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# FCC ENFORCEMENT BUREAU CLASSIFIES 'ROYAL TIGER' AS A CONSUMER COMMUNICATIONS INFORMATION SERVICES THREAT (C-CIST)

File No. EB-TCD-24-00036019

By the Chief, Enforcement Bureau:

The Enforcement Bureau (Bureau) of the Federal Communications Commission (FCC or Commission) issues this Public Notice to notify domestic and international law enforcement partners, industry stakeholders, and consumers that it has classified a group of individuals and entities, which it identifies as "**Royal Tiger**," as a Consumer Communications Information Services Threat (C-CIST). **Royal Tiger** has a presence in India, the United Kingdom, the United Arab Emirates, and the United States.

The Bureau classifies a party as a C-CIST when the party's misconduct—in either nature or scope—poses a significant threat to consumers' trust in, and ability to use, communications information services. The Bureau applies this classification to heighten awareness of these threat actors among our law enforcement partners and industry stakeholders. The objective is to ensure that these threat actors are readily detected and blocked from perpetuating potentially unlawful schemes that compromise our communications information services and harm consumers. In particular, this notice will provide industry stakeholders with information to enhance their "Know Your Customer" (KYC) and "Know Your Upstream Provider" (KYUP) processes.¹ Industry stakeholders are the first line of defense in keeping harmful traffic off of U.S. communications networks.

### Royal Tiger's Profile and Known Associates and Entities

**Royal Tiger** is led by an individual named **Prince Jashvantlal Anand** and his associate **Kaushal Bhavsar**. **Prince Jashvantlal Anand** appears to maintain residences in the United Arab Emirates and India.<sup>2</sup> **Prince Jashvantlal Anand** has previously used the alias "Frank Murphy." **Kaushal Bhavsar** appears to maintain a residence in India<sup>4</sup> and, according to FCC records, a presence in Delaware.<sup>5</sup>

<sup>&</sup>lt;sup>1</sup> See 47 CFR § 64.1200(n)(4)-(5).

<sup>&</sup>lt;sup>2</sup> Prince Anand Skype Chat, June 17, 2021, at 3:26:34 PM (on file at EB-TCD-24-00036019) (Prince Anand Skype Chat); *id.* at November 30, 2021, at 3:53:35 AM.

<sup>&</sup>lt;sup>3</sup> Prince Anand Skype Chat at June 10, 2021, at 8:18:53 AM ("Frank Murphy" introduces himself as Prince Anand).

<sup>&</sup>lt;sup>4</sup> See Kaushal Bhavsar, Linkedln, <a href="https://in.linkedin.com/in/kaushal-bhavsar-a69a3a255">https://in.linkedin.com/in/kaushal-bhavsar-a69a3a255</a> (last visited May 10, 2024) (screenshots on file at EB-TCD-24-00036019).

<sup>&</sup>lt;sup>5</sup> See One Eye LLC, Fed. Commc'ns Comm'n, Form 499 Filer Database, Detailed Information, <a href="https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=834729">https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=834729</a> (last visited May 10, 2024).

**Royal Tiger**, through **Prince Jashvantlal Anand** and **Kaushal Bhavsar**, has operated multiple entities as originating<sup>6</sup> or gateway providers<sup>7</sup> for apparently illegal calls to consumers in the United States:

- Illum Telecommunication Limited (Illum) is an interconnected Voice over Internet Protocol (VoIP)<sup>8</sup> business incorporated in New York on November 3, 2020.<sup>9</sup> Prince Jashvantlal Anand serves as CEO and Director of Illum.<sup>10</sup> Kaushal Bhavsar also serves as a Director.<sup>11</sup>
- **PZ Telecommunication LLC** (PZ Telecom) is an interconnected VoIP<sup>12</sup> limited liability company formed in California on June 21, 2019.<sup>13</sup> **Prince Jashvantlal Anand** described the type of services offered by the company as "cloud based voip and Soft phone solution[s]." PZ Telecom maintains office locations in Anaheim, California, and Mumbai, Maharashtra, India. Prince Jashvantlal Anand is both a Member and the CEO of PZ Telecom. <sup>16</sup>

<sup>&</sup>lt;sup>6</sup> Originating providers enable their customers to initiate calls to be transmitted downstream in the call path. *See generally Vonage Holdings Corp.*, 19 FCC Rcd 22404, 22407-08, at paras. 8-9 (2004) (describing call origination).

