

STATE OF MICHIGAN
IN THE 30TH JUDICIAL CIRCUIT COURT FOR THE COUNTY OF INGHAM

DANA NESSEL, ATTORNEY GENERAL
OF THE STATE OF MICHIGAN, *ex rel*
The People of the State of Michigan,

Petitioner,

No. 22- -CZ

v

HON.

UNKNOWN CALLERS; THINQ
TECHNOLOGIES, INC.; OTHER,
UNKNOWN VOIP/VOICE SERVICE
PROVIDERS,

Respondents.

Meghan E. Schaar (P78736)
Assistant Attorney General
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**ATTORNEY GENERAL'S *EX PARTE* PETITION FOR CIVIL
INVESTIGATIVE SUBPOENAS**

I. Introduction

Robocall and spoofing law enforcement investigations and actions present a challenge; identifying the bad actor making the calls. Most robocallers use spoofed caller ID numbers. By their very nature, spoofed calls disguise the caller's identity and are difficult to trace; including by use of fictitious names and interchangeable corporate entities. When, as is frequently the case, the calls originate from callers

outside the U.S., enforcement actions against U.S. internet VoIP and voice service providers causing the calls to be made to U.S. residents is necessary and appropriate if the illegal calls are to be stopped from reaching Michigan residents. The entities using the internet to advance these calls into, and throughout, the United States are often easier to identify than the call originators. And their role is such that they are propagating illegal solicitations by causing such calls to be made to Michigan residents. The purpose of this Petition is to obtain subpoenas allowing the Attorney General to learn as much as possible about calls from a scammer pretending to offer AT&T DirecTV services, and the entities or other responsible parties causing such solicitations to be made to Michigan residents through illegal robocalls from spoofed numbers.

II. Parties, Legal Authority, and Venue

1. The Michigan Department of Attorney General (“Attorney General”) is authorized to file an *ex parte* petition with the Circuit Court requesting issuance of investigative subpoenas pursuant to Section 7 of the Michigan Consumer Protection Act (“MCPA”). That statute provides in pertinent part:

Upon the *ex parte* application of the attorney general to the circuit court in the county where the defendant is established or conducts business or, if the defendant is not established in this state, in Ingham county, the circuit court, if it finds probable cause to believe a person has engaged, is engaging, or is about to engage in a method, act, or practice which is unlawful under this act, may, after *ex parte* hearing, issue a subpoena compelling a person to appear before the attorney general and answer under oath questions relating to an alleged violation of this act The subpoena may compel a person to produce the books, records, papers, documents, or things relating to a violation of this act. . . . [MCL 445.907(1).]

2. The true identity of the Respondent caller(s) making unsolicited prerecorded telephone calls ('robocalls') to Michigan residents in this matter are unknown. These callers have purported to be from AT&T DirecTV offering persons called a 50% discount on the purchase of DirecTV subscription services.

3. The calls are not from AT&T DirecTV, and are actually part of a scam aimed at ripping off Michigan consumers. AT&T confirmed that these calls are a scam and the company is not behind these offers. (See <https://abc11.com/scam-call-att-directv-im-calling-you-from/11079862/>)

4. Respondent THINQ TECHNOLOGIES, INC. ("thinQ") is a Voice over Internet Protocol ("VoIP") service provider headquartered in Raleigh, North Carolina. (See <https://www.thinq.com>)

5. VoIP services convert your voice into a digital signal that travels over the Internet. VoIP service providers route outgoing and incoming calls, converting the digital signal to a regular telephone signal before it reaches the destination. These services are a cheap way for robocallers to make millions of scam calls from anywhere in the world, in a matter of minutes. (See

<https://www.fcc.gov/general/voice-over-internet-protocol-voip> and Attorney General's *Anatomy of a Robocall- Part 1, Attachment A*)

6. The identities of other Respondent VoIP/voice service providers or other responsible parties (hereafter, "Unknown VoIP Providers") causing illegal robocalls to be made in violation of Michigan Law are unknown.

7. The purposes of this investigation are to ascertain the Unknown Caller Respondent's true identity and location; the identities of Unknown VoIP Provider Respondents causing the illegal robocalls to be made; and to obtain documents and records relevant to Respondent thinQ's business practices in relation to the fake "AT&T DirecTV" calls. This Petition has been captioned in the manner anticipated by MCR 2.106(C) and MCR 2.201(D) as to the Unknown Respondents.

