



**Federal Communications Commission**  
Enforcement Bureau  
Telecommunications Consumers Division  
45 L Street, NE  
Washington, DC 20554

April 4, 2024

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

**To:** Veriwave Telco, LLC  
Felix Hernandez  
Compliance Officer  
8 The Green, Suite A  
Dover, DE 19901  
[michele@veriwavetelco.com](mailto:michele@veriwavetelco.com)

**Re: Notification of Suspected Illegal Traffic**

Dear Felix Hernandez,

Veriwave Telco, LLC (Veriwave or Company) is apparently originating illegal robocall traffic. The Enforcement Bureau (Bureau) of the Federal Communications Commission (FCC or Commission) provides this letter as notice of important legal obligations and steps Veriwave must take to address this apparently illegal traffic. Failure to comply with the steps outlined in this letter **may result in downstream providers permanently blocking all of Veriwave's traffic.**

**I. Background**

YouMail, Inc. (YouMail)<sup>1</sup> estimates that between November 1, 2023 and January 31, 2024, approximately 15.8 million robocalls playing prerecorded messages pertaining to an unknown<sup>2</sup> "National Tax Relief Program" were placed to call recipients (recipients).<sup>3</sup> This robocalling campaign increased in volume in the three months immediately preceding the 2024 filing season start date.<sup>4</sup> This start date, and the lead up to it, may be particularly stressful for tax filers with arrears from prior years as their 2023 tax refund could be subject to withholding by the Internal Revenue Service.<sup>5</sup> This robocall campaign apparently preyed upon these filers.

USTelecom's Industry Traceback Group (ITG)<sup>6</sup> conducted tracebacks on 23 calls associated with the "National Tax Relief Program" made to wireless numbers between November 30, 2023 and January

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<sup>1</sup> YouMail is a third-party robocall identification and blocking service. *See About Us*, YouMail, <https://www.youmail.com/home/corp/about> (last visited Mar. 4, 2024).

<sup>2</sup> The Bureau has found no evidence of the existence of the "National Tax Relief Program."

<sup>3</sup> *See Daily Call Volume per Campaign*, YouMail, Inc., <https://app.sigmacomputing.com/youmailinc/workbook/> (last visited Mar. 19, 2023) (on file at EB-TCD-24-00036355).

<sup>4</sup> *Id.*; *2024 Tax Filing Season Set for January 29; IRS Continues to Make Improvements to Help Taxpayers*, Internal Revenue Serv. (Jan. 8, 2024), <https://www.irs.gov/newsroom/2024-tax-filing-season-set-for-january-29-irs-continues-to-make-improvements-to-help-taxpayers#:~:text=January%2029%3A%20Filing%20season%20start,Due%20date%20for%20extension%20filers> (explaining the IRS began accepting 2023 tax returns on January 29, 2024).

<sup>5</sup> *See Topic No. 201, The Collection Process*, Internal Revenue Serv., <https://www.irs.gov/taxtopics/tc201> (last visited Mar. 19, 2024) ("[A]ny future federal tax refunds or state income tax refunds that you're due may be seized and applied to your federal tax liability").

<sup>6</sup> The ITG is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks. *See Implementing Section 13(d) of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence*

29, 2024.<sup>7</sup> All 23 calls, identified in Attachment A to this Notice, were part of an apparently illegal robocalling campaign featuring artificial or prerecorded voice messages from the “National Tax Relief Program” offering purported tax debt relief services under the same name.<sup>8</sup> Multiple messages were part of the campaign, but each pre-recorded message began by saying that the caller was contacting the called party to ensure the recipient received information on the new National Tax Relief Program.<sup>9</sup> Many of the messages further appealed to recipients with the offer to “rapidly clear” their tax debt with the National Tax Relief Program.<sup>10</sup> After describing the supposed benefit of the program, some recordings then prompted recipients to answer as to whether they owed any taxes.<sup>11</sup> In some instances, such as in the example transcript below, the recordings asked the recipient whether they had any tax debt, described the requirements of the program, and prompted them to press one to confirm if they qualified for the “special program”:<sup>12</sup>

Alright, uh, so I've been tasked to personally contact you and make sure that you have been provided the information about the new National Tax Relief Program. This relevant information is extremely important with helping those that owe back taxes to rapidly clear their debt. So can you tell me if you currently owe any back taxes at this time? Ok, let me go ahead and get you this information then. One moment please. Here we go.