<sup>&</sup>lt;sup>7</sup> "The term 'gateway' provider means 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." 47 CFR § 64.1200(f)(19).

<sup>&</sup>lt;sup>8</sup> See Illum Telecommunication Ltd, Fed. Commc'ns Comm'n, Form 499 Filer Database, Detailed Information, <a href="https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=834457">https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=834457</a> (last visited May 10, 2024).

<sup>&</sup>lt;sup>9</sup> See Illum Telecommunication Ltd, Entity Information, New York State Dep't of State, Div. of Corps., <a href="https://apps.dos.ny.gov/publicInquiry/EntityDisplay">https://apps.dos.ny.gov/publicInquiry/EntityDisplay</a> (last visited May 10, 2024) (screenshots on file at EB-TCD-24-00036019).

<sup>&</sup>lt;sup>10</sup> See Illum Telecommunication Ltd, Fed. Comme'ns Comm'n, Form 499 Filer Database, Detailed Information, <a href="https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=834457">https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=834457</a> (last visited May 10, 2024) (listing Anand as CEO); see also Illum Telecommunication, <a href="https://www.illumtelecommunication.com/">https://www.illumtelecommunication.com/</a> (last visited July 14, 2023) (screenshots on file at EB-TCD-24-00036019) (listing Anand as Director).

<sup>&</sup>lt;sup>11</sup> Illum Telecommunication, <a href="https://www.illumtelecommunication.com/">https://www.illumtelecommunication.com/</a> (last visited July 14, 2023) (screenshots on file at EB-TCD-24-00036019) (listing Bhavsar as Director).

<sup>&</sup>lt;sup>12</sup> See PZ Telecommunication LLC, Fed. Commc'ns Comm'n, Form 499 Filer Database, Detailed Information, https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=833823 (last visited May 10, 2024).

<sup>&</sup>lt;sup>13</sup> See PZ Telecommunication LLC, LLC Registration – Articles of Organization, California Sec'y of State, (June 19, 2019), https://bizfileonline.sos.ca.gov/search/business.

<sup>&</sup>lt;sup>14</sup> PZ Telecommunication LLC, Sec'y of State Statement of Information (Limited Liability Company), California Sec'y of State (May 6, 2021), <a href="https://bizfileonline.sos.ca.gov/search/business">https://bizfileonline.sos.ca.gov/search/business</a>.

<sup>15</sup> See id.

<sup>&</sup>lt;sup>16</sup> See id. (listing Prince Anand as a Member); see also PZ Telecommunication LLC, Sec'y of State Statement of Information (Limited Liability Company), California Sec'y of State (June 26, 2019), <a href="https://bizfileonline.sos.ca.gov/search/business">https://bizfileonline.sos.ca.gov/search/business</a> (listing Prince Anand as CEO).

• One Eye LLC (One Eye) is an interconnected VoIP<sup>17</sup> limited liability company registered in Delaware on September 2, 2021.<sup>18</sup> Kaushal Bhavsar serves as the named CEO of One Eye.<sup>19</sup>

Royal Tiger is also associated with multiple companies in the United Kingdom and India:

- Illum Telecommunication Private Limited (Illum India) was registered in Ahmedabad, Gujarat, India, on January 11, 2018.<sup>20</sup> Prince Jashvantlal Anand and Kaushal Bhavsar serve as Directors of the company.<sup>21</sup>
- **PZ Telecommunications (UK) LTD** (PZ UK) was a British company incorporated in England and Wales, United Kingdom, on May 12, 2020.<sup>22</sup> PZ UK dissolved on October 19, 2021.<sup>23</sup> **Prince Jashvantlal Anand** served as Director and Secretary."<sup>24</sup>
- **UK Tell Ltd.** (UK Tell) is a British company registered in England and Wales, United Kingdom, on October 25, 2019.<sup>25</sup> In 2022 and early 2023, UK Tell acted as a Foreign Point of Departure for apparently illegal calls that One Eye received and transmitted through U.S. networks.<sup>26</sup> **Prince Jashvantlal Anand** served as a Director of UK Tell from May 24, 2023,<sup>27</sup> to December 27, 2023.<sup>28</sup>

<sup>&</sup>lt;sup>17</sup> See One Eye LLC, Fed. Commc'ns Comm'n, Form 499 Filer Database, Detailed Information, https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=834729 (last visited May 10, 2024).

