

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of
Best Insurance Contracts, Inc., and
Philip Roesel, dba Wilmington Insurance Quotes
File No.: EB-TCD-16-00023195

CITATION AND ORDER

PRERECORDED VOICE MESSAGE VIOLATIONS

Adopted: August 4, 2017

Released: August 4, 2017

By the Deputy Chief, Enforcement Bureau:

I. INTRODUCTION

1. The Bureau has conducted an extensive investigation and identified Best Insurance Contracts, Inc., and Philip Roesel, doing business as Wilmington Insurance Quotes (collectively, Roesel), as the originator of more than 21 million illegal robocalls. This CITATION AND ORDER (Citation), notifies Roesel that Roesel violated the law by making unauthorized and disruptive prerecorded telemarketing calls—or robocalls—to emergency phone lines, wireless phones, and residential phone lines without prior express written consent and absent an emergency purpose. Further, Roesel violated the law by initiating telephone solicitations, without prior express written consent, to subscribers who had registered their telephone numbers on the national Do-Not-Call registry. We therefore direct Roesel to take immediate steps to comply with the Communications Act of 1934, as amended (Communications Act or Act), the Telephone Consumer Protection Act (TCPA), and the Federal Communications Commission’s (Commission) rules (Rules), which prohibit (1) making autodialed, artificial or prerecorded voice message calls to emergency phone lines, wireless phones, or residential telephone lines unless the calls are made for emergency purposes or with the prior express consent of the called party, and (2) initiating telephone solicitations to telephone lines registered on the national Do-Not-Call registry without prior express written consent. If Roesel fails to comply with these laws, he may be liable for significant fines.

2. Notice of Duty to Comply With Law: We issue this Citation pursuant to Section 503(b)(5) of the Communications Act of 1934, as amended (Act),<sup>1</sup> which states that the Commission may not impose monetary forfeitures against non-regulatees who violate the Act or the Rules unless and until: (a) the Commission issues a citation to the violator; (b) the Commission provides the violator a reasonable opportunity to respond; and (c) the violator subsequently engages in conduct described in the citation.<sup>2</sup> Accordingly, Roesel is hereby on notice that Best Insurance Contracts, Inc., and Philip Roesel,

<sup>1</sup> 47 U.S.C. § 503(b)(5). Under Section 503(b)(5) of the Act, a person who does not hold a license, permit, certificate, or other authorization issued by the Commission, or is not an applicant for the same, may not be issued a Notice of Apparent Liability for Forfeiture unless: (1) that person is first sent a citation of the violation charged; (2) is given an opportunity for a personal interview with an official of the Commission; and (3) subsequently engages in conduct of the type described in such citation. 47 U.S.C. § 503(b)(5). In addition to this Citation, the Commission contemporaneously released a Notice of Apparent Liability for Forfeiture against Roesel for apparent violations of the Truth In Caller ID Act of 2009. In contrast to the TCPA, the Truth In Caller ID Act only requires that the Commission provide the notice required under Section 503(b)(3) of the Act (notice and opportunity for a hearing before the Commission or an administrative law judge) or Section 503(b)(4) of the Act (Notice of Apparent Liability for Forfeiture) before assessing a forfeiture for unlawful spoofing. 47 U.S.C. § 227(e)(5)(A).

<sup>2</sup> See 47 U.S.C § 503(b)(5); see also 47 CFR § 1.80(a)(5).

doing business as Wilmington Insurance Quotes (or any entity through which Roesel does business) must comply with Section 227 of the Act and Section 64.1200 of the Rules. If Roesel subsequently engages in any conduct of the type this Citation describes—and specifically any violation of the Act and Rules that govern solicitations, artificial/prerecorded voice message calls, and autodialed telephone calls<sup>3</sup>—Roesel may be subject to further legal action, such as civil penalties, including substantial monetary forfeitures. In assessing such forfeitures, the Commission may consider both the conduct that led to this Citation and the conduct following it.<sup>4</sup>

## II. BACKGROUND

3. Pursuant to the Act and the Rules, consumer consent is required prior to making autodialed or artificial/prerecorded voice message calls—commonly known as robocalls—to emergency telephone lines or to consumers’ wireless phones. Similarly, pursuant to the Act and the Rules, express written consent is required prior to making telephone solicitations to telephone lines registered on the national Do-Not-Call registry. Although Congress and the Commission have long worked to protect consumers from illegal, unwanted, and disruptive robocalls, such calls persist as the number one consumer complaint to the Commission. As technology has advanced, these calls have become more prevalent, more threatening, and even more challenging to prevent. Along with advanced and low cost spoofing technology, nefarious robocallers can easily hide their true identities from consumers and cause a variety of harms, including the disruption of consumer privacy.

4. The evidence indicates that Roesel is the perpetrator of systematic and substantial illegal robocalling campaigns—making more than 21 million illegal robocalls in just a three-month period. As explained in greater detail below, during late 2016 and early 2017, Roesel engaged in mass-robocalling campaigns related to the solicitation of insurance plans. Roesel’s calls overwhelmed American consumers and repeatedly disrupted a critical communications service used by hospitals and emergency medical providers. Roesel’s large-scale and systematic robocalling campaigns violate the Communications Act and the Commission’s Rules.

### A. Robocalls Offering Health Insurance

5. In recent years, robocalls have been used increasingly by the health insurance industry to generate health insurance leads and sales.<sup>5</sup> In December 2016, Spök, Inc. (Spök), which provides paging services to medical providers, submitted an informal complaint with the Bureau about a significant robocalling event that was disrupting its emergency medical paging service.<sup>6</sup> After the company received complaints from its paging customers about service disruptions, Spök investigated and was able to identify a large number of prerecorded message calls hitting its network. Spök determined that the

---

<sup>3</sup> See 47 U.S.C. § 227; 47 CFR § 64.1200. Section 227 was added to the Communications Act by the Telephone Consumer Protection Act of 1991, Pub. L. No. 102-243, 105 Stat. 2394 (codified at 47 U.S.C. § 227), and is most commonly known as the TCPA. The TCPA and the Commission’s rules restrict a variety of practices that are associated with telephone solicitation and the use of the telephone network to deliver unsolicited advertisements or prerecorded/artificial voice and autodialed telephone calls.

<sup>4</sup> See S. Rep. No. 95-580, 95th Cong., 1st Sess. at 9 (1977) (explaining that a person or entity that has been issued a citation by the Commission that thereafter engages in the conduct for which the citation was issued, the subsequent notice of apparent liability “would attach not only for the conduct occurring subsequently *but also for the conduct for which the citation was originally sent*”) (emphasis added).