8. As detailed below, the person/s purporting to be AT&T DirecTV targeted residents throughout the state of Michigan in a scam that violates the Michigan Home Solicitation Sales Act (MHSSA) and the MCPA. MCL 445.111 and MCL 445.903(1)(gg). This makes this Court an appropriate venue for this Petition. MCL 445.907(1)

III. Factual Background

9. The Industry Traceback Group (ITG), led by USTelecom and designated by the Federal Communications Commission as the official U.S. Traceback Consortium, is a group that facilitates a neutral coordination platform for voice service providers to trace and identify the source of illegal robocalls, in order to provide for the robust protection of voice networks and users of such

services from fraudulent, abusive and/or unlawful robocalls. (See USTelecom Initiatives, Industry Traceback Group Overview, **Attachment B**) The ITG works with federal and state law enforcement agencies to identify the parties responsible for illegal robocalls and to stop such traffic. (See <https://tracebacks.org/about/>)

10. The tracing process (“traceback”) involves tracing a suspected illegal call to its ultimate source by working backwards from the call recipient’s voice service provider through the chain of multiple provider networks transferring/carrying the call until the originating provider and/or calling party is identified.

11. On October 21, 2021, the Attorney General’s Corporate Oversight Division received information from the UST that during the period of February 12, 2021 until October 6, 2021 calls falsely claiming to be from AT&T DirecTV offering a 50% discount in an attempt to extort money terminated in the state of Michigan. (ITG USTelecom Robocall Campaign Report Traceback Results Summary dated October 20, 2021, **Attachment C**)

12. On November 19, 2021, UST provided additional information evidencing that further AT&T DirecTV campaign robocalls were terminating in the state of Michigan during the period of November 3, 2021 through November 17, 2021. (ITG USTelecom Robocall Campaign Report Traceback Results Summary email dated November 19, 2021, **Attachment D**)

13. ThinQ is a cloud-based communications company that delivers voice and SMS services to customers. (See <https://www.thinq.com>)

14. The ITG traceback results indicate that thinQ was an originating service provider that first brought the above calls onto the United States telephone network on behalf of the caller during the period of February 12, 2021 until October 6, 2021 and during the period of November 3, 2021 until November 17, 2021. (See Attachments C and D)

15. Although additional information may exist regarding these and other relevant ITG tracebacks, the Attorney General needs subpoenas in order to obtain it. Such information may include call data records/numbers used in the calls, any information relating to the identity and location of the Unknown Caller, (who may be from outside the U.S.), the identity of Unknown VoIP Providers and other relevant information.

16. YouMail, Inc. provides a call answering service to over 11 million registered users in the United States. Consumers can opt into the YouMail service by changing the conditional call forward setting provided by their mobile phone carrier (i.e. Verizon, AT&T, T-Mobile and others) which enables YouMail to answer any calls those consumers do not answer. As an information service acting as an agent on behalf of these consumers, YouMail will capture the voicemail audio from callers and transcribe that audio into text that can be read. (See Affidavit of Michael Rudolph, **Attachment E**)

17. YouMail operates the YouMail Sensor Network, which takes these answered calls at scale across all carriers and pairs them up with machine learning (ML) and artificial intelligence (AI) technologies to provide a method of determining

and measuring calls to the U.S. Public Telephone Network based on the audio content of those calls regardless of their originating numbers. As such, any particular voice calling campaign can be isolated and investigated regardless of the origination numbers or service providers of that calling campaign. (*Id.*)

18. On November 29, 2021, Michael Rudolph, Chief Technology Officer for YouMail, provided information to the Attorney General's Corporate Oversight Division indicating that YouMail has captured over 26,000 calls being made into Michigan since January 2021 related to the fake AT&T DirecTV campaign. As of December 16, 2021, YouMail had captured 31,465 calls being made to Michigan area codes. He is able to state with confidence that a conservative estimate is that, on average, Michigan is receiving half a million calls related to this campaign per month into the State. (*Id.*)

19. On December 6, 2021, a Michigan resident with a cell phone number registered on the National Do Not Call Registry received a call leaving a voicemail message purporting to be from AT&T/DirecTV, with a caller ID message of "1-203-734-2358 Derby CT." Jeff Campbell, an investigator with the Michigan Department of Attorney General in the Criminal Investigations Division, was assigned to review this robocall voicemail. (See Affidavit of Jeff Campbell, **Attachment F**)

20. On December 7, 2021, Special Agent Campbell called the number from the voicemail message, 855-423-7715, and audio was recorded. The number was answered by an automated system purporting to be AT&T/DirecTV. Special Agent Campbell selected option number 5 ("limited time discount offers") from the voice

menu, and then the call was answered by a male who identified himself as “Freddie.” Using an undercover identity, Special Agent Campbell advised Freddie that he had received a voicemail offering a 50% discount on DirecTV. In response, Freddie proceeded to inform him of the terms of this offer, which included a “no contract” offer of DirecTV services for a term of two years at a rate of \$80.62 per month. When the offer was accepted, Freddie informed Special Agent Campbell of the process for paying for this service, which included the purchase of eBay “pre-paid loadable billing cards” to pay for an upfront cost of \$483.72 to start the service. (*Id.*)

21. ITG/UST has completed a traceback of the December 6, 2021 call identifying the originating voice service provider bringing the call into the U.S. (or onto the U.S. telephone network) as well as other information relating to the call; but requires a subpoena for the traceback information to be provided to the Attorney General.