<sup>&</sup>lt;sup>18</sup> See One Eye LLC Entity Details, Delaware Dep't of State, <a href="https://icis.corp.delaware.gov/Ecorp/EntitySearch/NameSearch.aspx">https://icis.corp.delaware.gov/Ecorp/EntitySearch/NameSearch.aspx</a> (last visited May 10, 2024) (screenshots on file at EB-TCD-24-00036019).

<sup>&</sup>lt;sup>19</sup> See One Eye LLC, Fed. Commc'ns Comm'n, Form 499 Filer Database, Detailed Information, https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=834729 (last visited May 10, 2024).

<sup>&</sup>lt;sup>20</sup> Business Report for Illum Telecommunication Private Limited, Thompson Reuters CLEAR (Mar. 7, 2024) (on file at EB-TCD-24-00036019).

<sup>&</sup>lt;sup>21</sup> *Id*.

<sup>&</sup>lt;sup>22</sup> See PZ Telecommunications (UK) Ltd, Certificate of Incorporation of a Private Limited Company, Registrar of Companies for England and Wales (May 12, 2020), <a href="https://find-and-update.company-information.service.gov.uk/company/12596899">https://find-and-update.company-information.service.gov.uk/company/12596899</a>.

<sup>&</sup>lt;sup>23</sup> See PZ Telecommunications (UK) Ltd, Final Gazette Notice, Registrar of Companies for England and Wales (Oct. 19, 2021), https://find-and-update.company-information.service.gov.uk/company/12596899.

<sup>&</sup>lt;sup>24</sup> See PZ Telecommunications (UK) Ltd, Certificate of Incorporation of a Private Limited Company, Registrar of Companies for England and Wales (May 12, 2020), <a href="https://find-and-update.company-information.service.gov.uk/company/12596899/officers">https://find-and-update.company-information.service.gov.uk/company/12596899/officers</a>.

<sup>&</sup>lt;sup>25</sup> See UK Tell Ltd, Certificate of Incorporation of a Private Limited Company, Registrar of Companies for England and Wales (Oct. 25, 2019), <a href="https://find-and-update.company-information.service.gov.uk/company/12281641">https://find-and-update.company-information.service.gov.uk/company/12281641</a>.

<sup>&</sup>lt;sup>26</sup> See Industry Traceback Group (ITG) Subpoena Response (Mar. 4, 2022) (on file at EB-TCD-24-00036019).

<sup>&</sup>lt;sup>27</sup> See UK Tell Ltd, Appointment of Director, Registrar of Companies for England and Wales (May 24, 2023), <a href="https://find-and-update.company-information.service.gov.uk/company/12281641">https://find-and-update.company-information.service.gov.uk/company/12281641</a>; UK Tell Ltd, Termination of a Director Appointment, Registrar of Companies for England and Wales (Dec. 27, 2023), <a href="https://find-and-update.company-information.service.gov.uk/company/12281641">https://find-and-update.company-information.service.gov.uk/company/12281641</a>.

<sup>&</sup>lt;sup>28</sup> See UK Tell Ltd, Termination of a Director Appointment, Registrar of Companies for England and Wales (Dec. 27, 2023) <a href="https://find-and-update.company-information.service.gov.uk/company/12281641">https://find-and-update.company-information.service.gov.uk/company/12281641</a>.