Ok, so this special program has been recently approved as of August 2022. The purpose of the Tax Dismissal Program is to help those struggling with tax debt. However, there's certain requirements to be eligible. You cannot currently be in any other tax debt consolidation or settlement program. You cannot currently be in bankruptcy and you must have a household income of under \$250,000 a year, but you do have to have a monthly income of at least \$2,000 a month. So I need to ask you, do you meet these minimum requirements for eligibility? Press 1 for yes, 2 for no.<sup>13</sup>

If the recipient connected to a live operator, the live operator reportedly asked for personal information, including date of birth and social security number.<sup>14</sup> The calls did not provide any call back number.<sup>15</sup>

The ITG investigated the traceback calls and determined that Veriwave was the originating provider.<sup>16</sup> The ITG notified Veriwave of these calls and provided the Company with supporting data

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*Act (TRACED Act)*, EB Docket No. 20-22, Report and Order, DA 23-719, 2023 WL 5358422, at \*1, para. 1 (EB Aug. 18, 2023).

<sup>7</sup> See Traceback Consortium Subpoena Response (Jan. 31, 2024) (on file at EB-TCD-24-00036355); Traceback Consortium Subpoena Response (Mar. 5, 2024) (on file at EB-TCD-24-00036355) (collectively, ITG Subpoena Responses).

<sup>8</sup> See ITG Subpoena Responses.

<sup>9</sup> See *id.*

<sup>10</sup> See *id.*

<sup>11</sup> See *id.*

<sup>12</sup> See *id.*

<sup>13</sup> See *id.*

<sup>14</sup> See FCC Complaint #6613274 (Nov. 30, 2023) (on file at EB-TCD-24-00036355) (“It goes on and on and on. They ask horrible personal questions.”); see also FCC Complaint #6515954 (Oct. 12, 2023) (on file at EB-TCD-24-00036355).

<sup>15</sup> See ITG Subpoena Responses, *supra* note 7.

<sup>16</sup> See *id.*

identifying each call.<sup>17</sup> Veriwave did not contest it had originated the calls and identified one client as the source of all of the calls.<sup>18</sup> Veriwave did not offer evidence of consent for the calls or contest the unlawful nature of the calls.<sup>19</sup> Nor did Veriwave contest that any exceptions to the rules applied.<sup>20</sup> The Bureau reached out to Veriwave via the email address Veriwave provided to the Bureau for communication about robocall mitigation, but the email was returned as undeliverable.<sup>21</sup>

## II. Apparent Violations

The Company has an ongoing obligation to protect its network from being used to originate illegal traffic, which it apparently failed to do.<sup>22</sup>

### A. The Identified Traffic Was Apparently Illegal

It is unlawful to place calls to cellphones containing artificial or prerecorded voice messages absent an emergency purpose or prior express consent.<sup>23</sup> Furthermore, artificial or prerecorded voice message calls to cellphones that introduce an advertisement or constitute telemarketing<sup>24</sup> are illegal absent prior express *written* consent.<sup>25</sup> Here, the identified calls all featured artificial or prerecorded voice messages and were placed to cell phones.<sup>26</sup> Multiple identified calls also included advertisements promoting the quality of the National Tax Relief Program’s services through reference to the efficiency with which consumers’ debts could be reduced.<sup>27</sup> The Company has not provided any evidence of prior express consent, written or otherwise, or an emergency purpose.<sup>28</sup> Accordingly, the calls were apparently illegal.<sup>29</sup>

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<sup>17</sup> *See id.*

<sup>18</sup> *See id.*

<sup>19</sup> *See id.*

<sup>20</sup> *See id.*

<sup>21</sup> *See* Automatic response to e-mail from Caitlin Barbas, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, to Felix Hernandez, Compliance Officer, Veriwave Telco, LLC, (Feb. 2, 2024) (on file at EB-TCD-24-00036355) (showing email could not be delivered as the host platform was not found). The Bureau’s email attempt also included the two email addresses provided to the Bureau by the ITG. *See id.*; *see also* ITG Subpoena Responses, *supra* note 7.