<sup>5</sup> See Michele Andrews, ‘You’ve Got Mail’: E-mails and Robocalls Hit Home in Promoting Medicaid Enrollment, Kaiser Health News (May 26, 2017), available at <http://khn.org/news/youve-got-mail-emails-and-robocalls-hit-home-in-promoting-medicaid-enrollment/>; see also Bridgette Small, *Phony Calls about Health Insurance*, February 18, 2016, Federal Trade Commission Website, available at <https://www.consumer.ftc.gov/blog/phony-calls-about-health-insurance>.

<sup>6</sup> See E-mail from Dexter Lee, Corporate Technical Operations Director, Spök, Inc., to Kristi Thompson, Deputy Chief, Telecommunications Consumers Division, FCC Enforcement Bureau (Dec. 14, 2016, 16:59 ET) (on file in File No. EB-TCD-16-00023195).

robocalls consisted of a prerecorded advertising message for health insurance policies. Spök, headquartered in Springfield, Virginia, provides paging services for hospitals, emergency rooms, and physicians.<sup>7</sup> Paging services are essential in hospitals and emergency rooms across the country, with an estimated 85 percent of hospitals relying on this technology to ensure that emergency room doctors, nurses, EMTs, and other first responders receive immediate alerts.<sup>8</sup> Because paging technology is not equipped to handle voice calls, a large-scale robocalling campaign will disrupt—and can potentially disable—the medical pager network. Service outages, slowdowns, or other problems caused by robocalls flooding a paging network constitute a serious risk to public safety because they interfere with critical hospital and emergency room communications.

6. Spök contacted the FCC to lodge an informal complaint about the unauthorized prerecorded message calls hitting its network. According to Spök, the robocalling event adversely affected 5,000 to 10,000 of its service subscribers.<sup>9</sup> The robocalling event harmed Spök’s customers by disrupting those customers’ pager numbers, which are used by doctors, hospitals and emergency first responders. Spök said that one of its subscribers is Palmetto Health, which operates seven hospitals serving Columbia, Greenville, and Sumter, South Carolina. Palmetto Health is the largest health resource in the South Carolina Midlands region.<sup>10</sup> According to Spök, Palmetto Health experienced intermittent pager disruptions as a result of the massive influx of unauthorized robocalls to Spök’s network.<sup>11</sup>

7. From the information provided by Spök, the Commission traced the disruptive calls to Philip Roesel. Philip Roesel does business under at least two different names. First, Philip Roesel sells insurance plans (including medical insurance and life insurance) under the unregistered name “Wilmington Insurance Quotes” and its accompanying website, [wilmingtoninsurancequotes.com](http://wilmingtoninsurancequotes.com) (WIQ).<sup>12</sup> The WIQ domain name is registered to Philip Roesel in his personal name and at his [REDACTED] address; the website features a prominent photograph of Philip Roesel along with his name, personal e-mail address, his [REDACTED] address, his personal cell phone,<sup>13</sup> and a toll-free phone number. Second, Philip Roesel does business under the name “Best Insurance Contracts, Inc.” (BIC). Roesel describes himself as the “CEO and founder” of BIC, which is incorporated in North Carolina.<sup>14</sup> BIC’s

---

<sup>7</sup> See Spök Website, <http://www.spok.com/> (last visited July 31, 2017).

<sup>8</sup> See *Hospitals turning a ‘pager’ on data hardware*, The Boston Globe (Feb. 2, 2016), <https://www.bostonglobe.com/business/2016/02/01/beep-this-accessory-busy-doctors-finally-gets-upgrade/gRcjTy7w3RuTJiqaeKTsEN/story.html>.

<sup>9</sup> See E-mail from Dexter Lee, Corporate Technical Operations Director, Spök, Inc., to Kristi Thompson, Deputy Chief, Telecommunications Consumers Division, FCC Enforcement Bureau (June 20, 2017, 10:16 ET) (on file in File No. EB-TCD-16-00023195); see also Declaration of Kimbarly H. Taylor, May 22, 2017 (on file in File No. EB-TCD-16-00023195).

<sup>10</sup> See Palmetto Health Website, “About Palmetto Health,” <https://www.palmettohealth.org/patients-guests/about-palmetto-health> (last visited July 31, 2017).

<sup>11</sup> As soon as Spök identified the robocalls hitting its network, it immediately alerted its carriers (AT&T and Verizon) and Bureau staff. After receiving Spök’s reports about the unauthorized nature of the robocalls, and at Spök’s request, AT&T and Verizon were able to take steps to mitigate and reduce the number of illegal robocalls before they reached Spök’s subscribers.

<sup>12</sup> See LinkedIn page for Philip Roesel, <https://www.linkedin.com/in/philiproesel/> (last visited July 5, 2017) (on file in File No. EB-TCD-16-00023195).

<sup>13</sup> The subscriber phone records for the number [REDACTED] show that in 2015, the phone number was registered to Philip Roesel’s wife, Elizabeth Roesel, at their address in [REDACTED]. Subsequently, the phone number was ported to a new carrier under the name of Wilmington Insurance Quotes. Wilmington Insurance Quotes appears to be Philip Roesel doing business as Wilmington Insurance Quotes; the name is not registered as a company name in any state.

<sup>14</sup> The North Carolina Secretary of State lists Philip Roesel as the Best Insurance Contracts registered agent and the company’s principal office shares the same address as one of Roesel’s current personal addresses. See Best

(continued...)

website, bestinsurancecontracts.com, is registered to Philip Roesel in his personal name and at his [REDACTED] home address. Roesel's BIC company website prominently displays Philip Roesel's name, direct email address, his personal cell phone number,<sup>15</sup> and the same toll-free phone number featured on the WIQ website. According to the BIC website, the company offers consumers health insurance coverage (focusing on Medicare Supplements and Medicare Advantage Plans for the senior citizen market),<sup>16</sup> and provides tools to health insurance agents to generate health insurance leads and sales.<sup>17</sup>

## B. FCC Investigation

8. On January 24, 2017, Bureau staff subpoenaed Roesel's call records for the three-month period from October 23, 2016 to January 23, 2017 from a third-party robocall platform provider, [REDACTED].<sup>18</sup> According to subpoena responses received by the Commission, Roesel made 21,582,771 calls during this time frame,<sup>19</sup> averaging more than 200,000 calls a day.<sup>20</sup> Bureau staff analyzed a sample of 82,106 spoofed robocalls Roesel made using four specific numbers.<sup>21</sup> The evidence shows that the telephone numbers used were unassigned (i.e., not assigned to a carrier or a subscriber) during the relevant time frame. Accordingly, all the calls made by Roesel that displayed one of these four numbers in the called parties' caller IDs were not assigned to Roesel and were therefore spoofed. Because Roesel spoofed the caller IDs with an apparent intent to defraud, cause harm, or wrongfully obtain anything of value, these calls were illegal and an apparent violation of the Truth in Caller ID Act.