- Opulix Digital Limited (Opulix UK) is a British company incorporated in England and Wales,
  United Kingdom, on January 24, 2024.<sup>29</sup> Prince Jashvantlal Anand is listed as Director and
  Secretary on UK corporate filings.<sup>30</sup> Opulix UK purportedly offers business and domestic
  software development, web portals, advertising services, and information technology consultancy
  activities.<sup>31</sup>
- Opulix Digital Private Limited (Opulix India) is an Indian company registered in Ahmedabad, Gujarat, India, on April 9, 2023.<sup>32</sup> Prince Jashvantlal Anand and Kaushal Bhavsar serve as Directors.<sup>33</sup>

#### **Royal Tiger Risk Assessment**

**Royal Tiger** has facilitated imposter scams, including calls that spoofed<sup>34</sup> phone numbers for financial institutions such as banks. Impersonation calls are particularly nefarious because they can result in substantial financial loss and erode public trust in the telecommunications network. In addition to the FCC, multiple federal and state agencies have joined forces to "crackdown on telemarketing operations responsible for billions of illegal calls to U.S. consumers," including such calls emerging from abroad.<sup>35</sup> As the respective Attorneys General for Michigan and Ohio have noted, scammers "swarm through the international telecommunications landscape where they strike in overwhelming numbers, working to scam and defraud thousands of Americans every day."<sup>36</sup> In 2023, the Federal Trade Commission (FTC) received reports of 853,935 imposter scams and reported losses totaling nearly \$2.7 billion.<sup>37</sup> Imposter scams also represent the highest form of fraud-related complaints submitted by military personnel with total reported losses of \$178 million.<sup>38</sup>

<sup>&</sup>lt;sup>29</sup> See Opulix Digital Limited, Certificate of Incorporation of a Private Limited Company, Registrar of Companies for England and Wales (Jan. 24, 2024), <a href="https://find-and-update.company-information.service.gov.uk/company/15438817/filing-history">https://find-and-update.company-information.service.gov.uk/company/15438817/filing-history</a>.

<sup>&</sup>lt;sup>30</sup> See id.

<sup>&</sup>lt;sup>31</sup> See Opulix Digital Limited, Overview, Registrar of Companies for England and Wales, <a href="https://find-and-update.company-information.service.gov.uk/company/15438817">https://find-and-update.company-information.service.gov.uk/company/15438817</a> (last visited May 10, 2024) (screenshots on file at EB-TCD-24-00036019).

<sup>&</sup>lt;sup>32</sup> Company Profile for Opulix Digital Private Limited, LexisNexis, Nexis Dossier, (Mar. 7, 2024) (on file at EB-TCD-24-00036019).

 $<sup>^{33}</sup>$  Id

<sup>&</sup>lt;sup>34</sup> "Spoofing is when a caller deliberately falsifies the information transmitted to your caller ID display to disguise their identity." *Caller ID Spoofing*, Fed. Commc'n Comm'n, <a href="https://www.fcc.gov/spoofing">https://www.fcc.gov/spoofing</a> (last updated Mar. 7, 2022). It is unlawful to spoof phone numbers "with the intent to defraud, cause harm, or wrongfully obtain anything of value." 47 U.S.C. § 227(e)(1); 47 CFR § 64.1604(a); *but see* 47 U.S.C. § 227(e)(3)(B)(ii) (exempting activities undertaken by U.S. law enforcement or pursuant to a court order); 47 CFR § 64.1604(b) (same).

<sup>&</sup>lt;sup>35</sup> See U.S. Dep't of Justice, Annual Report to Congress on Department of Justice Activities to Combat Elder Fraud and Abuse, at 11 (Oct. 18, 2023), <a href="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice.gov/elderjustice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justice/media/1319976/dl?inline="https://www.justi

<sup>&</sup>lt;sup>36</sup> See Dana Nessel & Dave Yost, *The Relentless Battle to Eliminate Robocalls*, Nat'l Ass'n of Attorneys Gen. (Oct. 4, 2021), <a href="https://www.naag.org/attorney-general-journal/the-relentless-battle-to-eliminate-robocalls/">https://www.naag.org/attorney-general-journal/the-relentless-battle-to-eliminate-robocalls/</a>.

<sup>&</sup>lt;sup>37</sup> See Fed. Trade Comm'n, Consumer Sentinel Network Data Book 2023, at 4 (Feb. 2024), https://www.ftc.gov/system/files/ftc\_gov/pdf/CSN-Annual-Data-Book-2023.pdf.

<sup>&</sup>lt;sup>38</sup> *Id.* at 18.