<sup>22</sup> *See* 47 CFR § 64.1200(n)(4).

<sup>23</sup> 47 U.S.C. § 227(b)(1)(A); 47 CFR § 64.1200(a)(1).

<sup>24</sup> *See* 47 CFR § 64.1200(f)(1) (“The term ‘advertisement’ means any material advertising the commercial availability or quality of any property, goods, or services.”); *id.* § 64.1200(f)(13) (“The term ‘telemarketing’ means the initiation of a telephone call or message for the purpose of encouraging the purchase or rental of, or investment in, property, goods, or services, which is transmitted to any person.”).

<sup>25</sup> *Id.* § 64.1200(a)(2)-(3).

<sup>26</sup> *See* ITG Subpoena Responses, *supra* note 7.

<sup>27</sup> *See id.*; *see also* 47 USC § 227(a)(5) (“The term ‘unsolicited advertisement’ means any material advertising the commercial availability or *quality* of any property, goods, or services which is transmitted to any person without that person’s prior express invitation or permission, in writing or otherwise.”) (emphasis added); 47 CFR § 64.1200(f)(1) (“The term ‘advertisement’ means any material advertising the commercial availability or *quality* of any property, goods, or services.”) (emphasis added).

<sup>28</sup> *See* ITG Subpoena Responses, *supra* note 7.

<sup>29</sup> 47 U.S.C. § 227(b)(1)(A); 47 CFR § 64.1200(a)(1)-(2).

## **B. The Company Apparently Originated the Identified Traffic**

An originating provider has an ongoing obligation to take affirmative, effective measures to prevent new and renewing customers from using its networks to originate illegal calls, including by knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic.<sup>30</sup> A provider's failure to protect its network can ultimately result in downstream providers permanently blocking all of the provider's traffic.<sup>31</sup> Here, the Company does not dispute that it originated the calls, or that they were illegal.<sup>32</sup>

## **III. Potential Consequences**

As a result of apparently originating illegal calls, the Company potentially faces permissive blocking under section 64.1200(k)(4)<sup>33</sup> of the Commission's rules, mandatory blocking under section 64.1200(n)<sup>34</sup> of the Commission's rules, and additional consequences under section 64.6305(g)<sup>35</sup> of the Commission's rules.

### **A. The Company Faces Permissive Blocking Under Section 64.1200(k)(4)**

Under the safe harbor set forth in section 64.1200(k)(4) of the Commission's rules, any downstream provider may (without any liability under the Communications Act of 1934, as amended, or the Commission's rules) block all traffic from an upstream originating or intermediate provider that, when notified by the Commission, fails to either (a) effectively mitigate illegal traffic within 48 hours or (b) implement effective measures to prevent new and renewing customers from using its network to originate illegal calls.<sup>36</sup> Prior to initiating blocking, the downstream provider shall provide the Commission with notice and a brief summary of the basis for its determination that the originating or intermediate provider meets one or more of these two conditions for blocking.<sup>37</sup>

This letter provides notice, pursuant to section 64.1200(k)(4), that Veriwave should effectively mitigate illegal traffic within 48 hours and implement effective measures to prevent new and renewing customers from using its network to originate illegal calls within 14 days of this letter in order to avoid having its traffic blocked by downstream providers.<sup>38</sup> The Company should inform the Commission and the ITG, within 48 hours of the delivery date of this letter, of the specific steps it has taken to mitigate illegal traffic on its network.<sup>39</sup>

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<sup>30</sup>47 CFR § 64.1200(n)(4).

<sup>31</sup> See *id.* § 64.1200(n)(2)-(3).

<sup>32</sup> See ITG Subpoena Responses, *supra* note 7.

<sup>33</sup> 47 CFR § 64.1200(k)(4).

<sup>34</sup> *Id.* § 64.1200(n).

<sup>35</sup> *Id.* § 64.6305(g).

<sup>36</sup> *Id.* § 64.1200(k)(4).