22. The Michigan Home Solicitation Sales Act was amended in 2002 to regulate telephone solicitation calls (telemarketing). It applies to calls made from within or outside of Michigan, including calls made by use of autodialing. MCL 445.111(n).

23. Robocalls are addressed in Section 1a(1), which provides, “A home solicitation sale shall not be made by telephonic solicitation using in whole or in part a prerecorded message. A person shall not make a telephone solicitation that consists in whole or in part of a recorded message. MCL 445.111a(1).

24. "Telephone solicitor" is defined as "any person doing business in this state who makes or causes to be made a telephone solicitation from within or outside of this state, including, but not limited to, calls made by use of automated dialing and announcing devices or by a live person." MCL 445.111(n). ThinQ is a "telephone solicitor" involved in the fake DirecTV campaign, as it provides cloud-based calling services to the caller, and otherwise accepts the illegal robocalls onto its network, bringing the calls into, and then routed throughout, the United States, therefore, causing these calls to be made.

25. Spoofing, in which the caller uses false or misleading Caller ID, is addressed by Section 1b(3), which provides: "A telephone solicitor shall not intentionally block or otherwise interfere with the caller ID function on the telephone of a residential telephone subscriber to whom a telephone solicitation is made so that the telephone number of the caller is not displayed on the telephone of the residential telephone subscriber. MCL 445.111b(3).

26. Calling a Michigan resident whose number is registered on the Do Not Call Registry is also prohibited by, and a violation of, the MHSSA; MCL 445.111a(4).

27. The MCPA defines unfair and deceptive trade practices that are illegal in the State of Michigan. See MCL 445.903. Among the prohibited practices are "[c]ausing a probability of confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods or services." MCL 445.903(1)(a). Through the robocall tracebacks conducted by the ITG/UST and the contents of

Special Agent Campbell's December 7, 2021 call with the Unknown Caller, there is probable cause to believe that these callers are not from AT&T DirecTV and that the callers will attempt to extort money from Michigan residents.

28. The MCPA also prohibits "violating 1971 PA 227 [the MHSSA], MCL 445.111 to 445.117, in connection with a home solicitation sale or telephone solicitation." MCL 445.903(1)(gg). More simply stated: violations of the MHSSA are also MCPA Violations. Through the robocall tracebacks conducted by ITG/UST, the Attorney General's Corporate Oversight Division has probable cause to believe that Respondent thinQ and other Unknown VoIP Provider Respondents caused recorded telephone solicitations to be made to Michigan residents in violation of the MCPA when they accepted the robocalls onto their telecommunications networks and sent them into the U.S. to reach Michigan phone numbers. Probable cause also exists that such calls were in violation of the spoofing and do not call prohibitions of the MHSSA.

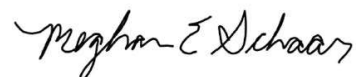
29. Finally, the MCPA also prohibits "[a]dvertising or representing goods or services with intent not to dispose of those goods or services as advertised or represented." MCL 445.903(1)(g). Based on information from Special Agent Campbell, the ITG/UST, and YouMail, there is probable cause to believe the calls were made not to actually provide DirecTV services at a discount, but to induce residents of the state of Michigan to pay for something that would never be delivered.

IV. Conclusion and Relief Sought

30. The Attorney General has brought this Petition for the purpose of opening an investigation into this matter. Authorization is sought for subpoenas to USTelecom and ThinQ to learn the identity of the caller(s) and VoIP/voice service providers related to the AT&T DirecTV campaign, and any other relevant information; including, as to thinQ and other identified Respondent VoIP providers, contractual and financial arrangements with the originating callers or other originating provider, business practices related to calls accepted and made on their respective networks and compliance with applicable telemarketing laws, traceback request responses, detailed call records relating to suspected illegal robocalls, and other relevant information. Further, authorization to issue additional subpoenas based on what is learned through this effort is requested.

31. Accordingly, the Attorney General respectfully requests authorization to issue subpoenas pursuant to the proposed order submitted as **Attachment G**.