Imposter scams also pose a significant threat to older people, who are often defrauded into sending payments or disclosing personally identifiable information.<sup>39</sup> The U.S. Treasury Department's Financial Crimes Enforcement Network recently issued an advisory alerting financial institutions about scams targeting older adults.<sup>40</sup> In particular, the advisory focused on imposter tactics, in which "scammers commonly impersonate government officials, law enforcement agencies, technical and customer support representatives, social media connections, or family, friends, and other trusted persons."<sup>41</sup> These scams can have a substantial impact on the financial and emotional well-being of individuals. The FTC reported that in 2022, older adults disclosed "tremendous losses" to government impersonation scams in the amount of \$186 million.<sup>42</sup>

### Royal Tiger's Notable Apparently Illegal Conduct

In October 2021, the Bureau demanded that PZ Telecom and Illum cease originating apparently illegal robocall traffic.<sup>43</sup> During the Bureau's investigation of PZ Telecom and Illum, **Prince Jashvantlal Anand** created One Eye,<sup>44</sup> but kept his name off corporate documents,<sup>45</sup> apparently to deflect scrutiny.<sup>46</sup> **Kaushal Bhavsar**, a director at Illum,<sup>47</sup> became One Eye's CEO.<sup>48</sup> One Eye also began serving as a gateway provider for apparently illegal robocalls,<sup>49</sup> which the Bureau quickly determined before subsequently ordering downstream providers to block One Eye's traffic.<sup>50</sup>

<sup>&</sup>lt;sup>39</sup> U.S. Dep't of Treasury Fin. Crimes Enf't Network, Advisory on Elder Financial Exploitation, at 5 (June 15, 2022), <a href="https://www.fincen.gov/sites/default/files/advisory/2022-06-15/FinCEN%20Advisory%20Elder%20Financial%20Exploitation%20FINAL%20508.pdf">https://www.fincen.gov/sites/default/files/advisory/2022-06-15/FinCEN%20Advisory%20Elder%20Financial%20Exploitation%20FINAL%20508.pdf</a>.

<sup>&</sup>lt;sup>40</sup> *Id*.

<sup>&</sup>lt;sup>41</sup> *Id*.

<sup>&</sup>lt;sup>42</sup> See Fed. Trade Comm'n, Protecting Older Consumers 2022-2023, at 19-20 (Oct. 18, 2023), https://www.ftc.gov/system/files/ftc\_gov/pdf/p144400olderadultsreportoct2023.pdf.

<sup>&</sup>lt;sup>43</sup> Letter from Rosemary C. Harold, Chief, Enforcement Bureau, to Prince Anand, CEO, PZ/Illum Telecommunication, 2021 WL 4953715, at \*1 (Oct. 21, 2021) <a href="https://docs.fcc.gov/public/attachments/DOC-376749A1.pdf">https://docs.fcc.gov/public/attachments/DOC-376749A1.pdf</a> (PZ Illum Letter).

<sup>&</sup>lt;sup>44</sup> Prince Anand Skype Chat, *supra* note 2, at October 24, 2021, at 9:01:49 AM; 9:02:21 AM (Spiller: "Who is the owner [of One Eye]?"; Anand: "me only sir."); *see also* One Eye LLC, Fed. Commc'ns Comm'n, Form 499 Filer Database, Detailed Information, <a href="https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=834729">https://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=834729</a> (last visited May 10, 2024).

<sup>&</sup>lt;sup>45</sup> Prince Anand Skype Chat, *supra* note 2, at October 24, 2021, at 8:16:14-21 AM (Anand: "you will get a new sign up; from one eye llc"); *id.* at October 24, 2021, at 9:02:21 AM (Anand: "I will work from the backend").

<sup>&</sup>lt;sup>46</sup> *Id.* at October 24, 2021, at 7:40:25 AM; 8:11:13 AM (Spiller: "Did you take care of [the cease and desist letter] . . ."; Anand: yes sir thats [sic] why I am shutting down the companies"); *id.* at October 24, 2021, at 8:14:48-55 AM (Anand: "i will not be included in any companies, i will work from the backend."); *id.* at October 24, 2021, at 9:04:12 AM (Anand: "Also i am planning to get the circuits to a colocations so they cant [sic] close us down sir.").