<sup>37</sup> *Id.*

<sup>38</sup> See *id.*

<sup>39</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. 42 (2020).

**B. The Company Faces Mandatory Blocking Under Section 64.1200(n)(2)**

The Commission may order all providers that are immediately downstream to block all traffic from an upstream provider that does not comply with the obligations identified in section 64.1200(n)(2) of the Commission’s rules.<sup>40</sup>

This letter serves as a Notification of Suspected Illegal Traffic (Notice) under section 64.1200(n)(2) of the Commission’s rules.<sup>41</sup> The Company must take the following actions in response to this Notice:

1. Promptly investigate the traffic identified in Attachment A for which the Company served as the originating provider;<sup>42</sup>
2. If the Company’s investigation determines that the Company served as the originating or gateway provider for the identified traffic, block or cease accepting all of the identified traffic within 14 days of the date of this Notice and continue to block or cease accepting the identified traffic, as well as substantially similar traffic, on an ongoing basis;<sup>43</sup>
3. Report the results of the Company’s investigation to the Bureau within 14 days of the date of this Notice.<sup>44</sup>

Depending on the outcome of the investigation, the report must contain certain details as described below:<sup>45</sup>

1. If the Company determines it is the originating or gateway provider for the identified traffic and does not conclude the traffic is legal, the report must include: (i) a certification that the Company is blocking the identified traffic and will continue to do so, and (ii) a description of the Company’s plan to identify and block or cease accepting substantially similar traffic on an ongoing basis;<sup>46</sup>
2. If the Company determines that the identified traffic is not illegal, the report must provide: (i) an explanation as to why the Company reasonably concluded that the identified traffic is not illegal, and (ii) what steps it took to reach that conclusion;<sup>47</sup> and
3. If the Company determines that it did not serve as the originating or gateway provider for any of the identified traffic, the report must: (i) provide an explanation as to how the Company reached that conclusion, and (ii) if it is a non-gateway intermediate or terminating provider for the identified traffic, identify the upstream provider(s) from which the Company received the identified traffic and, if possible, take steps to mitigate the traffic.<sup>48</sup>

**1. Initial Determination Order**

The Bureau may issue an Initial Determination Order stating the Bureau’s initial determination that Veriwave is not in compliance with section 64.1200 of the Commission’s rules if: (a) the Company

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<sup>40</sup> 47 CFR § 64.1200(n)(3).

<sup>41</sup> *Id.* § 64.1200(n)(2).

<sup>42</sup> *Id.* § 64.1200(n)(2)(i)(A).

<sup>43</sup> *See id.*

<sup>44</sup> *See id.*

<sup>45</sup> *Id.* § 64.1200(n)(2)(i)(A).

<sup>46</sup> *See id.*

<sup>47</sup> *Id.* § 64.1200(n)(2)(i)(B).

<sup>48</sup> *Id.*

fails to respond to this Notice; (b) the Company provides an insufficient response; (c) the Company continues to originate substantially similar traffic or allow substantially similar traffic onto the U.S. network after the 14-day period identified above; or (d) the Bureau determines the traffic is illegal despite the Company’s assertions to the contrary.<sup>49</sup> If the Bureau issues an Initial Determination Order, the Company will have an opportunity to respond.<sup>50</sup>

## **2. Final Determination Order**

The Bureau may issue a Final Determination Order in EB Docket No. 22-174 concluding that the Company is not in compliance with section 64.1200 of the Commission’s rules and directing all downstream providers both to block and cease accepting all traffic from Veriwave beginning 30 days from the release of the Final Determination Order if: (a) the Company does not provide an adequate response to the Initial Determination Order within the timeframe specified in the Initial Determination Order; or (b) the Company continues to originate or allow substantially similar traffic onto the U.S. network.<sup>51</sup> A Final Determination Order may be issued up to one year after the release date of the Initial Determination Order.<sup>52</sup>

### **C. The Company Faces Removal from the Robocall Mitigation Database Under Section 64.6305(g)**

Pursuant to section 64.6305(g) of the Commission’s rules, intermediate and voice service providers shall only accept traffic from a domestic voice service provider or gateway provider if that provider’s filing appears in the Robocall Mitigation Database (RMD).<sup>53</sup> An originating provider’s filing in the RMD must also include identification and contact information, including the “name, title, department, business address, telephone number, and email address of one person within the company responsible for addressing robocall mitigation-related issues.”<sup>54</sup> Further, such filings must include the specific reasonable steps the provider has taken to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program.<sup>55</sup> If a company’s filing is deficient in some way, the Bureau may initiate a proceeding to remove it.<sup>56</sup>

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<sup>49</sup> *Id.* § 64.1200(n)(2)(ii).