9. Based on the evidence collected during the investigation, the Commission issued a Notice of Apparent Liability for Forfeiture against Roesel for perpetrating massive spoofed robocall campaigns involving more than 21 million spoofed calls during a three-month period from late 2016 through early 2017.<sup>22</sup> Those spoofing violations are separate from, and in addition to, the illegal robocalls in violation of the Telephone Consumer Protection Act (TCPA) addressed in this Citation.

10. The Bureau analyzed the details of the 21,582,771 robocalls that Roesel made, using an industry-standard, commercially available software and database of known assigned and ported wireless numbers to determine whether any of the robocalls went to wireless phones.<sup>23</sup> From this analysis, Bureau

(Continued from previous page...)

Insurance Contracts, Inc. Corporate Filing, North Carolina Secretary of State Website, *available at* <https://www.sosnc.gov/Search/profcorp/12410762> (last visited June 14, 2017). According to the Best Insurance Contracts website, Roesel is the company's CEO and founder. *See* Best Insurance Contracts Website, *available at* <https://bestinsurancecontracts.com/wp/> (last visited July 31, 2017).

<sup>15</sup> *See supra* note 13.

<sup>16</sup> Best Insurance Contracts Website, <https://bestinsurancecontracts.com/wp/> (last visited July 31, 2017).

<sup>17</sup> *Id.*

<sup>18</sup> *See* Letter from Richard A. Hindman, Division Chief, Telecommunications Consumers Division, FCC Enforcement Bureau, to [REDACTED], [REDACTED], dated January 24, 2017 (on file in File No. EB-TCD-16-00023195).

<sup>19</sup> *See* Letter from William E. Raney, Copilevitz & Canter, Counsel for [REDACTED], to Richard A. Hindman, Division Chief, Telecommunications Consumers Division, FCC Enforcement Bureau (Mar. 10, 2017) (on file on File No. EB-TCD-16-00023195) ([REDACTED] Response).

<sup>20</sup> *Id.*

<sup>21</sup> Such robocalls constitute "any telecommunications service or Internet Protocol-enabled voice service" for the purposes of Section 227 of the Act.

<sup>22</sup> *Best Insurance Contracts, Inc., and Philip Roesel, dba Wilmington Insurance Quotes*, Notice of Apparent Liability for Forfeiture, FCC 17-107 (rel. Aug. 4, 2017).

<sup>23</sup> *See* Interactive Marketing Solutions, *EasyID*, <https://www.ims-dm.com/mvc/page/easyid/> (last visited June 13, 2017). EasyID is Interactive Marketing Solution's software that allows clients to eliminate wireless numbers from calling lists. *Id.* Interactive Marketing Solutions, Inc. is a member of the Direct Marketing Association and bills itself as "the country's largest single-source supplier" of data identifying telephone numbers that have been assigned

(continued...)

staff confirmed that 17,487,293 were robocalls to wireless phones, while 4,095,478 were robocalls to landline phones. Bureau staff randomly contacted 500 different recipients of robocalls made by Roesel and spoke with 59 of them to confirm that they were the owner of the affected telephone number and received the calls, and to ask whether the consumer gave Roesel permission to robocall them on the affected phone number.<sup>24</sup> None of the consumers that the Bureau spoke with gave permission—written or otherwise—to Roesel to make robocalls to their phones. Of the 59 consumers that the Bureau reached, 44 received robocalls from Roesel on their wireless numbers, 15 received robocalls on their residential lines.<sup>25</sup> We found the statements of these 59 consumers to be credible.

11. Roesel made millions of prerecorded message calls to consumers in order to drum up sales of the health insurance policies he and his associated agents<sup>26</sup> were selling. Roesel's prerecorded messages would entice recipients to press a number on their phones in order to be connected with Philip Roesel or one of his associated agents. The evidence shows that Philip Roesel intended to exploit some of the most vulnerable members of society through his health insurance robocalling campaign. For example, when Bureau staff reached out to recipients of the robocalls, staff discovered that most of the victims they spoke to appeared to be elderly consumers. Further, as part of its investigation, the Bureau also collected evidence from a person with first-hand experience working for Roesel, and who also received at least one of Roesel's illegal robocalls.<sup>27</sup> [REDACTED]

[REDACTED]. The employee told the Bureau that Philip Roesel and his associated agents made robocalls to generate leads and sales for health and life insurance products.<sup>28</sup> Further, the employee told investigators that Philip Roesel made money from his own sales and commissions from his associated agents' sales.<sup>29</sup> The employee noted that Philip Roesel was involved in a large robocalling enterprise and that he was well aware that his robocall activities were illegal.<sup>30</sup> Philip Roesel's employee told the Bureau that the robocalls were targeted toward vulnerable segments of society, including economically disadvantaged and less sophisticated consumers.<sup>31</sup> Philip Roesel's employee stated the following:

- Philip Roesel and his staff repeatedly “joked” and “laughed” about their robocalls being “illegal.”
- Philip Roesel would make 50,000 illegal robocalls in just a few hours. The robocalls were continuously made throughout the business day.
- Philip Roesel has been making illegal robocalls for “years.”
- Philip Roesel “makes a lot of money” from his illegal robocalls.

(Continued from previous page...) \_\_\_\_\_

or ported to wireless devices, “to help businesses comply with state and federal legislation.” Interactive Marketing Solution, Inc., Website, <https://www.ims-dm.com/mvc/index.php> (last visited June 13, 2017).

<sup>24</sup> See Declarations of Lisa Landers, May 4, 2017, May 8, 2017, May 22, 2017, May 25, 2017; Declaration of Stacy Ruffin-Smith, April 4, 2017; Declaration of Tamara Baxter, May 4, 2017; Declarations of Ann Morgan, April 11, 2017, June 7, 2017; Declaration of Coly Marierose, May 8, 2017; Declarations of Vilma Anderson, May 8, 2017, June 12, 2017; Declaration of Susan German, June 8, 2017 (on file in File No. EB-TCD-16-00023195).

