



United States of America
FEDERAL TRADE COMMISSION
East Central Region

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Cleveland, Ohio 44114
(216) 263-3455

Jon Miller Steiger
Director

March 17, 2023

CEASE AND DESIST DEMAND

VIA EMAIL TO:
atlantaregulatory@ticket.claconnect.com

Peerless Network, Inc.
John Barnicle, CEO
433 West Van Buren Street
Suite 401S
Chicago, IL 60607
c/o Joe Solana, Registered Agent

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

- Amazon-AuthorizeOrder
- Apple-iCloud-AccountBreached
- Authorized-Order
- AutoWarranty-Extend2
- AutoWarranty-ExtendOrReinst
- CBP-GovtImpers
- CCIRR-P1FinancialImpers
- CCIRR-Various
- CCIRR-VisaAlert
- DebtRelief-COVID-19Payment
- DebtRelief-ZeroTax
- Discount-Avail50%
- FedReserv-Impers
- Financial-Impers-6
- IRS-ProcessingCenter
- Legal-Enforcement-Notice
- Medicare-Advisor
- Solar-TheSolarProject
- SSA-CalltheSSA
- SSA-Suspended

- StudentLoan - New Changes
- StudentLoan-HardshipProgram
- StudentLoan-USCenterDebtRelief
- TaxReduction-IRSSuspendedCollection
- Utility-30MinDisconnect

More specifically, our investigation revealed that Peerless Network, Inc. apparently routed and transmitted illegal robocalls, as set forth in Attachment A.

The Federal Trade Commission (FTC) works closely with USTelecom’s Industry Traceback Group (ITG), which is the registered industry consortium selected pursuant to the TRACED Act to conduct tracebacks.¹ Between January 7, 2021, and February 1, 2023, ITG investigated 79 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.² ITG conducted tracebacks and determined that Peerless Network, Inc. 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 of the illegal robocall—as indicated in Attachment A. Further, the numerous traceback notices directed to Peerless Network, Inc. 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 ENGAGING IN THEM.**

The FTC, the nation’s consumer protection agency, enforces the Federal Trade Commission Act (FTC Act), 15 U.S.C. § 45 et seq., which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC also enforces the Telemarketing Sales Rule (TSR), 16 C.F.R. Part 310, which prohibits deceptive and abusive telemarketing practices. Section 310.3(b) of the TSR prohibits “assisting and facilitating” certain specified conduct.³ Under that provision, it is unlawful for any person or entity to “provide substantial assistance or support to any seller or telemarketer when that person knows or consciously avoids knowing that the seller or telemarketer is engaged in any act or practice that violates Sections 310.3(a), (c), or (d), or Section 310.4 of this Rule.” These Sections prohibit, among others, the following conduct:

- Making a false or misleading statement to induce any person to pay for goods or services or to induce a charitable contribution (16 C.F.R. § 310.3(a)(4));
- Misrepresenting a seller or telemarketer’s affiliation with any government entity (16 C.F.R. § 310.3(a)(2)(vii));
- Transmitting false or deceptive caller ID numbers (16 C.F.R. § 310.4(a)(8));

¹ See Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274, Sec. 13(d) (2019) (TRACED Act).

² See 16 C.F.R. § 310.4(b)(1)(v).

³ A copy of the TSR is attached as Attachment B.

- Initiating or causing the initiation of calls that deliver prerecorded messages,⁴ unless the person called provided the seller express written permission to call (16 C.F.R. § 310.4(b)(1)(v)); and
- Initiating or causing the initiation of telemarketing calls to numbers listed on the National Do Not Call Registry, unless the person called provided express written permission to 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. *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).

Combating 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. *See FTC v. James B. Christiano*, 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. Educare*, the FTC alleged that defendant Globex Telecom, Inc. assisted and facilitated telemarketers it knew, or consciously avoided knowing, were violating the TSR’s prohibitions on calls delivering prerecorded messages. *See FTC v. Educare Centre Services, Inc.*, No. 3:19-cv-00196-KC (W.D. Tex. Dec. 3, 2019).⁶ In September, 2020, Globex Telecom and its associates agreed to pay \$2.1 million to settle the FTC lawsuit, and Globex Telecom’s former CEO and President was banned from telemarketing to the U.S. and was subject to a permanent court order.⁷ Similarly, in *FTC v. Alcazar Networks, Inc.*, the FTC alleged that Alcazar Networks, Inc. and its founder and sole owner assisted and facilitated telemarketers responsible for tens of millions of illegal telemarketing calls, including robocalls and spoofed calls that displayed “911” as the caller ID. *See FTC v. Alcazar Networks Inc., et al.*, No. 6:20-cv-2200 (M.D. Fla. Dec. 3, 2020).⁸ As part of their settlement with the FTC in January 2021, the defendants agreed to a permanent injunction that prohibits similar misconduct in the

⁴ These calls are often referred to as “robocalls.”

