



Federal Communications Commission  
Enforcement Bureau  
45 L Street, NE  
Washington, DC 20554

July 7, 2022

**VIA ELECTRONIC DELIVERY AND CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

**To:** Davinder Singh  
President  
Mobi Telecom LLC  
1309 Coffeen Ave #1200  
Sheridan, WY 82801  
[davinder@mobitelecom.net](mailto:davinder@mobitelecom.net)

**Re: Official Correspondence from the Federal Communications Commission**

Dear Mr. Singh:

We have determined that Mobi Telecom LLC (“Mobi Telecom”) is apparently transmitting illegal robocall traffic on behalf of one or more of its clients. You should investigate and, if necessary, cease transmitting such traffic immediately and take steps to prevent your network from continuing to be a source of apparently illegal robocalls. As noted below, downstream voice service providers will be authorized to **block all** of Mobi Telecom’s traffic if you do not take steps to “effectively mitigate illegal traffic” within 48 hours, or if you fail to inform the Commission and the Traceback Consortium within fourteen (14) days of this letter (Thursday, July 21, 2022) of the steps you have taken to “implement effective measures” to prevent customers from using your network to make illegal calls.<sup>1</sup>

**Why You Are Receiving This Notification.** You are receiving this letter because one or more investigations conducted by the Commission, in conjunction with the Traceback Consortium, revealed that Mobi Telecom apparently transmitted multiple illegal robocall campaigns from the sources listed in Attachment A. These robocalls are connected with a robocalling enterprise led by Roy Cox, Jr., Aaron Michael Jones, their individual associates, and associated entities (collectively, the Cox/Jones/Sumco Panama Operation).<sup>2</sup> The calls are prerecorded advertising solicitations that apparently were made without consent of the called parties and absent an emergency purpose, in violation of section 227(b) of the Telephone Consumer Protection Act.<sup>3</sup> The calls apparently were made with the intent to violate the

---

<sup>1</sup> See 47 CFR § 64.1200(k)(4).

<sup>2</sup> The Cox/Jones/Sumco Panama Operation includes the following individuals: Roy Melvin Cox Jr., resident of Tustin, California; Aaron Michael Jones, resident of Orange County, California; Scott Presta, resident of Lakeway, Texas; Kathleen Presta, resident of Lakeway, Texas; Stacey Yim, resident of La Crescenta, California; Jovita Migdaris Cedeno Luna, resident of San Francisco, Panama; Livia Szuromi, resident of Budapest, Hungary; Maria Alejandra Gonzalez; Davinder Singh; Andrea Baloghne Horvath, resident of Budapest, Hungary; Adam Radimiri; June Batista, resident of Costa Mesa, California; and Julie K. Bridge, resident of Upland, California. The Cox/Jones/Sumco Panama Operation also includes the following entities: Sumco Panama S.A.; Sumco Panama Inc.; Tech Direct LLC; Posting Express Inc.; 7 Sundays Inc.; and Texas Outdoor Adventures Inc.

<sup>3</sup> Telephone Consumer Protection Act of 1991, 1991 Enacted S. 1462, 102 Enacted S. 1462, 105 Stat. 2394; 47 U.S.C. § 227.

Telephone Consumer Protection Act of 1991, in violation of the TRACED Act,<sup>4</sup> and the calls displayed inaccurate or misleading caller identification, with an apparent intent to defraud, cause harm, or wrongfully obtain something of value, in violation of the Truth in Caller ID Act.<sup>5</sup> Moreover, one of the individuals involved, Roy Cox, entered into a settlement with the Department of Justice and the Federal Trade Commission in which he accepted a permanent ban on all telemarketing activities.<sup>6</sup> Call detail records obtained by the Bureau via the Traceback Consortium indicate that the calls either directly originated from, or were carried by, each of the Originating Providers.<sup>7</sup>

**Actions You Should Take Now.** Mobi Telecom should take the following steps to resolve this matter:

1. Promptly investigate the transmissions identified in Attachment A.
2. If necessary, “effectively mitigate” the identified unlawful traffic by determining the source of the traffic and preventing that source from continuing to originate such traffic.
3. Implement effective safeguards to prevent customers from using your network as a platform to originate illegal calls.
4. Within 48 hours, inform the Commission and the Traceback Consortium of steps taken to mitigate the identified apparent illegal traffic.
5. Within fourteen (14) days of the date of this letter (Thursday, July 21, 2022) inform the Commission and the Traceback Consortium of the steps Mobi Telecom is taking to prevent customers from using its network to transmit illegal robocalls.<sup>8</sup> You must also include a declaration attesting to the truthfulness and accuracy of your response under section 1.17 of the Commission’s rules.<sup>9</sup> Failure to provide this information within 14 days shall be equivalent to having failed to put effective measures in place.<sup>10</sup>

**Consequences for Failure to Comply.** If after 48 hours of issuance of this letter Mobi Telecom continues to route or transmit harmful robocall traffic, we will advise downstream voice service providers that, pursuant to section 64.1200(n)(2) of the Commission's rules, they must investigate the identified traffic and take steps to effectively mitigate the illegal calls.<sup>11</sup>

---

<sup>4</sup> Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, § 3, Pub. L. No. 116-105, 133 Stat. 3274 (2019) (codified as amended in 47 U.S.C. § 227).

<sup>5</sup> Truth in Caller ID Act of 2009, Pub. L. No. 111-331, codified at 47 U.S.C. § 227(e).