<sup>25</sup> *Id.*

<sup>26</sup> Some of Roesel's associated agents are listed on the Best Insurance Contracts website. See Best Insurance Contracts Website, <https://bestinsurancecontracts.com/wp/> (last visited June 14, 2017).

<sup>27</sup> See Declaration of Lisa Landers, May 25, 2017 (on file on File No. EB-TCD-16-00023195). The evidence confirms the employee's association with Roesel and his company, Best Insurance Contracts. See [REDACTED] Response.

<sup>28</sup> See Declaration of Kimbarly H. Taylor, May 25, 2017 (on file in File No. EB-TCD-16-00023195).

<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

- Philip Roesel instructed the former employee to hang up on consumers if “they asked too many questions.”
- Philip Roesel told the employee that the goal was to market to economically disadvantaged and unsophisticated consumers, stating that “the dumber and more broke, the better.”<sup>32</sup>

### III. APPLICABLE LAW AND VIOLATIONS

12. In 1991, Congress passed the TCPA to prohibit certain autodialed and artificial/prerecorded message calls to emergency lines, wireless, and residential telephone lines made without the called party’s consent.<sup>33</sup> Congress expressed concern that “automated calls are placed to lines reserved for emergency purposes, such as hospitals and fire and police stations” and that “some automatic dialers will dial numbers in sequence, thereby tying up all the lines of a business and preventing any outgoing calls.”<sup>34</sup> Congress noted that such calls were not only a nuisance, an invasion of privacy, and an impediment to interstate commerce, but also a serious threat to public safety.<sup>35</sup> In 1992, the Commission adopted rules implementing the TCPA.<sup>36</sup> Further, in 2003, the FCC revised its TCPA rules to establish, in coordination with the Federal Trade Commission (FTC), a national Do-Not-Call registry.<sup>37</sup> The national registry is nationwide in scope, covers all telemarketers (with the exception of certain nonprofit organizations), and applies to both interstate and intrastate calls. The registry went into effect on October 1, 2003. By revising its TCPA rules and establishing a national Do-Not-Call registry, the Commission provided consumers with options for avoiding unwanted telephone solicitations.

13. Based on the evidence gathered in the Bureau’s investigation, we find that Roesel violated multiple provisions of the Communications Act and the Rules. Specifically, we find that Roesel violated provisions of the TCPA and the Commission’s rules that prohibit making (1) prerecorded voice message calls to emergency telephone lines,<sup>38</sup> (2) prerecorded voice message calls to cell phones,<sup>39</sup> (3) prerecorded telemarketing calls to residential phone lines without prior express written consent absent an emergency purpose,<sup>40</sup> and (4) telephone solicitations to telephone lines registered on the national Do-Not-Call registry without prior express written consent.<sup>41</sup>

#### A. Violations of TCPA

14. Prohibitions Against Prerecorded Voice Messages. The TCPA prohibits certain prerecorded message calls to consumers. Section 227(b)(1)(A)(i) of the Communications Act and Section 64.1200(a)(1)(i) of the Rules prohibit calls made using any automatic telephone dialing system or an artificial or prerecorded voice message to “any emergency telephone line, including any 911 line and any emergency line of a hospital, medical physician or service office, health care facility, poison control

---

<sup>32</sup> *Id.*

<sup>33</sup> Pub. L. No. 102-243 (1991).

<sup>34</sup> *Id.*

<sup>35</sup> *See* S. Rep. No. 102-178 (1991).

<sup>36</sup> 47 CFR § 64.1200. *See Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, Report and Order, 7 FCC Rcd 8752 (1992).

<sup>37</sup> *See Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, Report and Order, 68 FR 4414-01 (2003).

<sup>38</sup> *See* 47 U.S.C. § 227(b)(1)(A)(i); 47 CFR § 64.1200(a)(1)(i).

<sup>39</sup> *See* 47 U.S.C. §§ 227(b)(1)(A)(i), (iii); 47 CFR § 64.1200(a)(1)(iii).

<sup>40</sup> *See* 47 U.S.C. § 227(b)(1)(B); 47 CFR § 64.1200(a)(3).

<sup>41</sup> *See* 47 U.S.C. § 227(c)(3)(F); 47 CFR §§ 64.1200(c)(2), 64.1200(e).

center, or fire protection or law enforcement agency.”<sup>42</sup> Similarly, Section 227(b)(1)(A)(iii) of the Communications Act and Section 64.1200(a)(1)(iii) of the Rules prohibit such calls to cell phones and other mobile services, such as paging systems. It is unlawful “for any person . . . to make any call . . . using any automatic telephone dialing system or an artificial or prerecorded voice . . . to any telephone number assigned to a paging service, cellular telephone service, specialized mobile radio service, or other radio common carrier service, or any service for which the called party is charged for the call.”<sup>43</sup>

15. Two exceptions to these prohibitions are: (1) calls made for emergency purposes; and (2) calls made with the prior express consent of the called party.<sup>44</sup> Prior express written consent is required if the calls include advertisements or constitute telemarketing.<sup>45</sup> An advertisement is defined as “any material advertising the commercial availability or quality of any property, goods or services.”<sup>46</sup> Likewise, the rules define “telemarketing” as “the initiation of a telephone call or message for the purpose of encouraging the purchase . . . of property, goods, or services, which is transmitted to any person.”<sup>47</sup>

16. The Communications Act and the Rules also restrict prerecorded message calls to residential phone lines when the prerecorded message includes an advertisement or constitutes telemarketing.<sup>48</sup> Specifically, Section 64.1200(a)(3) of the Rules states that “[n]o person or entity may: . . . [i]nitiate any telephone call to any residential line using an artificial or prerecorded voice to deliver a message without the prior express *written* consent of the called party” unless one or more of four enumerated exceptions apply.<sup>49</sup>

17. Further, the Act and the Rules prohibit the initiation of telephone solicitations to telephone lines registered on the national Do-Not-Call registry without prior express *written* consent.<sup>50</sup> Specifically, Section 64.1200(c)(2) states that “[n]o person or entity shall initiate any telephone solicitation to residential telephone subscriber who has registered his or her telephone number on the national do-not-call registry of persons who do not wish to receive telephone solicitations.”<sup>51</sup> Section 64.1200(c)(2)(ii) states that any person or entity making such telephone solicitations will not be liable for violating Section 64.1200(c)(2) if it has obtained the subscriber's prior express written permission.<sup>52</sup>

---

<sup>42</sup> 47 U.S.C. § 227(b)(1)(A)(i); 47 CFR § 64.1200(a)(1)(i).