⁵ In 2022, the FTC received more than 2.7 million complaints about unwanted calls, including more than 1.61 million robocall complaints. The FTC maintains an interactive Tableau Public web page that publishes details about do not call complaints on a quarterly basis. *See* <https://public.tableau.com/profile/federal.trade.commission#!/vizhome/DoNotCallComplaints/Maps>.

⁶ A copy of the FTC’s Amended Complaint is attached as Attachment C.

⁷ *See* <https://www.ftc.gov/news-events/press-releases/2020/09/globex-telecom-associates-will-pay-21-million-settling-ftcs-first>.

⁸ A copy of the FTC’s Complaint is attached as Attachment D.

future and requires them to screen and monitor their customers, as well as imposing a monetary penalty.⁹

The FTC has business educational materials that can assist you in complying with the TSR. See <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 should also be aware that the United States Department of Justice (DOJ), state 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.¹⁰ In August 2020, a federal district court entered a permanent court order barring the defendants from conveying telephone calls into the U.S. telephone system.¹¹ State cases have had similar impacts.¹²

Within three business days, please send a message to FTC attorneys Fil Maria de Banate and Christian M. Capece, via electronic mail at fdebanate@ftc.gov and ccapece@ftc.gov, certifying that Peerless Network, Inc. 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 and Mr. Capece by email or by telephone at 216.263.3413 or 216.263.3419.

Sincerely,

JONATHAN
N STEIGER

Digitally signed by
JONATHAN STEIGER
Date: 2023.03.17
14:40:30 -04'00'

Jon Miller Steiger
Director

⁹ See <https://www.ftc.gov/news-events/press-releases/2020/12/ftc-takes-action-against-second-voip-service-provider>.

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

¹¹ See <https://www.justice.gov/opa/pr/district-court-enters-permanent-injunction-shutting-down-telecom-carriers-who-facilitated>.

¹² 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-nationwide-anti-robocall-task-force>; <https://www.michigan.gov/ag/news/press-releases/2020/08/07/ag-nessel-announces-settlement-eliminating-telecom-carrier-responsible-for-illegal-robocalls>; https://www.michigan.gov/documents/ag/Assurance_of_Voluntary_Compliance_-_All_Access_Telecom_FINAL_9-11-20_702047_7.pdf.

Enclosures:

Attachment A (Chart of illegal robocalls)

Attachment B (TSR)

Attachment C (*Educare* Amended Complaint)

Attachment D (*Alcazar* Complaint)

ATTACHMENT A

Date of ITG Notification	Date of Call	Caller ID	Robocall Campaign Identifier	Link to Robocall Recording	Potential Violation
2/1/2023	1/18/2023	7652948817	Financial-Impers-6	https://portal2.tracebacks.org/api/public/attachments/1222041	16 C.F.R. 310.4(b)(1)(v)
1/31/2023	1/31/2023	7045313350	Financial-Impers-6	https://portal2.tracebacks.org/api/public/attachments/1222036	16 C.F.R. 310.4(b)(1)(v)
1/5/2023	1/3/2023	2522248455	Medicare-Advisor	https://portal2.tracebacks.org/api/public/attachments/1195733	16 C.F.R. 310.4(b)(1)(v)
11/4/2022	11/2/2022	8582074263	Authorized-Order	https://portal2.tracebacks.org/api/public/attachments/1116690	16 C.F.R. 310.4(b)(1)(v)
10/26/2022	10/21/2022	9168469902	Authorized-Order	https://portal2.tracebacks.org/api/public/attachments/1098320	16 C.F.R. 310.4(b)(1)(v)
10/26/2022	10/20/2022	8187368831	Authorized-Order	https://portal2.tracebacks.org/api/public/attachments/1098322	16 C.F.R. 310.4(b)(1)(v)
7/8/2022	7/7/2022	9176282443	AutoWarranty-ExtendOrReinst	https://portal2.tracebacks.org/api/public/attachments/949069	16 C.F.R. 310.4(b)(1)(v)
11/23/2021	11/18/2021	7066004470	StudentLoan-HardshipProgram	https://portal2.tracebacks.org/api/public/attachments/568938	16 C.F.R. 310.4(b)(1)(v)
11/1/2021	10/28/2021	2768704323	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/544698	16 C.F.R. 310.4(b)(1)(v)
11/1/2021	10/29/2021	3616081038	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/544712	16 C.F.R. 310.4(b)(1)(v)
11/1/2021	10/29/2021	9183440660	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/544714	16 C.F.R. 310.4(b)(1)(v)
11/1/2021	10/29/2021	5703969654	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/544717	16 C.F.R. 310.4(b)(1)(v)
11/1/2021	10/29/2021	7722051139	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/544724	16 C.F.R. 310.4(b)(1)(v)
11/1/2021	10/29/2021	5413102442	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/544726	16 C.F.R. 310.4(b)(1)(v)