Respectfully submitted,



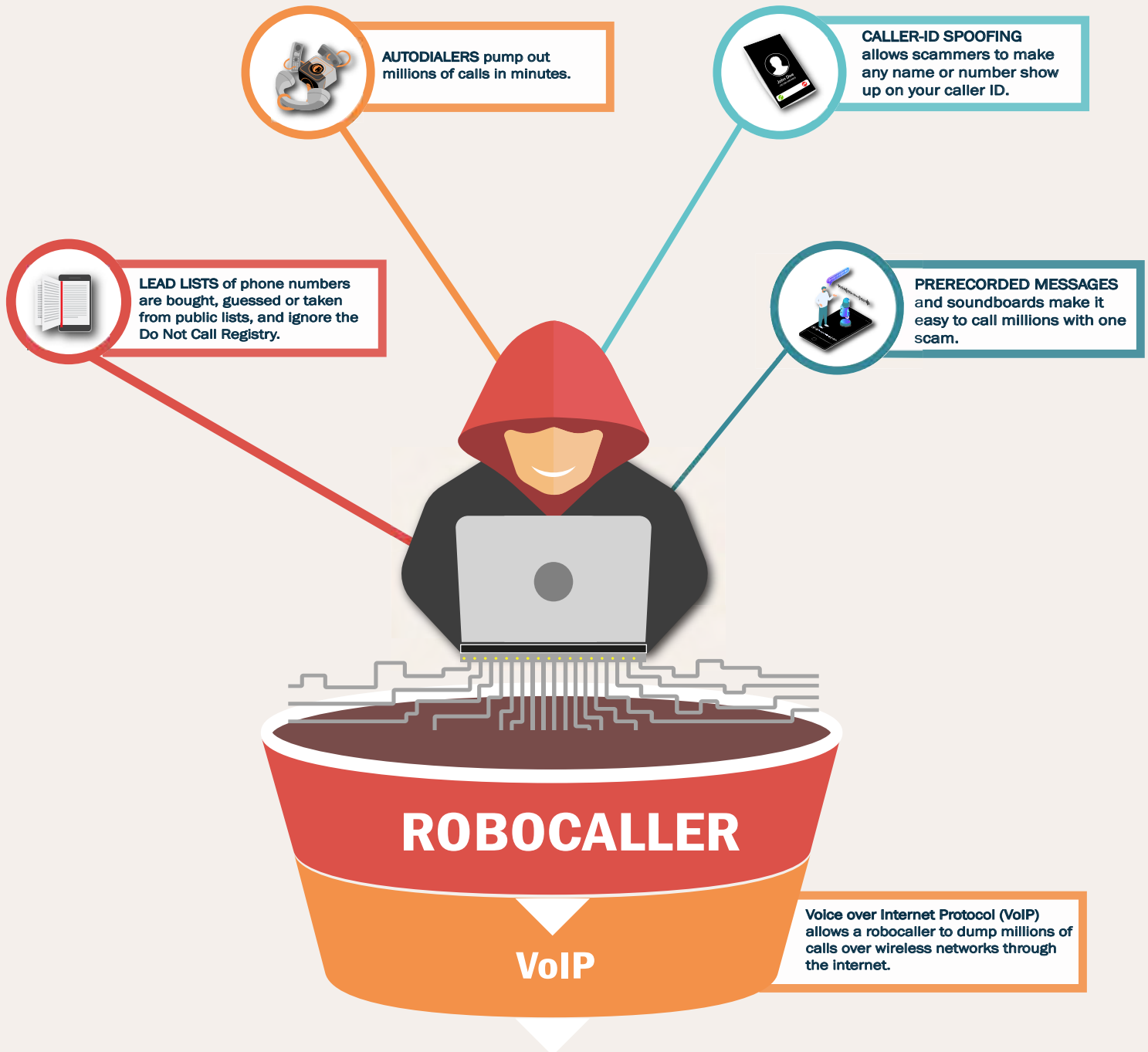
Meghan E. Schaar (P78736)
Assistant Attorney General
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Dated: January 18, 2022