<sup>&</sup>lt;sup>47</sup> Illum Telecommunication, <a href="https://www.illumtelecommunication.com/">https://www.illumtelecommunication.com/</a> (last visited July 14, 2023) (screenshots on file at EB-TCD-24-00036019).

<sup>&</sup>lt;sup>48</sup> See One Eye LLC Listing (No. RMD0009215), Fed. Commc'ns Comm'n, Robocall Mitigation Database (Oct. 26, 2021),

https://fccprod.servicenowservices.com/rmd?id=rmd\_form&table=x\_g\_fmc\_rmd\_robocall\_mitigation\_database&sy\_s\_id=9e1373b31b53b0107ccf20ecac4bcb3b&view=sp\_(listing Bhavsar as CEO).

<sup>&</sup>lt;sup>49</sup> See Letter from Loyaan A. Egal, Chief, Enforcement Bureau, to Kaushal Bhavsar, CEO, One Eye LLC, 2023 WL 2070119, at \*1 (Feb. 15, 2023), <a href="https://docs.fcc.gov/public/attachments/DOC-391103A1.pdf">https://docs.fcc.gov/public/attachments/DOC-391103A1.pdf</a> (One Eye Letter).

<sup>&</sup>lt;sup>50</sup> One Eye LLC, Final Determination Order, DA 23-389, 2023 WL 3530737, at \*1, para. 1 (EB May 11, 2023).

Many of the calls facilitated by **Royal Tiger** were placed by parties impersonating government agencies, banks, and utility companies.<sup>51</sup> Other calls pertained to purported credit card interest rate reduction offers and purchase authorizations for orders purportedly placed by the party receiving the call.<sup>52</sup>

Samples of the scam messages are provided below:53

# This call is from the Department of Social Security Administration.

The reason you have received this phone call from our department is to inform you that we just suspend [sic] your social security number because we found some suspicious activity.

So if you want to know about this case just press 1 thank

This is an important call regarding illegal enforcement action being executed under your name for suspicious and fraudulent activities carried out using your identity.

The court has issued a suspension notice along with a warrant against your name. Ignoring this message will be an intentional second attempt to avoid initial appearance before a magistrate, judge, or grand jury for a federal criminal offense.

This is the final attempt to reach you. For more information, press 1 and hold for the next available officer

Attention, this call is from Federal Reserve system to notify you that we have found some suspicious activities in your financial transaction. So to find out more information kindly press 1. I repeat press 1 to get more information.

This call is to inform you about a package [sic] has been seized under your name by US Customs and Border Protection with contraband of drugs and cash. So the moment you receive this message, please press 1 to talk to our investigation officer to avoid legal consequences.

This message is intended to contact you regarding illegal enforcement action executed under your social security number for suspicious and fraudulent activities committed in the state of Texas.

And we just suspended your social security number. Ignoring this will be an intentional second attempt to avoid initial appearance before magistrate, judge, or grand jury for a federal criminal offense.

This is the final attempt to reach you so if you want to know about this case, just press 1.

**Royal Tiger** routed calls from its U.S.-based entities to Great Choice Telecom LLC (Great Choice),<sup>54</sup> a Texas entity controlled by John Spiller, who was the subject of an FCC forfeiture order in the amount of

<sup>&</sup>lt;sup>51</sup> See ITG Subpoena Response (Nov. 29, 2022) (on file at EB-TCD-24-00036019); ITG Subpoena Response (Oct. 19, 2021) (on file at EB-TCD-24-00036019); see also PZ Illum Letter, supra note 43, at \*3-7; One Eye Letter, 2023 WL 2070119, at \*4, Attachment A.

<sup>&</sup>lt;sup>52</sup> See ITG Subpoena Response (Nov. 29, 2022) (on file at EB-TCD-24-00036019); ITG Subpoena Response (Oct. 19, 2021) (on file at EB-TCD-24-00036019); see also PZ Illum Letter, supra note 43, at \*3-7, Attachment A; One Eye Letter, 2023 WL 2070119, at \*4, Attachment A.