10/20/2021	10/19/2021	6017613447	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/527760	16 C.F.R. 310.4(b)(1)(v)
10/20/2021	10/19/2021	2603163544	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/527763	16 C.F.R. 310.4(b)(1)(v)
10/20/2021	10/19/2021	8454920549	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/527765	16 C.F.R. 310.4(b)(1)(v)
10/20/2021	10/19/2021	5189298834	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/527767	16 C.F.R. 310.4(b)(1)(v)
10/20/2021	10/19/2021	2707440791	Amazon-AuthorizeOrder	https://portal2.tracebacks.org/api/public/attachments/527865	16 C.F.R. 310.4(b)(1)(v)
10/14/2021	10/13/2021	9092311658	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/516508	16 C.F.R. 310.4(b)(1)(v)
10/14/2021	10/13/2021	6622550990	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/516512	16 C.F.R. 310.4(b)(1)(v)
9/16/2021	9/15/2021	9729525851	CBP-GovtImpers	https://portal2.tracebacks.org/api/public/attachments/453395	16 C.F.R. 310.4(b)(1)(v)
9/7/2021	9/3/2021	7865589145	Legal-Enforcement-Notice	https://portal2.tracebacks.org/api/public/attachments/431149	16 C.F.R. 310.4(b)(1)(v)
8/27/2021	8/26/2021	9285296342	CCIRR-VisaAlert	https://portal2.tracebacks.org/api/public/attachments/397023	16 C.F.R. 310.4(b)(1)(v)
8/24/2021	8/19/2021	8508861036	DebtRelief-ZeroTax	https://portal2.tracebacks.org/api/public/attachments/383765	16 C.F.R. 310.4(b)(1)(v)
8/24/2021	8/19/2021	4754719588	DebtRelief-ZeroTax	https://portal2.tracebacks.org/api/public/attachments/383768	16 C.F.R. 310.4(b)(1)(v)
8/24/2021	8/18/2021	2709713277	DebtRelief-ZeroTax	https://portal2.tracebacks.org/api/public/attachments/383771	16 C.F.R. 310.4(b)(1)(v)
8/24/2021	8/17/2021	3189033299	DebtRelief-ZeroTax	https://portal2.tracebacks.org/api/public/attachments/383774	16 C.F.R. 310.4(b)(1)(v)
8/24/2021	8/17/2021	2293588543	DebtRelief-ZeroTax	https://portal2.tracebacks.org/api/public/attachments/383777	16 C.F.R. 310.4(b)(1)(v)