ATTACHMENT A

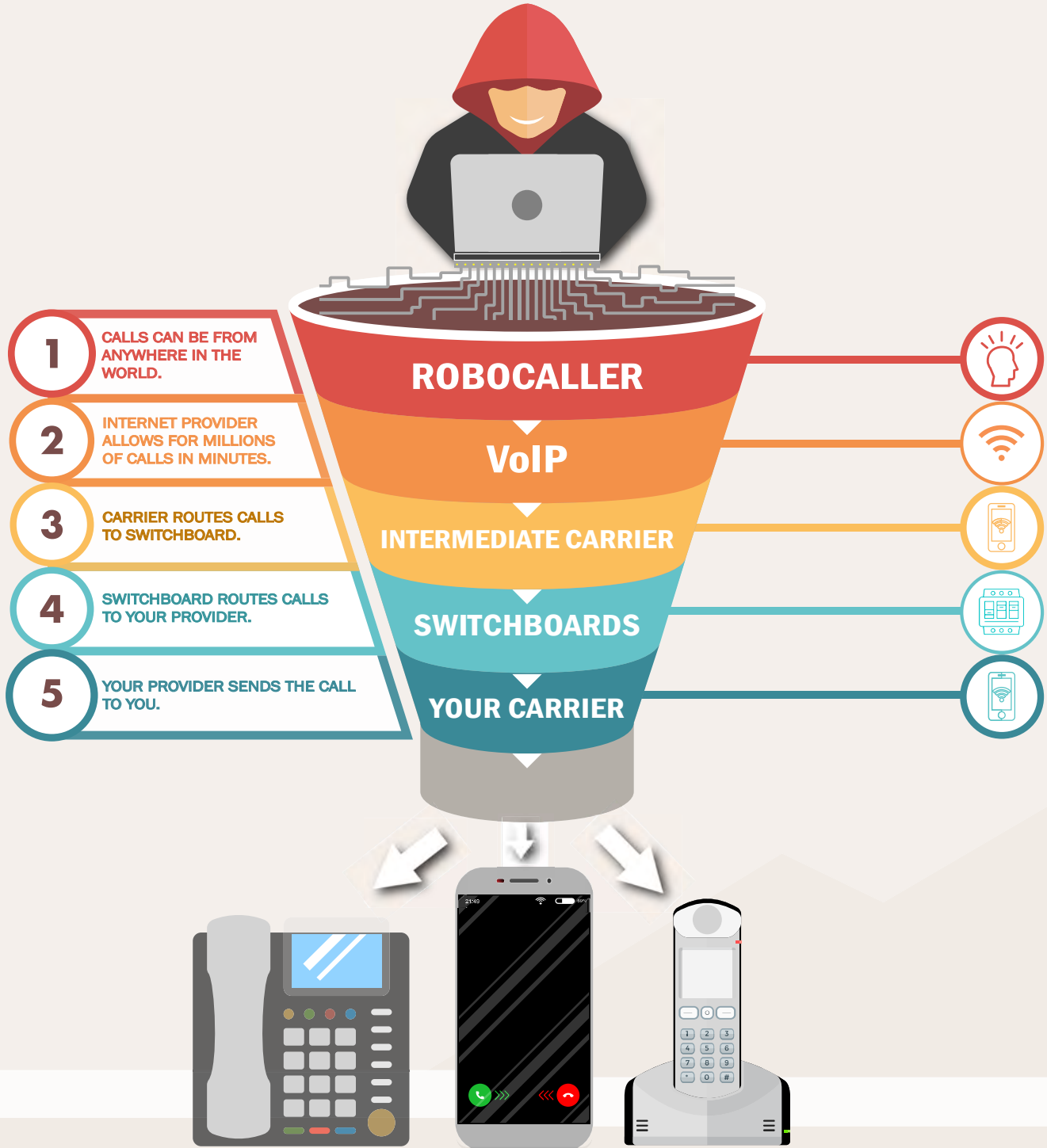
ANATOMY OF A ROBOCALL - PART ONE

ROBOCALLERS CAN EASILY AND CHEAPLY DOWNLOAD THESE TOOLS:



**ROBOCALL
CRACKDOWN TEAM**

ANATOMY OF A ROBOCALL - PART TWO



ATTACHMENT B

Industry Traceback Group



In 2019, ITG average monthly tracebacks increased by 550%.

1000+ tracebacks were conducted by 100+ companies, implicating more than 10 million illegal robocalls.

The USTelecom Industry Traceback Group (ITG) is a collaborative effort of more than 30 companies from across the wireline, wireless, VoIP and cable industries that actively trace and identify the source of illegal robocalls.

What is the Industry Traceback Group?

The ITG facilitates a neutral coordination platform for voice service providers to trace and identify the source of illegal robocalls, in order to provide for the robust protection of voice networks and users of such services from fraudulent, abusive and/or unlawful robocalls. The ITG collaborates with federal and state law enforcement agencies to identify non-cooperative providers so they can take enforcement action, as appropriate.

The ITG operates under the auspices of the Communications Act (Section 222(d)(2)) which permit telecom carriers to disclose and/or permit access to Customer Proprietary Network Information if suspected fraud, abuse or unlawful use of services exist.

What is Government Saying about USTelecom's ITG?

- **Federal Communications Commission**

FCC Chairman Ajit Pai publicly acknowledged that “USTelecom has been particularly helpful in making sure that we can quickly trace scam robocalls to their originating source” and called USTelecom an “important ally in promoting broad industry participation in these traceback efforts.” In a letter commending the work of the ITG, the Chief of the FCC’s Enforcement Bureau said traceback information “has been invaluable in helping Enforcement Bureau staff identify patterns and common sources of harmful traffic.”

- **Federal Trade Commission**

An FTC action against illegal robocallers specifically acknowledged the assistance of USTelecom in bringing to justice an individual responsible for generating millions of illegal robocalls and calls to phone numbers listed on the Do Not Call Registry, including calls using “spoofed” caller ID information.

- **State Attorneys General**

In August 2019, all 50 State Attorneys General and 12 national voice service providers announced their shared commitment to ending illegal robocalls, including a commitment to “allow for timely and comprehensive law enforcement efforts against illegal robocallers, [and to] dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from USTelecom’s Industry Traceback Group.”