<sup>&</sup>lt;sup>53</sup> See ITG Subpoena Response (Oct. 19, 2021) (on file at EB-TCD-24-00036019) (emphasis added); see also ITG Subpoena Response (Nov. 29, 2022) (on file at EB-TCD-24-00036019) (emphasis added). Audio recordings on file at on file at EB-TCD-24-00036019.

<sup>&</sup>lt;sup>54</sup> See ITG Subpoena Response (Oct. 19, 2021) (on file at EB-TCD-24-00036019).

\$225,000,000 for placing illegal spoofed robocalls.<sup>55</sup> John Spiller is known to have used the alias "Mikel Quinn."<sup>56</sup> More than being just a business associate, John Spiller often advised **Prince Jashvantlal Anand** on how to navigate the U.S. telecommunications industry, including by providing professional contacts and solving technical problems.<sup>57</sup> Great Choice has also been the target of cease-and-desist letters from both the Bureau and the FTC for transmitting apparently illegal robocalls.<sup>58</sup>

## **Prior Enforcement Actions Against Royal Tiger**

The Bureau has repeatedly moved to enforce its rules against Royal Tiger. On October 21, 2021, the Bureau sent a letter to PZ Telecom and Illum demanding they take steps to cease originating apparently illegal traffic.<sup>59</sup> On February 14, 2023, the Bureau sent a letter to One Eye demanding it take steps to cease serving as a gateway provider for apparently illegal traffic.<sup>60</sup> On April 3, 2023, the Bureau followed that letter with an Initial Determination Order,<sup>61</sup> and on May 11, 2023, issued a Final Determination Order requiring downstream providers to block One Eye's traffic.<sup>62</sup>

One Eye has also been the subject of investigations by FTC and multiple state attorneys general. On August 23, 2022, the FTC sent a letter to One Eye demanding it cease routing and transmitting apparently illegal robocall traffic.<sup>63</sup> On August 1, 2022, the Office of the Indiana Attorney General, in collaboration

<sup>&</sup>lt;sup>55</sup> See 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, Forfeiture Order, 36 FCC Rcd 6225 (2021).

<sup>&</sup>lt;sup>56</sup> John Spiller Skype Chat, June 19, 2020, at 9:47:01 AM (on file at EB-TCD-24-00036019) (Spiller: "I am going to be the new CEO of a new telecom company so I can continue to run my traffic if the FCC shuts off my business the new company is called Great Choice Telecom LLC and the new owner is Mikel Quinn."); *id.* at Sept. 30, 2020, at 11:25:16 AM (Spiller: "[The credit reference I am requesting] is going to be for great choice telecom, LLC and under my allias [sic] Quinn will that still be ok? Mikel.").

<sup>&</sup>lt;sup>57</sup> See, e.g., Prince Anand Skype Chat, *supra* note 2, at June 10, 2021, at 6:03:55 PM (Anand: "Do you know any developer?"; Spiller: I do . . . he is the most amazing developer I know of . . . "; Anand: "ok."); *id.* at June 22, 2021, at 12:41:23 AM (Spiller: "I trust you and respect you fully and I have my Vicidial guy ready to help you when your [sic] ready let me know. And talk to me before you turn your US CC traffic off. I have ways of getting around a lot of things more than we have ever talked about. So let me have the first swing at your issues and allow me an opportunity to fix it before you give up.").

<sup>&</sup>lt;sup>58</sup> See Letter from Loyaan A. Egal, Chief, Enforcement Bureau, to Mikel Quinn, CEO, Great Choice Telecom LLC, 2022 WL 445150 (Feb. 10, 2022), <a href="https://docs.fcc.gov/public/attachments/DOC-380158A1.pdf">https://docs.fcc.gov/public/attachments/DOC-380158A1.pdf</a>; see also Letter from Jon Miller Steiger, Director, Federal Trade Commission, to Great Choice Telecom LLC (Aug. 23, 2022), <a href="https://www.ftc.gov/system/files/ftc\_gov/pdf/pointofnoentry-greatchoicecdletter\_0.pdf">https://www.ftc.gov/system/files/ftc\_gov/pdf/pointofnoentry-greatchoicecdletter\_0.pdf</a>.

<sup>&</sup>lt;sup>59</sup> PZ Illum Letter, *supra* note 43.