8/24/2021	8/17/2021	4632323112	DebtRelief-ZeroTax	https://portal2.tracebacks.org/api/public/attachments/383781	16 C.F.R. 310.4(b)(1)(v)
8/16/2021	8/11/2021	2293588540	StudentLoan-USCenterDebtRelief	https://portal2.tracebacks.org/api/public/attachments/368913	16 C.F.R. 310.4(b)(1)(v)
8/12/2021	8/10/2021	2293609074	StudentLoan-HardshipProgram	https://portal2.tracebacks.org/api/public/attachments/360169	16 C.F.R. 310.4(b)(1)(v)
8/12/2021	8/10/2021	9705988302	StudentLoan-HardshipProgram	https://portal2.tracebacks.org/api/public/attachments/360178	16 C.F.R. 310.4(b)(1)(v)
8/12/2021	8/11/2021	2293597733	IRS-ProcessingCenter	https://portal2.tracebacks.org/api/public/attachments/360182	16 C.F.R. 310.4(b)(1)(v)
8/12/2021	8/10/2021	6063703133	IRS-ProcessingCenter	https://portal2.tracebacks.org/api/public/attachments/360186	16 C.F.R. 310.4(b)(1)(v)
8/12/2021	8/10/2021	2293597891	IRS-ProcessingCenter	https://portal2.tracebacks.org/api/public/attachments/360189	16 C.F.R. 310.4(b)(1)(v)
8/12/2021	8/10/2021	9284767934	IRS-ProcessingCenter	https://portal2.tracebacks.org/api/public/attachments/360192	16 C.F.R. 310.4(b)(1)(v)
7/29/2021	7/28/2021	5089157809	AutoWarranty-Extend2	https://portal2.tracebacks.org/api/public/attachments/307162	16 C.F.R. 310.4(b)(1)(v)
7/29/2021	7/26/2021	4069577686	StudentLoan-HardshipProgram	https://portal2.tracebacks.org/api/public/attachments/307201	16 C.F.R. 310.4(b)(1)(v)
7/22/2021	7/20/2021	7578248259	AutoWarranty-ExtendOrReinst	https://portal2.tracebacks.org/api/public/attachments/291120	16 C.F.R. 310.4(b)(1)(v)
7/21/2021	7/20/2021	7179711630	AutoWarranty-ExtendOrReinst	https://portal2.tracebacks.org/api/public/attachments/291121	16 C.F.R. 310.4(b)(1)(v)
7/19/2021	7/15/2021	6159122987	StudentLoan-HardshipProgram	https://portal2.tracebacks.org/api/public/attachments/286367	16 C.F.R. 310.4(b)(1)(v)
7/19/2021	7/15/2021	9094361864	IRS-ProcessingCenter	https://portal2.tracebacks.org/api/public/attachments/286399	16 C.F.R. 310.4(b)(1)(v)
7/19/2021	7/15/2021	9094362916	IRS-ProcessingCenter	https://portal2.tracebacks.org/api/public/attachments/286402	16 C.F.R. 310.4(b)(1)(v)

7/19/2021	7/15/2021	9094401396	IRS-ProcessingCenter	https://portal2.tracebacks.org/api/public/attachments/286408	16 C.F.R. 310.4(b)(1)(v)
7/14/2021	7/12/2021	7659348382	DebtRelief-COVID-19Payment	https://portal2.tracebacks.org/api/public/attachments/274450	16 C.F.R. 310.4(b)(1)(v)
7/14/2021	7/12/2021	6067073784	DebtRelief-COVID-19Payment	https://portal2.tracebacks.org/api/public/attachments/274452	16 C.F.R. 310.4(b)(1)(v)
7/14/2021	7/12/2021	5413766743	FedReserv-Impers	https://portal2.tracebacks.org/api/public/attachments/280171	16 C.F.R. 310.4(b)(1)(v)
7/13/2021	7/12/2021	5205323435	DebtRelief-COVID-19Payment	https://portal2.tracebacks.org/api/public/attachments/274448	16 C.F.R. 310.4(b)(1)(v)
7/13/2021	7/12/2021	8707148614	DebtRelief-COVID-19Payment	https://portal2.tracebacks.org/api/public/attachments/274453	16 C.F.R. 310.4(b)(1)(v)
7/13/2021	7/12/2021	6065174231	DebtRelief-COVID-19Payment	https://portal2.tracebacks.org/api/public/attachments/274460	16 C.F.R. 310.4(b)(1)(v)
7/13/2021	7/12/2021	7088319138	DebtRelief-COVID-19Payment	https://portal2.tracebacks.org/api/public/attachments/274461	16 C.F.R. 310.4(b)(1)(v)
6/16/2021	6/14/2021	5618102566	TaxReduction- IRSSuspendedCollection	https://portal2.tracebacks.org/api/public/attachments/211189	16 C.F.R. 310.4(b)(1)(v)
6/15/2021	6/14/2021	9705508029	TaxReduction- IRSSuspendedCollection	https://portal2.tracebacks.org/api/public/attachments/211191	16 C.F.R. 310.4(b)(1)(v)
6/15/2021	6/14/2021	7196012040	TaxReduction- IRSSuspendedCollection	https://portal2.tracebacks.org/api/public/attachments/211193	16 C.F.R. 310.4(b)(1)(v)
4/8/2021	4/7/2021	7472124080	StudentLoan - New Changes	https://portal2.tracebacks.org/api/public/attachments/94040	16 C.F.R. 310.4(b)(1)(v)
4/5/2021	4/2/2021	8708602170	StudentLoan - New Changes	https://portal2.tracebacks.org/api/public/attachments/88405	16 C.F.R. 310.4(b)(1)(v)
4/5/2021	4/2/2021	9717997951	StudentLoan - New Changes	https://portal2.tracebacks.org/api/public/attachments/88408	16 C.F.R. 310.4(b)(1)(v)
3/22/2021	3/19/2021	4054585775	SSA-Suspended	https://portal2.tracebacks.org/api/public/attachments/70649	16 C.F.R. 310.4(b)(1)(v)