<sup>43</sup> 47 CFR § 64.1200(a)(1)(iii); 47 U.S.C. § 227(b)(1)(A)(iii).

<sup>44</sup> See 47 U.S.C. § 227(b)(1)(A)(iii); 47 CFR § 64.1200(a)(1)(iii).

<sup>45</sup> 47 CFR § 64.1200(a)(2)-(3). There are exceptions for calls made on behalf of tax-exempt nonprofit organizations or a call that delivers a “health care” message made by an entity identified in the HIPAA Privacy Rule. *Id.*

<sup>46</sup> 47 CFR § 64.1200(f)(1).

<sup>47</sup> 47 CFR § 64.1200(f)(12).

<sup>48</sup> Section 227(b)(1)(B) of the Communications Act prohibits any person “to initiate any telephone call to any residential telephone line using an artificial or prerecorded voice to deliver a message without the prior express consent of the called party unless the call is initiated for emergency purposes or is exempted by rule or order by the Commission. . . .” 47 U.S.C. § 227(b)(1)(B). The Commission set forth specific exemptions to the prohibition in its Rules.

<sup>49</sup> The exceptions are calls for emergency purposes, calls not made for a commercial purpose, calls made for a commercial purpose but do not include advertisements or telemarketing, and calls made for tax-exempt nonprofit organizations. 47 CFR § 64.1200(a)(3) (emphasis added).

<sup>50</sup> See 47 U.S.C. § 227(c)(3)(F); 47 CFR §§ 64.1200(c)(2), (e).

<sup>51</sup> See 47 CFR § 64.1200(c)(2). Section 64.1200(e) clarifies that “[t]he rules set forth in paragraph (c) and (d) . . . are applicable to any person or entity making telephone solicitations or telemarketing calls to wireless telephone numbers to the extent described in the Commission's Report and Order, CG Docket No. 02-278, FCC 03-153, ‘Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991.’” See 47 CFR § 64.1200(e).

<sup>52</sup> See 47 CFR § 64.1200(c)(2)(ii).

18. Calls to Emergency Telephone Lines. Spök contacted Commission staff about a robocalling incident affecting its services on December 15, 2016.<sup>53</sup> In its December informal complaint, the company reported a high volume of robocalls that adversely affected its paging network on December 14-15, 2016.<sup>54</sup> Spök's paging system constitutes an "emergency telephone line."<sup>55</sup> Spök represents that its paging system provides communications between and among physicians, nurses and patients.<sup>56</sup> According to Spök, medical professionals and first responders often rely on paging during emergencies because cellular networks can fail.<sup>57</sup> In *Abramovich*,<sup>58</sup> the Commission noted that Spök's paging system provides critical emergency communications to hospitals and physicians and other medical personnel.<sup>59</sup> The Commission previously acknowledged that paging services "are a critical part of emergency response" and that first responders, hospitals, and critical infrastructure providers "rely on paging services during emergencies."<sup>60</sup>

19. The calls made to Spök's paging system were prerecorded telemarketing calls in violation of the Act. The calls contained prerecorded messages soliciting consumers to purchase health care insurance.<sup>61</sup> The sale of health care insurance constitutes telemarketing requiring prior express written consent.<sup>62</sup> Because the numbers that were called belong to pagers used by medical personnel in hospitals (and were incapable of receiving voice calls), it stands to reason that the end user subscribers did not provide express written permission to receive these calls. Moreover, Spök itself complained that the robocalls made to phone numbers on its paging network were unauthorized when it alerted the Commission about the calls and requested assistance with stopping them. As previously mentioned, the related Roesel robocalling event adversely affected 5,000 to 10,000 of Spök's service subscribers.<sup>63</sup> We conclude, therefore, that Roesel made prerecorded telemarketing message calls to Spök's emergency paging system for a non-emergency purpose without prior express written consent in violation of Section 64.1200(a)(1)(i).

20. Calls to Wireless Telephone Lines. As part of the investigation, Bureau staff spoke with 44 wireless subscribers who received robocalls from Roesel on their wireless phones.<sup>64</sup> The individuals each confirmed that they (1) owned the telephone number at the time of the call, and (2) never consented to receive these calls. Thus, we conclude that Roesel made at least 44 prerecorded message calls to wireless numbers without prior express consent in violation of the Communications Act and the Rules. In addition, as noted previously, the Bureau identified that 17,487,293 of the 21,582,771 robocalls Roesel made from late October 2016 to late January 2017 were made to wireless phones.

---

<sup>53</sup> See *supra* note 6. As discussed above, Spök provides wireless paging systems for hospitals and medical personnel. See also Spök, *Paging Services*, <http://www.spok.com/solutions/paging-services> (last visited July 31, 2017).

<sup>54</sup> See *supra* note 6.

<sup>55</sup> See *Adrian Abramovich, Marketing Strategy Leaders, Inc., and Marketing Leaders, Inc.*, Citation and Order, DA 17-593, paras. 17 (June 22, 2017) (*Abramovich Citation*).

<sup>56</sup> Spök, *Paging Services*, <http://www.spok.com/solutions/paging-services> (last visited July 31, 2017).

<sup>57</sup> *Id.*

<sup>58</sup> See *Abramovich Citation* at paras. 17-18.

<sup>59</sup> *Id.*

<sup>60</sup> *Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks*, Order on Reconsideration, 22 FCC Rcd 18013, 18029, para. 34 (2007).

<sup>61</sup> See *supra* note 6.

<sup>62</sup> See 47 CFR § 64.1200(f)(11).

<sup>63</sup> See *supra* note 9.

<sup>64</sup> See *supra* note 24.



21. Calls to Residential Telephone Lines. Commission staff verified that at least 15 of the calls were to residential lines.<sup>65</sup> The calls involved healthcare insurance solicitations, and therefore constitute telemarketing calls and do not fall within one of the exceptions listed in Section 64.1200(a)(3). These 15 individuals confirmed that they (1) owned the number, and (2) did not consent to receive telemarketing calls. Thus, we find that Roesel violated the Act and the Rules by making at least 15 prerecorded message telemarketing calls to residential lines without prior express written consent.