<sup>6</sup> *U.S. v. Roy M. Cox, Jr. et al*, No. 8:11-cv-01910-DOC-JPR (C.D. Cal. 2013).

<sup>7</sup> See call detail record information on file in FCC File No. EB-21-00031913.

<sup>8</sup> See *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Third Report and Order, Order on Reconsideration, and Fourth Further Notice of Proposed Rulemaking, 35 FCC Rcd 7614, 7630, para. 43 (2020) (*Call Blocking Safe Harbor Report and Order*).

<sup>9</sup> 47 CFR § 1.17. See also 47 CFR § 1.16 (describing the format of such declarations).

<sup>10</sup> You are encouraged to reach out to the Commission before the deadline if you anticipate needing more time to execute this step.

<sup>11</sup> In July 2020, the Commission adopted the *Call Blocking Safe Harbor Report and Order*, which authorized voice service providers to block illegal robocalls. *Call Blocking Safe Harbor Report and Order*, 35 FCC Rcd 7614; see also 47 CFR § 64.1200(k)(3)-(4). If the Commission identifies illegal traffic, based on information obtained through traceback such as that provided by the Traceback Consortium, the Commission may notify the voice service provider that it is transmitting identified probable illegal calls (or “bad traffic”) and, upon receipt of notification, the voice service provider should investigate promptly and take any steps that may be necessary to prevent the illegal

Furthermore, if Mobi Telecom fails to take sufficient mitigating actions to prevent its network from continuing to be used to transmit illegal robocalls, then downstream U.S.-based providers may be required to block Mobi Telecom's traffic. **Failure to act within the deadlines may require U.S.-based voice service providers to block all call traffic transmitting from your network, permanently.**

Please direct any inquiries or responses regarding this letter to Jessica Manuel, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, FCC, at [jessica.manuel@fcc.gov](mailto:jessica.manuel@fcc.gov) or (202) 418-1305; and Raul Rojo, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, FCC, at [raul.rojo@fcc.gov](mailto:raul.rojo@fcc.gov) or (202) 418-1336; and cc: to Kristi Thompson, Division Chief, Telecommunications Consumers Division, Enforcement Bureau, FCC, at [kristi.thompson@fcc.gov](mailto:kristi.thompson@fcc.gov). A copy of this letter has been sent to the Traceback Consortium.

Sincerely,

---

Loyaan A. Egal  
Acting Bureau Chief  
Enforcement Bureau  
Federal Communications Commission

---

caller from continuing to use the network to make such calls. Furthermore, if the notified voice service provider fails to take effective mitigation measures within 48 hours, any downstream voice service provider may block the calls from the notified provider. *Call Blocking Safe Harbor Report and Order*, 35 FCC Rcd at 7628-29, para. 39. Any voice service provider that decides to block traffic from the bad actor provider must notify the Commission of its decision and provide a brief summary of its basis for making such a determination prior to initiating blocking. *Id.* at 7630, para. 42; 47 CFR § 64.1200(k)(4). If the notified voice service provider fails to implement effective measures to prevent new and renewing customers from using its network to originate illegal calls, other downstream voice service providers may block the calls from the notified provider. *Call Blocking Safe Harbor Report and Order*, 35 FCC Rcd at 7630 para. 43; 47 CFR § 64.1200(k)(3)-(4). A voice service provider that decides to block traffic from the bad actor provider must notify the Commission of its decision and provide a brief summary of its basis for making such a determination prior to initiating blocking. *Id.* at 7630, para. 43; 47 CFR § 64.1200(k)(4).

**ATTACHMENT A**

<b>Customer</b>	<b>Date of Call</b>	<b>Date of ITG Notification</b>	<b>Caller ID</b>	<b>Called Number</b>	<b>Description</b>	<b>Violation</b>
Virtual Telecom Kft / Technologic	Jan 19, 2022 17:01 UTC	Jan 21, 2022 19:20 UTC			Auto Warranty	47 USC 227(b); 47 CFR 64.1200(a)
Virtual Telecom Kft / Technologic	Jan 19, 2022 17:09 UTC	Jan 21, 2022 19:31 UTC			Auto Warranty	47 USC 227(b); 47 CFR 64.1200(a)
Virtual Telecom Kft / Technologic	Jan 19, 2022 17:29 UTC	Jan 21, 2022 19:26 UTC			Auto Warranty	47 USC 227(b); 47 CFR 64.1200(a)
Virtual Telecom Kft / Technologic	Jan 19, 2022 17:56 UTC	Jan 21, 2022 19:20 UTC			Auto Warranty	47 USC 227(b); 47 CFR 64.1200(a)
Virtual Telecom Kft / Technologic	Jan 19, 2022 18:04 UTC	Jan 21, 2022 19:21 UTC			Auto Warranty	47 USC 227(b); 47 CFR 64.1200(a)
Virtual Telecom Kft / Technologic	Jan 19, 2022 18:07 UTC	Jan 21, 2022 21:28 UTC			Auto Warranty	47 USC 227(b); 47 CFR 64.1200(a)
Virtual Telecom Kft / Technologic	Jan 19, 2022 18:38 UTC	Jan 21, 2022 17:31 UTC			Auto Warranty	47 USC 227(b); 47 CFR 64.1200(a)
Virtual Telecom Kft / Technologic	Feb 23, 2022 20:48 UTC	Feb 25, 2022 18:03 UTC			Auto Warranty	47 USC 227(b); 47 CFR 64.1200(a)