- **Department of Justice**

In January 2020, DOJ filed civil actions against companies and individuals allegedly responsible for carrying hundreds of millions of fraudulent robocalls to American consumers. The illegal robocalls originated in India, leading to massive financial losses for elderly and vulnerable consumers. USTelecom’s ITG was cited by DOJ for providing critical data to track down the scammers behind these calls.

Learn More: <https://www.ustelecom.org/the-ustelecom-industry-traceback-group-itg/>

ITG MEMBERS

PLATINUM PARTNERS

AT&T



VERIZON



COMCAST



GOLD PARTNERS

CENTURYLINK



CHARTER COMMUNICATIONS



COX COMMUNICATIONS



SPRINT



T-MOBILE



SILVER PARTNERS

CONSOLIDATED COMMUNICATIONS



FRONTIER



U.S. CELLULAR



WINDSTREAM



BRONZE PARTNERS

ANI NETWORKS



BANDWIDTH



BRIGHTLINK



BUSINESS TELECOMMUNICATIONS SERVICES



INTELIQUENT



O1 COMMUNICATIONS



BRONZE PARTNERS (cont.)

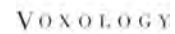
PEERLESS NETWORK



TWILIO



VOXOLOGY



WEST TELECOM



XCAST LABS



YMAX



AFFILIATE MEMBERS

ALLIANCE GROUP SERVICES

BELL CANADA

CINCINNATI BELL

GOOGLE

HD TANDEM

IDT TELECOM

IMPACT TELECOM

SILVER STAR COMMUNICATIONS

ATTACHMENT C

USTelecom Robocall Campaign Report Traceback Results Summary

Campaign Name: Discount-DirectTV50

Report# 10-003

Report Date: Oct 20, 2021

Date Range Selected: Feb 12, 2021 to Oct 06, 2021

Campaign First Traced: Sep 3, 2020

Most Recent Traceback: Oct 06, 2021

Total Tracebacks: 44

Summary: The ITG successfully identified the originator for 31 tracebacks as seen below. 13 tracebacks ended at a non-responsive provider.

Description: Caller claims to be from ATT DirectTV offering 50 percent discount and requesting callback. Calls are NOT from DirectTV; caller will attempt to extort money via prepayment.

Audio Example: <https://prod-incident-audio-123941.s3.us-east-1.amazonaws.com/b794ea337787cb90579738eb68ee7b288da84164-asdf-s6diZGlyX3dqBWRpcip0b21jYXQxMzY1OjE2MzMONTEwMzQ1ODJNFBjNEo.gen.wav>

Terminating States: AL, AR, AZ, CA, CO, CT, FL, GA, IL, IN, KS, KY, LA, MD, MI, NC, NJ, NY, PA, RI, SC, SD, VA, VT, WA

TB Hop Count	Hop Provider	Notes
1	382 Communications	POE
1	CallVox	POE
1	Iristel	FPD, NR
1	Ace Peak Investments	FPD
1	Worldcall Telecom SRL	IOR
30	Kosmo Communications	ORG, POE
3	Sip Connector	NR
9	A to Z Minutes	FPD, NR
1	thinQ	ORG

Mitigation: ThinQ followed up with client. Kosmos Communications blocked end users from their network. Worldcall Telecom SRL has blocked customer from their routing.

ATTACHMENT D

Robocall Campaign Report Traceback Results Summary

Campaign Name: Discount-DirectTV50

Report# 11-006

Report Date: Nov 19, 2021

Date Range Selected: Nov 3, 2021 to Nov 17, 2021

Campaign First Traced: Sep 3, 2020

Most Recent Traceback: Oct 06, 2021

Total Tracebacks: 28

Summary: The ITG successfully identified the originator for 7 tracebacks as seen below. 21 tracebacks ended at a non-responsive provider.

Description: Caller claims to be from ATT DirectTV offering 50 percent discount and requesting callback. Calls are NOT from DirectTV; caller will attempt to extort money via prepayment.

Audio Example: <https://prod-incident-audio-123941.s3.us-east-1.amazonaws.com/b794ea337787cb90579738eb68ee7b288da84164-asdf-s6diZGlyX3dqbWRpcjp0b21jYXQxMzY1OjE2MzMONTEwMzQ1ODJNFBjNEo.gen.wav>

Terminating States: AL, AR, AZ, CA, CO, CT, FL, GA, IL, IN, KS, KY, LA, MD, MI, NC, NJ, NY, PA, RI, SC, SD, VA, VT, WA

TB Hop Count	Hop Provider	Notes
2	Airesping	POE
2	Centurylink / Lumen / Qwest / Level3	POE
9	Inteliquent / Onvoy / Vitelity / Neutral Tandem	POE
2	Bell Canada	FPD
9	Evernex SMC PVT LTD	FPD, NR
2	Predator Studio	FPD, NR
7	thinQ	ORG
10	Inbound Inc.	NR

Mitigation: ThinQ terminated calling party's service.