22. Calls to Telephone Lines Registered on the National Do-Not-Call Registry. Commission staff verified that at least nine calls were made to telephone lines registered on the national Do-Not-Call registry at the time of the calls. The calls involved healthcare insurance solicitations, and therefore constitute telephone solicitations as described in Section 64.1200(c)(2) of the Rules. These nine individuals all filed complaints<sup>66</sup> in connection with Roesel's calls and confirmed that they did not provide prior express written consent to Roesel to make the calls to their lines.<sup>67</sup> Thus, we find that Roesel violated the Act and the Rules by making at least nine telephone solicitations to telephone lines without prior express written consent.

23. Finding of Violations. Based on the record developed in this case, the Commission finds that Roesel made one or more telephone solicitations with prerecorded messages in violation of Section 227 of the Communications Act and Section 64.1200 of the Rules.

24. Joint and Several Liability. The evidence indicates that Philip Roesel apparently acted directly, and under the BIC and WIQ names, to make the illegal robocalls at issue in this Citation. We find that Philip Roesel may be held personally liable under the principles of piercing the corporate veil. As the FCC has found in similar cases, personal liability is appropriate (and the Commission will pierce the corporate veil) where the individual, like Philip Roesel, is an officer of a closely held corporation and directly participates in, oversees, authorizes or otherwise directs the commission of the wrongful act. For example, in a recent case involving violations of the TCPA's prohibitions against unsolicited faxes, the Commission found that personal liability attached to the individual who served as his company's sole member and sole corporate officer.<sup>68</sup>

25. Similar to the facts of that case, in this case, the evidence shows that the "Best Insurance Contracts" entity merely functions as an instrumentality of Philip Roesel, and Philip Roesel cannot be allowed to circumvent personal liability simply by forming a corporate entity to hide behind.<sup>69</sup> There are

---

<sup>65</sup> *Id.* As noted above, 4,095,478 of the 21,528,771 robocalls reviewed by the Bureau were made to landline phones. However, the Bureau's review did not ascertain the percentage of these calls placed to residential lines.

<sup>66</sup> See Attachment A (Do-Not-Call Complaints).

<sup>67</sup> See Declarations of Nakasha Ramsey and Lisa Williford, June 19, 2017 (on file on File No. EB-TCD-16-00023195).

<sup>68</sup> See *Scott Malcolm, DSM Supply, LLC, Somaticare, LLC*, Notice of Apparent Liability for Forfeiture, 29 FCC Rcd 2476, 2483-84, paras. 16-19 (2014); *Scott Malcolm, DSM Supply, LLC, Somaticare, LLC*, Forfeiture Order, 31 FCC Rcd 1652, 1653, para. 5 (2016).

<sup>69</sup> See *Texas v. Am. Blastfax*, 164 F. Supp. 2d 892, 897-98 (W.D. Texas 2001) ("[I]f the officer directly participated in or authorized the statutory violation, even though acting on behalf of the corporation, he may be personally liable" for violations of the TCPA); see also *United States v. Pollution Servs. of Oswego, Inc.*, 763 F.2d 133, 134-35 (2d Cir. 1985) ("In light of the clear congressional intent to hold 'person[s]' liable for violations [of the Rivers and Harbors Appropriations Act], we see no reason to shield from civil liability those corporate officers who are personally involved in or directly responsible for statutorily proscribed activity."). Like in *Oswego*, the TCPA embodies the congressional intent to hold "persons" liable for violations. See 47 U.S.C. § 227(b)(1); see also 47 U.S.C. § 153(39) (defining a "person" to include individuals as well as corporate entities). In other contexts, courts have found the responsible corporate officer of a company to be personally liable for unlawful acts where the corporate officer was in a position of responsibility *vis-à-vis* the illegal conduct, had the power to prevent others from engaging in such conduct or to promptly correct the violation, and failed to take action. See e.g. *United States v. Hodges X-Ray, Inc.*, 759 F.2d 557, 560-62 (6th Cir. 1985).

a number of significant factors that illustrate why the corporate veil should be pierced in this case. Philip Roesel failed to maintain separate identities between BIC and himself.

26. According to the North Carolina Secretary of State, BIC was incorporated in September 2016.<sup>70</sup> In BIC's incorporation document, Philip Roesel is stated as the company's sole incorporator, the sole shareholder, and the sole registered agent.<sup>71</sup> BIC's mailing address, registered office, and principal office are each listed as [REDACTED], which—according to North Carolina property records—is a single family residence owned by Philip Roesel and members of his immediate family.<sup>72</sup> The BIC website lists Philip Roesel as the Founder and CEO of BIC;<sup>73</sup> but the company's website domain name, "bestinsurancecontracts.com," is registered to Philip Roesel personally, rather than Best Insurance Contracts, Inc.<sup>74</sup> BIC has been used for an illegal or wrongful purpose – making spoofed robocalls. Similarly, Philip Roesel uses BIC's telephone number for his personal insurance operation/dba name WIQ, and prominently features this phone number on the WIQ website. The robocalling operation used a third-party robocall platform provider called [REDACTED]. As noted previously, Philip Roesel set up the [REDACTED] account under which he conducted all of his robocalls in his own personal name and email address. As part of its investigation, the Bureau obtained billing records for the robocalls that Roesel made via the [REDACTED] platform. Those billing records show that Philip Roesel sometimes paid [REDACTED] with financial accounts in the name of BIC, while at other times the robocalling services were paid for using Philip Roesel's own financial accounts—indicating that he commingled his personal expenditures with those of BIC.<sup>75</sup> All of these factors strongly suggest that the corporate veil should be pierced and that Philip Roesel is personally liable for the apparently unlawful conduct. Thus, Best Insurance Contracts, Inc., and Philip Roesel, doing business as Wilmington Insurance Quotes are jointly and severally liable for the unlawful conduct described above.

#### IV. OPPORTUNITY TO RESPOND TO THIS CITATION

27. Roesel may respond to this Citation within 30 calendar days from the release date of this Citation by any of the following methods: (1) a written statement, (2) a teleconference interview, or (3) a personal interview at FCC Headquarters or the Commission Field Office nearest to Roesel's place of business. The Commission office nearest Philip Roesel is FCC Headquarters located in Washington, DC.

28. If Roesel requests a teleconference or personal interview, contact Kristi Thompson at (202) 418-1318. We note that such teleconference or interview must take place within 30 calendar days of the release date of this Citation. If Roesel prefers to submit a written response with supporting documentation, send the response within 30 calendar days of the release date of this Citation to the contact and address provided in paragraph below.