<sup>50</sup> *Id.*

<sup>51</sup> *Id.* § 64.1200(n)(2)(iii), (3); *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59, FCC 23-37, 2023 WL 3686042, at \*11, para. 37 (2023).

<sup>52</sup> 47 CFR § 64.1200(n)(2)(iii).

<sup>53</sup> *Id.* § 64.6305(g)(1), (3). This requirement also extends to accepting traffic from foreign providers using “North American Number plan resources that pertain to the United States in the caller ID field to send voice traffic.” *Id.* § 64.6305(g)(2).

<sup>54</sup> *Id.* § 64.6305(d)(4)(v).

<sup>55</sup> *Id.* § 64.6305 (d)(2)(ii), (e)(2)(ii).

<sup>56</sup> *See Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, 1904, para. 83 (2020) (*Second Caller ID Authentication Order*) (noting that if a certification “is deficient in some way,” the Commission may take enforcement action as appropriate, including “removing a defective certification from the database after providing notice to the voice service provider and an opportunity to cure the filing”); *Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, Sixth Report and Order in CG Docket No. 17-59, Fifth Report and Order in WC Docket No. 17-97, Order on Reconsideration in WC Docket No. 17-97, Order, Seventh Further Notice of Proposed Rulemaking in CG Docket No. 17-59, and Fifth Further Notice of Proposed Rulemaking in WC Docket No. 17-97, 37 FCC Rcd 6865, 6899, para. 80 (2022) (*Gateway Provider Order*) (noting that the rule applies to gateway providers as well as voice service providers); *see also Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18, 2023 WL 2582652, at \*11, para. 31 (Mar. 17, 2023) (“[A]

Veriwave provided inaccurate or outdated contact information for an individual responsible for addressing robocall mitigation-related issues.<sup>57</sup> The email address provided by Veriwave in its certification could not be contacted.<sup>58</sup> We direct Veriwave to update its RMD filing to include the correct contact information within 10 days of receipt of this letter.<sup>59</sup>

Additionally, Veriwave certified in its RMD filing, under penalty of perjury, that it will cooperate with the FCC in investigating and stopping any illegal robocallers that use its service to carry or process calls.<sup>60</sup> **Failure to respond to this letter as described above may be used as evidence that the Company's certification is deficient with respect to its commitment to cooperate, and the Bureau may initiate proceedings to remove its filing from the database.**

If Veriwave's certification is removed from the RMD for any reason, all intermediate providers and terminating voice service providers must immediately cease accepting all of the Company's calls.<sup>61</sup> If the Bureau initiates a proceeding to remove the Company's certification from the Robocall Mitigation Database, Veriwave will have an opportunity to respond.<sup>62</sup>

Please direct any inquiries regarding this letter to Caitlin Barbas, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, at [caitlin.barbas@fcc.gov](mailto:caitlin.barbas@fcc.gov) or (202) 418-2985; 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 ITG.

Sincerely,

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Loyaan A. Egal  
Chief  
Enforcement Bureau  
Federal Communications Commission

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provider's program is 'sufficient if it includes detailed practices that can reasonably be expected to significantly reduce' the carrying or processing (for intermediate providers) or origination (for voice service providers) of illegal robocalls. Each provider 'must comply with the practices' that its program requires, and its program is insufficient if the provider 'knowingly or through negligence' carries or processes calls (for intermediate providers) or originates (for voice service providers) unlawful robocall campaigns.'" (citations omitted)).

<sup>57</sup> See Veriwave Telco, LLC Listing (No. RMD0015520), Fed. Commc'ns Comm'n, Robocall Mitigation Database (filed Nov. 8, 2023), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=c74be90f1b12395051e2c808624bcbd8&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=c74be90f1b12395051e2c808624bcbd8&view=sp).