<sup>&</sup>lt;sup>60</sup> One Eye Letter, *supra* note 49, at \*1.

<sup>61</sup> One Eye LLC, Initial Determination Order, DA-23-279, 2023 WL 2806073 (EB Apr. 3, 2023).

<sup>&</sup>lt;sup>62</sup> One Eye LLC, Final Determination Order, DA 23-389, 2023 WL 3530737, at \*1 (EB May 11, 2023). One Eye never responded to the cease-and-desist letter or the Initial Determination Order, despite the potential blocking consequences, and failed to provide any evidence demonstrating that the traffic identified by the Bureau was otherwise legal. *See id.* at \*1-2. The Bureau, thus, issued the Final Determination Order based on One Eye's failure to adequately respond to the Bureau's Notification of Suspected Illegal Traffic and Initial Determination Order. *Id.* at \*2.

<sup>&</sup>lt;sup>63</sup> See Letter from Jon Miller Steiger, Director, Federal Trade Commission, to One Eye LLC (Aug. 23, 2022), <a href="https://www.ftc.gov/system/files/ftc\_gov/pdf/pointofnoentry-oneeyecdletter.pdf">https://www.ftc.gov/system/files/ftc\_gov/pdf/pointofnoentry-oneeyecdletter.pdf</a>.

with the Anti-Robocall Multistate Litigation Task Force, 64 issued a Civil Investigative Demand (CID) to One Eye in connection with its investigation into One Eye's potentially illegal robocalling practices. 65 After One Eye failed to respond to the CID and to a subsequent warning letter, the Office of the Indiana Attorney General filed a petition in the Marion County Superior Court to enforce the CID.66 The court granted the petition and ultimately enjoined One Eye from routing or transmitting calls to Indiana residents, to phone numbers with an Indiana area code, to phone numbers on the Indiana Do Not Call List, and to phone numbers on the Federal Do Not Call Registry. 67

#### Advisory

The Bureau classifies Royal Tiger as a C-CIST because it poses a significant threat to consumers' trust in and ability to use communications information services. The Bureau applies this classification to heighten awareness among our enforcement partners and industry stakeholders. The objective is to ensure that the designated parties are readily detected and blocked from perpetuating potentially unlawful schemes that compromise our communications information services and harm consumers.

Law enforcement, industry stakeholders, and consumers should regard Royal Tiger as a potential threat to communications information services. If you suspect individuals or entities associated with Royal **Tiger** of violating the Communications Act of 1934, as amended, or the Commission's rules, please inform the FCC by sending an email to CCIST@fcc.gov.

> ENFORCEMENT BUREAU Loyaan A. Egal Chief

<sup>&</sup>lt;sup>64</sup> See Attorney General Todd Rokia Announces the Formation of a Nationwide Bipartisan Anti-Robocall Litigation Task Force, Off. of the Ind. Att'y Gen. (Aug. 2, 2022),

https://events.in.gov/event/attorney\_general\_todd\_rokita\_announces\_the\_formation\_of\_a\_nationwide\_bipartisan\_an ti-robocall litigation task force; see also National Anti-Robocall Litigation Task Force, Led by Indiana, Seeks Answers, Off. of the Ind. Att'v Gen. (Nov. 1, 2022).

https://events.in.gov/event/attorney general todd rokita files enforcement actions against two alleged illegal ro bocallers.

<sup>&</sup>lt;sup>65</sup> See Verified Petition to Enforce Civil Investigative Demand at 12, Rokita v. One Eye LLC, No. 49D03-2211-MI-037723 (Ind. St., Marion County, Super. Ct., Nov. 1, 2022).

<sup>&</sup>lt;sup>66</sup> *Id*.

<sup>&</sup>lt;sup>67</sup> See Order on Petition to Enforce Civil Investigative Demand, Rokita v. One Eye LLC, No. 49D03-2211-MI-037723 (Ind. St., Marion County, Super. Ct., Feb. 9, 2023); Order on Petitioner's Motion for Sanctions for Failure to Comply with Demand, at 1-2, Rokita v. One Eye LLC, No. 49D03-2211-MI-037723 (Ind. St., Marion County, Super. Ct., May 31, 2023).