29. All written communications should be sent to the address below.

Kristi Thompson, Deputy Chief  
Telecommunications Consumers Division  
Enforcement Bureau  
Federal Communications Commission  
445 12th Street, SW, Rm. 4-C224

---

<sup>70</sup> See Best Insurance Contracts, Inc. Corporate Filing, North Carolina Secretary of State Website, <https://www.sosnc.gov/Search/profcorp/12410762> (last visited June 14, 2017).

<sup>71</sup> *Id.*

<sup>72</sup> *Id.*

<sup>73</sup> See Best Insurance Contracts Website, <https://bestinsurancecontracts.com/wp/> (last visited July 31, 2017).

<sup>74</sup> See GoDaddy.com WHOIS results, [www.bestinsurancecontracts.com](http://www.bestinsurancecontracts.com) (last visited June 27, 2017) (on file in EB-TCD-16-00023195).

<sup>75</sup> See [REDACTED] Response.

Washington, DC 20554

Re: **EB-TCD-16-00023195**

30. Upon request, the Commission will make reasonable accommodations for persons with disabilities. If applicable, Roesel should provide a description of the accommodation required, and include as much detail as possible, and also provide a telephone number and other contact information. Roesel should allow at least five business days advance notice; last minute requests will be accepted, but may be impossible to fill. Roesel should send an e-mail to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the FCC's Consumer & Governmental Affairs Bureau:

For sign language interpreters, CART, and other reasonable accommodations:  
202-418-0530 (voice), 202-418-0432 (tty);

For accessible format materials (braille, large print, electronic files, and audio format  
202-418-0531 (voice), 202-418-7365 (tty).

31. We advise Roesel that he is a violation of Section 1.17 of the Rules<sup>76</sup> for any person to make any false or misleading written or oral statement of fact to the Commission. Specifically, no person shall:

(1) In any written or oral statement of fact, intentionally provide material factual information that is incorrect or intentionally omit material information that is necessary to prevent any material factual statement that is made from being incorrect or misleading; and

(2) In any written statement of fact, provide material factual information that is incorrect or omit material information that is necessary to prevent any material factual statement that is made from being incorrect or misleading without a reasonable basis for believing that any such material factual statement is correct and not misleading.

32. Further, the knowing and willful making of any false statement, or the concealment of any material fact, in reply to this Citation is punishable by fine or imprisonment.<sup>77</sup>

33. Violations of Section 1.17 of the Rules or the criminal statute referenced above may result in further legal action, including monetary forfeitures pursuant to Section 503 of the Act.

34. Finally, we warn Roesel that, under the Privacy Act of 1974,<sup>78</sup> Commission staff will use all relevant material information before it, including information disclosed in interviews or written statements, to determine what, if any, enforcement action is required to ensure your compliance with the Act and Rules.

## V. FUTURE VIOLATIONS

35. If, after receipt of this Citation, Best Insurance Contracts, Inc., and/or Philip Roesel, doing business as Wilmington Insurance Quotes (or any entity through which Philip Roesel does business) again violates Section 227 of the Act, Sections 64.1200 of the Rules, the Commission may impose sanctions for each such violation. For example, the Commission may impose monetary

---

<sup>76</sup> 47 CFR § 1.17.

<sup>77</sup> 18 U.S.C. § 1001.

<sup>78</sup> 5 U.S.C. § 552a(e)(3).

forfeitures of up to \$19,246 per violation of Section 227.<sup>79</sup> Further, as discussed above, the Commission may assess forfeitures on both the conduct that led to this Citation and the conduct following it.<sup>80</sup>

**VI. ORDERING CLAUSE**

36. **IT IS ORDERED** that a copy of this Citation shall be sent by first class mail and certified mail, return receipt requested, to Best Insurance Contracts, Inc., and Philip Roesel, doing business as Wilmington Insurance Quotes, [REDACTED].

FEDERAL COMMUNICATIONS COMMISSION

Lisa S. Gelb  
Deputy Chief  
Enforcement Bureau

---

<sup>79</sup> 47 CFR § 1.80. *See Adjustment of Civil Monetary Penalties to Reflect Inflation*, Order, DA 16-1453, (Dec. 30, 2016).

<sup>80</sup> *See supra* para. 2.

ATTACHMENT A

Do-Not-Call Complaints

Printer Friendly Record Details

<https://www.consumersentinel.gov/Search/PrintDetails>

Record # 1 / 78740103 / Do Not Call Complaint			
Reference Number:	78740103	Is Phone in Registry?:	Yes
Complaint Date:	12/02/2016 9:07:27 AM	Product or Service:	National Do Not Call Registry
Complaint Source:	National Do Not Call Registry	Complaint Channel:	Internet
Transaction Date:	12/02/2016	Transaction Time:	9:06:00 AM
Existing Business Relationship?:	No	Pre-recorded message?:	Yes
Requested entity to stop calling?:	Yes		
Comments:	Subject matter of the call: Medical & prescriptions		
<b>Consumer</b>			
First Name:		Last Name:	Not Provided
Address 1:		Address 2:	
City:		State/Prov:	██████████
ZIP:		ZIP Extension:	
Phone Number:	██████████		
<b>Subject</b>			
Company Name:	Not Provided	Normalized Company Name:	Not Provided
State:	North Carolina		
Phone Number:	910-2118439		

Printer Friendly Record Details

<https://www.consumersentinel.gov/Search/PrintDetail:>

Record # 1 / 79396541 / Do Not Call Complaint	
Reference Number:	79396541
Complaint Date:	12/29/2016 3:06:59 PM
Complaint Source:	National Do Not Call Registry
Transaction Date:	12/29/2016
Existing Business Relationship?:	No
Requested entity to stop calling?:	No
Comments:	
<b>Consumer</b>	
First Name:	[REDACTED]
Address 1:	[REDACTED]
City:	[REDACTED]
ZIP:	[REDACTED]
Phone Number:	[REDACTED]
<b>Subject</b>	
Company Name:	Not Provided
State:	South Carolina
Phone Number:	803-2118439

Printer Friendly Record Details

<https://www.consumersentinel.gov/Search/PrintDetails>

Record # 3 / 79376071 / Do Not Call Complaint	
Reference Number:	79376071
Complaint Date:	12/28/2016 5:32:29 PM
Complaint Source:	National Do Not Call Registry
Transaction Date:	12/28/2016
Existing Business Relationship?:	No
Requested entity to stop calling?:	
Comments:	
Consumer	
First Name:	[REDACTED]
Address 1:	[REDACTED]
City:	[REDACTED]
ZIP:	[REDACTED]
Phone Number:	[REDACTED]
Subject	
Company Name:	Not Provided
Normalized Company Name:	Not Provided
State:	South Carolina
Phone Number:	803-2118439

