns and/or practices, which conduct could subject Global Net Holdings to damages, civil penalties, injunctions, and other available relief provided to State Attorneys General under both federal and state laws.

Overview of Select Relevant Laws

As Global Net Holdings well knows, originating and transmitting illegal robocalls are violations of the Telemarketing Sales Rule,¹⁵ the Telephone Consumer Protection Act,¹⁶ and/or the Truth in Caller ID Act,¹⁷ as well as state consumer protection statutes.

Telemarketing Sales Rule (15 U.S.C. §§ 6101–6108; 16 C.F.R. Part 310)

In 1994, Congress passed the Telemarketing and Consumer Fraud and Abuse Prevention Act which directed the FTC to prescribe rules prohibiting deceptive telemarketing acts or

employed by illegal robocallers and telemarketers to circumvent the protections of the STIR/SHAKEN call authentication framework by using significant quantities of unique numbers for caller IDs on a short-term or rotating basis in order to evade behavioral analytics detection, or to bypass or hinder call blocking or call labeling analytics based on the origination numbers. Telephone numbers used for snowshoeing sometimes cannot themselves receive incoming calls, which has the effect of impeding an audit of the legitimacy of these calling numbers.

¹⁴ Most calls captured by RRAPTOR are calls made to phone numbers that have been registered on the National Do Not Call Registry.

¹⁵ 15 U.S.C. §§ 6101–6108; 16 C.F.R. §§ 310.3, 310.4.

¹⁶ 47 U.S.C. § 227; 47 C.F.R. § 64.1200.

¹⁷ 47 U.S.C. § 227(e); 47 C.F.R. § 64.1604.

practices.¹⁸ Pursuant to this directive, the FTC promulgated the Telemarketing Sales Rule (“TSR”). It is a violation of the TSR for voice service providers to provide substantial assistance to customers that the provider “knows or consciously avoids knowing” are engaged in practices that violate TSR provisions against deceptive and abusive telemarketing acts or practices.¹⁹ State Attorneys General have concurrent authority with the FTC to sue to obtain damages, restitution, or other compensation on behalf of their citizens for violations of the TSR.²⁰

Telephone Consumer Protection Act (47 U.S.C. § 227; 47 C.F.R. §§ 64.1200 and 64.1604)

Under the Telephone Consumer Protection Act (“TCPA”), the FCC promulgated rules restricting calls made with automated telephone dialing systems and calls delivering artificial or prerecorded voice messages.²¹ Additionally, the TCPA generally prohibits solicitation calls placed to numbers on the National Do Not Call Registry.²² State Attorneys General are authorized to bring enforcement actions to enjoin violative calls and recover substantial civil penalties for *each violation* of the TCPA.²³ The TCPA exempts from its prohibitions calls made for emergency purposes and certain other calls,²⁴ including those made with the “prior express consent” of the called party or with “prior express *written* consent” of the called party for telemarketing calls.²⁵ Note, however, the FCC has found in at least one instance that single consents purportedly given by a consumer to large groups of marketers listed on an alternate webpage are insufficient to satisfy this exemption.²⁶

¹⁸ 15 U.S.C. § 6102.

¹⁹ 16 C.F.R. § 310.3(b).

²⁰ 15 U.S.C. § 6103; 16 C.F.R. § 310.7.

²¹ 47 U.S.C. § 227(b)(1)(A)(iii), (b)(1)(B); 47 C.F.R. § 64.1200(a)(1)–(3).

²² 47 U.S.C. § 227(c); 47 C.F.R. § 64.1200(c)(2).

²³ 47 U.S.C. § 227(g)(1).

²⁴ 47 U.S.C. § 227(b)(1)(A)–(B), (b)(2)(B); 47 C.F.R. § 64.1200(a)(1)–(3), (a)(9).

²⁵ 47 U.S.C. § 227(b)(1)(A)–(B); 47 C.F.R. § 64.1200(a)(1)–(3), (f)(9).

²⁶ For example, in November 2022, the FCC issued an order requiring all voice service providers to block calls from provider Urth Access, LLC. In response to allegations concerning the transmission of illegal robocalls, Urth Access claimed to have obtained express consent for each of the calls. However, that consent stemmed from websites where consumers purportedly agreed to receive robocalls from over 5,000 “marketing partners” listed on a separate site. The FCC found this type of practice insufficient to constitute express consent to the marketing partners to contact the consumers. *See FCC Orders Voice Service Providers to Block Student Loan Robocalls*, <https://www.fcc.gov/document/fcc-orders-voice-service-providers-block-student-loan-robocalls> (Order); *FCC Issues Robocall Cease-and-Desist Letter to Urth Access*, <https://www.fcc.gov/document/fcc-issues-robocall-cease-and-desist-letter-urth-access> (Cease-and-Desist Letter). We note that this decision is consistent with the FTC’s interpretation of the express consent requirement of the TSR. *See* Federal Register, Vol. 73 No. 169, 2008 at 51182,

Truth in Caller ID Act (47 U.S.C. § 227(e))

Under the federal Truth in Caller ID Act, it is generally unlawful for a person to “knowingly transmit misleading or inaccurate caller identification information with the intent to defraud, cause harm, or wrongfully obtain anything of value.”²⁷ State Attorneys General have the authority to bring enforcement actions for violations of the Truth in Caller ID Act and its prohibition against illegal caller identification spoofing.²⁸ Such violative conduct can lead to assessments of civil penalties of up to \$10,000 for each violation, or three times that amount for each day of continuing violations.²⁹ Note that any penalties for violations of the Truth in Caller ID Act are in addition to those assessed for any other penalties provided for by the TCPA.³⁰

General Note regarding State Laws

In addition to their authority to enforce the above federal statutes, State Attorneys General are empowered to enforce their respective state laws regulating various aspects of the initiation and transmission of illegal robocall and telemarketing call traffic across the U.S. telephone network. Voice service providers transmitting calls into and throughout the states are obligated to familiarize themselves with, and abide by, all applicable state laws.