<sup>58</sup> See Automatic response to e-mail from Caitlin Barbas, Attorney Advisor, Telecommunications Consumers Division, Enforcement Bureau, to Felix Hernandez, Compliance Officer, Veriwave Telco, LLC, (Feb. 2, 2024) (on file at EB-TCD-24-00036355) (showing email could not be delivered as the host platform was not found).

<sup>59</sup> See 47 CFR § 64.6305(d)(5) (requiring a voice service provider to "update its filings within 10 business days of any change to the information it must provide pursuant to [section 64.6305(d)(1)-(4)].")

<sup>60</sup> See Veriwave Telco, LLC Listing (No. RMD0015520), Fed. Commc'ns Comm'n, Robocall Mitigation Database (filed Nov. 8, 2023), [https://fccprod.servicenowservices.com/rmd?id=rmd\\_form&table=x\\_g\\_fmc\\_rmd\\_robocall\\_mitigation\\_database&sys\\_id=c74be90f1b12395051e2c808624bcbd8&view=sp](https://fccprod.servicenowservices.com/rmd?id=rmd_form&table=x_g_fmc_rmd_robocall_mitigation_database&sys_id=c74be90f1b12395051e2c808624bcbd8&view=sp).

<sup>61</sup> 47 CFR § 64.6305(g).

<sup>62</sup> *Second Caller ID Authentication Order*, 36 FCC Rcd at 1903, para. 83; *Gateway Provider Order*, 37 FCC Rcd at 6882, para. 40.

**ATTACHMENT A**

<b>Role</b>	<b>Customer</b>	<b>Call Date &amp; Time</b>	<b>Calling No.</b>	<b>Called No.</b>	<b>Description</b>	<b>Violation</b>
ORG <sup>63</sup>	Apex Advisor Group, Inc.	Nov 30, 2023 23:24 UTC	{{ [REDACTED] }} <sup>64</sup>	{{ [REDACTED] }}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Nov 30, 2023 23:15 UTC	{{ [REDACTED] }}	{{ [REDACTED] }}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Nov 30, 2023 22:36 UTC	{{ [REDACTED] }}	{{ [REDACTED] }}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Nov 30, 2023 21:07 UTC	{{ [REDACTED] }}	{{ [REDACTED] }}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Nov 30, 2023 20:42 UTC	{{ [REDACTED] }}	{{ [REDACTED] }}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 15, 2024 21:55 UTC	{{ [REDACTED] }}	{{ [REDACTED] }}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 15, 2024 21:13 UTC	{{ [REDACTED] }}	{{ [REDACTED] }}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)

<sup>63</sup> “ORG” denotes that the Company was identified as the originator of the call.

<sup>64</sup> Material set off by double brackets {{ }} is confidential and redacted from the public version of this document.



<b>Role</b>	<b>Customer</b>	<b>Call Date &amp; Time</b>	<b>Calling No.</b>	<b>Called No.</b>	<b>Description</b>	<b>Violation</b>
ORG	Apex Advisor Group, Inc.	Jan 15, 2024 20:12 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 15, 2024 19:52 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 18, 2024 16:25 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 18, 2024 16:30 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 18, 2024 16:37 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 18, 2024 16:30 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 18, 2024 16:30 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 18, 2024 16:37 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 18, 2024 17:03 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)

<b>Role</b>	<b>Customer</b>	<b>Call Date &amp; Time</b>	<b>Calling No.</b>	<b>Called No.</b>	<b>Description</b>	<b>Violation</b>
ORG	Apex Advisor Group, Inc.	Jan 18, 2024 18:30 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 29, 2024 17:55 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 29, 2024 17:44 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 29, 2024 17:40 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 29, 2024 17:39 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 29, 2024 17:18 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)
ORG	Apex Advisor Group, Inc.	Jan 29, 2024 16:54 UTC	{{[REDACTED]}}	{{[REDACTED]}}	Tax Relief Services	47 U.S.C. § 227(b); 47 CFR § 64.1200(a)