ATTACHMENT E

AFFIDAVIT OF MICHAEL RUDOLPH

Michael Rudolph, being first duly sworn, deposes and says as follows:

1. I am the Chief Technology Officer for YouMail, Inc. ("YouMail").
2. YouMail, Inc provides a call answering services to over 11 million registered telephone users in the United States. Consumers can opt into the YouMail service by changing the conditional call forward setting provided by their mobile phone operators (*i.e.*, Verizon, AT&T, T-Mobile and over one hundred others in the USA) which enables YouMail to answer any calls those consumers do not answer. As an information service acting as an agent on behalf of these consumers, YouMail will capture the voicemail audio from callers and transcribe that audio into text that can be read.
3. YouMail operates the YouMail Sensor Network, which takes these answered calls at scale across all carriers and pairs them up with machine learning (ML) and artificial intelligence (AI) technologies to provide a method of discovering and measuring calls to the US Public Telephone Network based on the audio content of those calls regardless of their originating numbers. As such, any particular voice calling campaign can be isolated and investigated regardless of the origination numbers or service providers of that calling campaign.
4. Beginning in August 2020, YouMail began identifying and tracking a series of distinct calling campaigns purporting to be from AT&T Direct TV offering the called party a 50% off discount on a DirecTV subscription service. The full transcription of the audio of these calls says:

“Hi, I’m calling you from AT&T Direct TV to let you know that your account is qualified for 50% off in order to obtain the discount kindly call us back on the number you see on your caller ID. Thank you. And have a great day.”

5. YouMail also conducted a more detailed analysis of calls made to individuals within the state of Michigan.

6. For purposes of YouMail’s Michigan analysis, it relied specifically on calls made to the following Michigan area codes: 231, 248, 269, 313, 517, 586, 616, 734, 810, 906, 989.

7. YouMail has just over 31,465 calls captured from 25,044 unique originating numbers, each with full audio and transcription from January 1, 2021 through December 16, 2021 into Michigan that relate to the DirecTV campaign. YouMail may have answered additional calls related to this campaign, but these samples represent ones that YouMail did not outright reject taking voicemail messages or opted to not transcribe the audio into text for convenient analysis. These calls into Michigan rarely re-use an originating number – in November 2021, 5061 calls originated from 4633 numbers distinctly different from the numbers used in October, September or any previous month.

8. For the fifteen-day period from December 1 to December 15, alone, 2,255 captured calls from 1,752 unique originating numbers made into Michigan have been individually answered with their recording saved and their audio transcribed into text for this analysis.

9. As mentioned previously, the YouMail Sensor Network samples a percentage ranging from 0.25% to 5% of U.S. metropolitan regions which allows it to accurately determine the approximate number of calls from given campaigns to that region over time.


10. YouMail maintains population estimates for these regions of individuals who receive mobile phone calls and based on these population estimates and the size of the YouMail Sensor Network within these metro-regions, approximates how many individuals receive similar calls in a given time period.

11. In 2021, about 1 in 170 of Michigan's "adult mobile phone population" (~40,000 of ~6.5M) is using YouMail to answer their mobile phone calls.

12. I can with confidence, provide a conservative estimate that on average since June 2021, Michigan is now receiving over 1 million of these calls per month.

13. I have personal knowledge of the facts stated in this affidavit and I am competent to testify about them if called upon to do so.

FURTHER, AFFIANT SAYTH NOT.


MICHAEL RUDOLPH

Subscribed and sworn to before me
this _____ day of _____, 2021.

_____, Notary Public
_____, County, _____
Commission Expires:

Customized
Loose Certificate
October

JURAT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

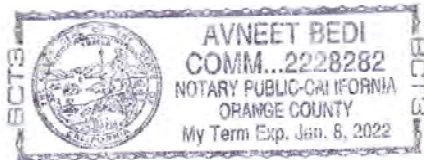
County of ORANGE

Subscribed and sworn to (or affirmed) before me on this 5th day of January,
2022 by MICHAEL RUDOLPH.

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature

(Seal)



OPTIONAL INFORMATION

INSTRUCTIONS

DESCRIPTION OF THE ATTACHED DOCUMENT

(Title or description of attached document)

(Title or description of attached document continued)

Number of Pages 2/3 Document Date 01/03/2022

Additional information

The wording of all Jurats completed in California after January 1, 2015 must be in the form as set forth within this Jurat. There are no exceptions. If a Jurat to be completed does not follow this form, the notary must correct the verbiage by using a jurat stamp containing the correct wording or attaching a separate jurat form such as this one with does contain the proper wording. In addition, the notary must require an oath or affirmation from the document signer regarding the truthfulness of the contents of the document. The document must be signed AFTER the oath or affirmation. If the document was previously signed, it must be re-signed in front of the notary public during the jurat process.