Requested Action in Response to this Notice

The Task Force is providing this Notice in order to memorialize some of its investigative findings to date. The Task Force requests that you review this Notice in detail and carefully scrutinize and actively investigate any suspected illegal call traffic that is, and has been, accepted and transmitted by and through Global Net Holdings’ network, in order to ensure that your current business—and any subsequently-formed businesses—follow all applicable federal and state laws and regulations, including those referenced above. If subsequent investigation shows that Global Net Holdings and/or its principals continue to assist customers by initiating and/or transmitting call traffic not dissimilar from the traffic highlighted in this Notice, the Task Force may decide to pursue an enforcement action against Global Net Holdings, any later-formed business entities, and

<https://www.govinfo.gov/content/pkg/FR-2008-08-29/pdf/E8-20253.pdf> (consumer’s agreement with a seller to receive calls delivering prerecorded messages is nontransferable); *FTC, Complying with the Telemarketing Sales Rule, The Written Agreement Requirement*, <https://www.ftc.gov/business-guidance/resources/complying-telemarketing-sales-rule#writtenagreement>; *but see, Insurance Marketing Coalition, Ltd. v. Federal Communications Commission*, -- F.4th --, 2025 WL 289152 (11th Cir. 2025) (vacating and remanding FCC rule requiring those wishing to make a telemarketing or advertising robocall to obtain (1) consent from one called party to one seller at a time; and (2) consent that is logically and topically related to the interaction that prompted the consent).

²⁷ 47 U.S.C. § 227(e)(1); 47 C.F.R. § 64.1604.

²⁸ 47 U.S.C. § 227(e)(6).

²⁹ 47 U.S.C. § 227(e)(5)(A), (e)(6)(A).

³⁰ *Id.*

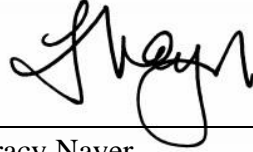
the principal owners and operators in common to both. Future action may also consist of referring the matter to the FCC for consideration of potential enforcement actions.³¹

For your information, we have informed several of our federal law enforcement counterparts—including our colleagues at the FCC’s Enforcement Bureau—of the Task Force’s intention to issue this Notice to Global Net Holdings. Finally, this Notice does not waive or otherwise preclude the Task Force from bringing an enforcement action related to conduct preceding the date of this Notice, including conduct that resulted in violations related to the call traffic referenced in this Notice.

³¹ The FCC’s authorities are broad and may allow for several potential enforcement actions, including a Cease-and-Desist Letter, *see, e.g., FCC Orders Avid Telecom to Cease and Desist Robocalls* <https://www.fcc.gov/document/fcc-orders-avid-telecom-cess-and-desist-robocalls> (issued Jun. 7, 2023); *FCC Issues Robocall Cease-and-Desist Letter to PZ/Illum*, <https://www.fcc.gov/document/fcc-issues-robocall-cess-and-desist-letter-pzillum> (issued Oct. 21, 2021), a K4 Public Notice, *see FCC Enforcement Bureau Notifies All U.S.-Based Providers of Rules Permitting Them to Block Robocalls Transmitting From One Eye LLC*, <https://www.fcc.gov/document/fcc-takes-repeat-robocall-offenders-attempts-evade-enforcement> (issued Feb. 15, 2023), a Notice of Apparent Liability, *see, e.g., John C. Spiller; Jakob A. Mears; Rising Eagle Capital Group LLC; JSquared Telecom LLC; Only Web Leads LLC; Rising Phoenix Group; Rising Phoenix Holdings; RPG Leads; and Rising Eagle Capital Group – Cayman*, Notice of Apparent Liability for Forfeiture, 35 FCC Rcd 5948 (2020), *available at* https://docs.fcc.gov/public/attachments/FCC-20-74A1_Rcd.pdf, a Consumer Communications Information Services Threat (“C-CIST”) Designation Notice, *see FCC [Enforcement Bureau] Issues C-CIST Classification for “Royal Tiger”*, <https://www.fcc.gov/document/fcc-eb-issues-c-cist-classification-royal-tiger> (issued May 13, 2024), or proceedings that may result in removal from the Robocall Mitigation Database, *see, e.g., Viettel Business Solutions Company, Etihad Etisalat (Mobily), Claude ICT Poland Sp. z o. o. dba TeleCube.PL, Nervill LTD, Textodog Inc. dba Textodog and Textodog Software Inc., Phone GS, Computer Integrated Solutions dba CIS IT & Engineering, Datacom Specialists, DomainerSuite, Inc., Evernex SMC PVT LTD, Humbolt Voip, and My Taxi Ride Inc.*, Removal Order, 39 FCC Rcd 1319 (2024), *available at* <https://www.fcc.gov/document/fcc-removes-12-entities-robocall-mitigation-database>, the latter of which—if completed—would require all intermediate providers and terminating voice service providers to cease accepting your call traffic.

The Task Force remains steadfast in its resolve to meaningfully curb illegal robocall traffic. Please direct any inquiries regarding this Notice to my attention at tnayer@ncdoj.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Tracy Nayer", written over a horizontal line.

Tracy Nayer
Special Deputy Attorney General
Consumer Protection Division
North Carolina Department of Justice