3/19/2021	3/18/2021	4172355705	Apple-iCloud-AccountBreached	https://portal2.tracebacks.org/api/public/attachments/69469	16 C.F.R. 310.4(b)(1)(v)
3/9/2021	3/3/2021	7576094116	CCIRR-P1FinancialImpers	https://portal2.tracebacks.org/api/public/attachments/63709	16 C.F.R. 310.4(b)(1)(v)
3/6/2021	3/4/2021	8038286161	CCIRR-P1FinancialImpers	https://portal2.tracebacks.org/api/public/attachments/64039	16 C.F.R. 310.4(b)(1)(v)
3/5/2021	3/4/2021	8882071288	Discount-Avail50%	https://portal2.tracebacks.org/api/public/attachments/64111	16 C.F.R. 310.4(b)(1)(v)
3/3/2021	3/2/2021	9147614182	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/63417	16 C.F.R. 310.4(b)(1)(v)
3/3/2021	3/2/2021	9143443207	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/63418	16 C.F.R. 310.4(b)(1)(v)
2/26/2021	2/25/2021	7323086705	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/61836	16 C.F.R. 310.4(b)(1)(v)
2/26/2021	2/25/2021	5042858495	AutoWarranty-ExtendOrReinst	https://portal2.tracebacks.org/api/public/attachments/61845	16 C.F.R. 310.4(b)(1)(v)
2/25/2021	2/24/2021	5137692110	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/61292	16 C.F.R. 310.4(b)(1)(v)
2/25/2021	2/24/2021	5135866150	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/61293	16 C.F.R. 310.4(b)(1)(v)
2/25/2021	2/24/2021	9086845418	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/61296	16 C.F.R. 310.4(b)(1)(v)
2/24/2021	2/23/2021	8623476930	Utility-30MinDisconnect	https://portal2.tracebacks.org/api/public/attachments/60696	16 C.F.R. 310.4(b)(1)(v)
2/20/2021	2/18/2021	7038631924	Apple-iCloud-AccountBreached	https://portal2.tracebacks.org/api/public/attachments/58893	16 C.F.R. 310.4(b)(1)(v)
2/18/2021	2/17/2021	5043395475	Apple-iCloud-AccountBreached	https://portal2.tracebacks.org/api/public/attachments/58345	16 C.F.R. 310.4(b)(1)(v)
2/11/2021	2/10/2021	3036193296	SSA-CalltheSSA	https://portal2.tracebacks.org/api/public/attachments/55586	16 C.F.R. 310.4(b)(1)(v)

1/30/2021	1/27/2021	5302901397	SSA-CalltheSSA	https://portal2.tracebacks.org/api/public/attachments/29350	16 C.F.R. 310.4(b)(1)(v)
1/25/2021	1/25/2021	2033448337	AutoWarranty-ExtendOrReinst	https://portal2.tracebacks.org/api/public/attachments/28848	16 C.F.R. 310.4(b)(1)(v)
1/20/2021	1/20/2021	4088848130	CCIRR-Various	https://portal2.tracebacks.org/api/public/attachments/28549	16 C.F.R. 310.4(b)(1)(v)
1/13/2021	1/13/2021	6062123053	Solar-TheSolarProject	https://portal2.tracebacks.org/api/public/attachments/28073	16 C.F.R. 310.4(b)(1)(v)
1/7/2021	1/6/2021	3015343888	CCIRR-VisaAlert	https://portal2.tracebacks.org/api/public/attachments/27570	16 C.F.R. 310.4(b)(1)(v)