- State and county information must be the state and county where the document signer(s) personally appeared before the notary public.
- Date of notarization must be the date the signer(s) personally appeared which must also be the same date the jurat process is completed.
- Print the name(s) of the document signer(s) who personally appear at the time of notarization.
- Signature of the notary public must match the signature on file with the office of the county clerk.
- The notary seal impression must be clear and photographically reproducible. Impression must not cover text or lines. If seal impression smudges, re-seal if a sufficient area permits, otherwise complete a different jurat form.
 - ❖ Additional information is not required but could help to ensure this jurat is not misused or attached to a different document.
 - ❖ Indicate title or type of attached document, number of pages and date.
- Securely attach this document to the signed document with a staple.

ATTACHMENT F

AFFIDAVIT OF JEFFREY CAMPBELL

Jeffrey Campbell, being first duly sworn, deposes and says as follows:

1. I am an Investigator at the Michigan Department of Attorney General in the Criminal Investigations Division. I have been an Investigator with this Office for 1 ½ years.
2. In my capacity as an Investigator for the Criminal Investigations Division, I was assigned to review a robocall voicemail purported to be from AT&T/DirecTV offering a 50% discount to existing customers. I was also asked to call the toll-free number in the voicemail and make a recording of this call. The purpose of this affidavit is to explain the findings of my investigation.
3. When I received this assignment, I was provided with information indicating that a voicemail purporting to be AT&T/DirecTV was received on 12/6/21 at approximately 11:20am. The number displayed on the caller ID for this call was 203-734-2358.
4. The information I found online regarding the caller number indicates it registered to the name of Dictaphone, Camille C. The phone number carrier is the Southern New England Telephone Company located in Ansonia, CT.
5. After reviewing the voicemail recording, I called the number from the voicemail message, 855-423-7715, at approximately 1:02 pm on 12/7/21. This call was audio recorded.
6. In summary, when I called this number, it was answered by an automated system purporting to be AT&T/DirecTV. I selected option number 5

(“limited time discount offers”) from the voice menu, and then my call was answered by a male who identified himself as “Freddie.” Using an undercover identity, I advised Freddie that I had received a voicemail offering a 50% discount on DirecTV. In response, Freddie proceeded to inform me of the terms of this offer, which included a “no contract” offer of DirecTV services for a term of two years at a rate of \$80.62 per month.

7. After I accepted this offer, Freddie informed me of the process for paying for this service. This process included the purchase of eBay “pre-paid loadable billing cards” to pay for an upfront cost of \$483.72 to start the service.

8. Freddie also informed me that if I paid this bill within the next two hours using the eBay loadable billing card, I would also receive a \$200 Visa reward gift card as part of the promotion. I was directed to purchase the eBay billing cards from a store like Walgreens, and then call their “billing and finance department” at 844-700-1231 or 855-630-2518 to make the payment by giving them the scratch off number on the billing card.

9. Shortly after ending this call, at approximately 1:47 pm, I received a text message from 323-986-3679 on the department issued cell phone I used to make the call. This text message is depicted in the screenshot attached to this affidavit.

10. Through online research, I found that 323-986-3679 is operated by a company called Twilio International, Inc. located at 375 Beale St. Ste #300, San Francisco, CA.


11. I researched the toll-free phone numbers involved in this investigation online but was unable to find much information about where they originated, or any actual connection to AT&T/DirecTV for any of them.

12. On 12/7/21, I reached out to Joel Bernstein of SOMOS, the Federal Communications Commission's appointed Toll-Free Numbering Administrator (TFNA). He advised me that his office was aware of the AT&T/DirecTV scam and had shut down numerous toll-free numbers previously used by the scammers pretending to be AT&T/DirecTV.


13. Mr. Bernstein also advised me that the Responsible Organization (Resp Org) for all three toll free numbers is a company called Intrado Communications. He indicated that Intrado obtained 855-423-7715 on 11/7/21, 844-700-1231 on 11/12/21, and 855-630-2518 on 11/18/21.

14. I have personal knowledge of the facts stated in this affidavit and I am competent to testify about them if called upon to do so.

FURTHER, AFFIANT SAYTH NOT.


JEFFREY CAMPBELL

Subscribed and sworn to before me
this 15 day of December, 2021.


_____, Notary Public
Shiawassee County, Acting in Ingham
Commission Expires: 4/14/2028

SUSAN L. BANNISTER
NOTARY PUBLIC, STATE OF MI
COUNTY OF SHIAWASSEE
MY COMMISSION EXPIRES Apr 14, 2028
ACTING IN COUNTY OF Ingham