Printer Friendly Record Details

<https://www.consumersentinel.gov/Search/PrintDetail>

Record # 7 / 79451793 / Do Not Call Complaint	
Reference Number:	79451793
Complaint Date:	01/02/2017 1:44:40 PM
Complaint Source:	National Do Not Call Registry
Transaction Date:	01/02/2017
Existing Business Relationship?:	No
Requested entity to stop calling?:	
Comments:	
<b>Consumer</b>	
First Name:	
Address 1:	
City:	
ZIP:	
Phone Number:	
<b>Subject</b>	
Company Name:	Not Provided
State:	South Carolina
Phone Number:	864-2118439
Is Phone in Registry?:	Yes
Product or Service:	National Do Not Call Registry
Complaint Channel:	Internet
Transaction Time:	1:38:00 PM
Pre-recorded message?:	Yes
Last Name:	Not Provided
Address 2:	
State/Prov:	
ZIP Extension:	
Normalized Company Name:	Not Provided



Printer Friendly Record Details

<https://www.consumersentinel.gov/Search/PrintDetail>

Record # 11 / 78037795 / Do Not Call Complaint	
Reference Number:	78037795
Complaint Date:	11/02/2016 3:02:41 PM
Complaint Source:	National Do Not Call Registry
Transaction Date:	11/02/2016
Existing Business Relationship?:	No
Requested entity to stop calling?:	No
Comments:	This was a robocall saying, " We are trying to help you get a cash benefit under Obamacare. " --- Subject matter of the call: Medical & prescriptions
<b>Consumer</b>	
First Name:	[REDACTED]
Address 1:	[REDACTED]
City:	[REDACTED]
ZIP:	[REDACTED]
Phone Number:	[REDACTED]
<b>Subject</b>	
Company Name:	Obamacare ( Otherwise Unknown)
Normalized Company Name:	Obamacare ( Otherwise Unknown)
State:	South Carolina
Phone Number:	864-2118439

Printer Friendly Record Details

<https://www.consumersentinel.gov/Search/PrintDetail>

Record # 6 / 78113840 / Do Not Call Complaint	
Reference Number: 78113840	Is Phone in Registry?: Yes
Complaint Date: 11/05/2016 2:39:35 PM	Product or Service: National Do Not Call Registry
Complaint Source: National Do Not Call Registry	Complaint Channel: internet
Transaction Date: 11/05/2016	Transaction Time: 2:37:00 PM
Existing Business Relationship?: No	Pre-recorded message?: Yes
Requested entity to stop calling?: No	
Comments: Subject matter of the call: signing up for obama care	
Consumer	
First Name:	Last Name: Not Provided
Address 1:	Address 2:
City:	State/Prov: [REDACTED]
ZIP:	ZIP Extension:
Phone Number: [REDACTED]	
Subject	
Company Name: Not Provided	Normalized Company Name: Not Provided
State: Florida	
Phone Number: 727-2118439	

Printer Friendly Record Details

<https://www.consumersentinel.gov/Search/PrintDetail>

Record # 13 / 78004362 / Do Not Call Complaint	
Reference Number: 78004362	Is Phone in Registry?: Yes
Complaint Date: 11/01/2016 2:02:51 PM	Product or Service: National Do Not Call Registry
Complaint Source: National Do Not Call Registry	Complaint Channel: Internet
Transaction Date: 11/01/2016	Transaction Time: 2:00:00 PM
Existing Business Relationship?: No	Pre-recorded message?: Yes
Requested entity to stop calling?: Yes	
Comments:	Recording said "Welcome to the Obamacare helpline we can help you reduce your health care costs" --- Subject matter of the call: Calls pretending to be government, businesses, or family and friends
<b>Consumer</b>	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2: [REDACTED]
City: [REDACTED]	State/Prov: [REDACTED]
ZIP: [REDACTED]	ZIP Extension: [REDACTED]
Phone Number: [REDACTED]	
<b>Subject</b>	
Company Name: Obamacare Help Line	Normalized Company Name: Obamacare Help Line
State: Florida	
Phone Number: 727-2118439	

Printer Friendly Record Details

<https://www.consumersentinel.gov/Search/PrintDetail>

Record # 4 / 78494026 / Do Not Call Complaint			
Reference Number:	78494026	Is Phone in Registry?:	Yes
Complaint Date:	11/21/2016 5:32:51 PM	Product or Service:	National Do Not Call Registry
Complaint Source:	National Do Not Call Registry	Complaint Channel:	Internet
Transaction Date:	11/21/2016	Transaction Time:	4:29:00 AM
Existing Business Relationship?:	No	Pre-recorded message?:	No
Requested entity to stop calling?:	No		
Comments:	Subject matter of the call: Dropped call or no message		
Consumer			
First Name:		Last Name:	Not Provided
Address 1:		Address 2:	
City:		State/Prov:	██████
ZIP:		ZIP Extension:	
Phone Number:	██████████		
Subject			
Company Name:	Not Provided	Normalized Company Name:	Not Provided
State:	Texas		
Phone Number:	281-2118439		

Printer Friendly Record Details

<https://www.consumersentinel.gov/Search/PrintDetail>

Record # 3 / 79881169 / Do Not Call Complaint	
Reference Number: 79881169	Is Phone in Registry?: Yes
Complaint Date: 01/17/2017 9:29:48 AM	Product or Service: National Do Not Call Registry
Complaint Source: National Do Not Call Registry	Complaint Channel: Internet
Transaction Date: 01/16/2017	Transaction Time: 6:03:00 PM
Existing Business Relationship?: No	Pre-recorded message?: Yes
Requested entity to stop calling?: No	
Comments: This came in on my cell phone. Recording mentioned cash award and health insurance may be free under Obama care. Press something to see if you qualify.	
Consumer	
First Name: [REDACTED]	Last Name: [REDACTED]
Address 1: [REDACTED]	Address 2: [REDACTED]
City: [REDACTED]	State/Prov: [REDACTED]
ZIP: [REDACTED]	ZIP Extension: [REDACTED]
Phone Number: [REDACTED]	
Subject	
Company Name: Unknown	Normalized Company Name: Unknown
State: Florida	
Phone Number: 904-2118439	