Federal Communications Commission 45 L Street NE Washington, DC 20554

News Media Information 202-418-0500 Internet: <u>www.fcc.gov</u> TTY: 888-835-5322

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FCC ENFORCEMENT ADVISORY

FCC ENFORCEMENT BUREAU CLASSIFIES 'ROYAL TIGER' AS THE FIRST CONSUMER COMMUNICATIONS INFORMATION SERVICES THREAT (C-CIST 1)

Enforcement Bureau Warns Regulatory Agencies, Law Enforcement Partners, and Industry Stakeholders of Threat from 'Royal Tiger'

I. <u>C-CIST-1: Royal Tiger Overview</u>

The Federal Communications Commission (FCC or Commission)'s Enforcement Bureau (Bureau) has classified "Royal Tiger," a group of voice service providers and their managing personnel with multiple international connections, as a Consumer Communications Information Services Threat (C-CIST) due to its repeated origination and transmission of apparently unlawful robocalls related to the impersonation of government entities, banks, and utility companies. Royal Tiger thereby facilitated harmful and apparently unlawful calls targeting consumers in the U.S. and compromised consumer trust in the communications networks.

This Advisory serves to heighten awareness of Royal Tiger among regulatory agencies, law enforcement partners, and industry stakeholders to mitigate Royal Tiger's perpetration of consumer harm and to bolster industry Know Your Customer and Know Your Upstream Provider processes.

II. Royal Tiger's Profile & Known Associates:

Royal Tiger is comprised of a group of individuals and entities located in the United States, the United Kingdom, the United Arab Emirates, and India.

Individuals: Royal Tiger is led by an individual named Prince Jashvantlal Anand and his associate Kaushal Bhavsar.

- **Prince Jashvantlal Anand** has links to the United States, India, the United Arab Emirates, and the United Kingdom. Prince Jashvantlal Anand has used the alias "Frank Murphy," and has served as CEO and Director of Illum Telecommunication Limited and Member and CEO of PZ Telecommunication LLC.
- **Kaushal Bhavsar** has ties to India and the United States and has served as CEO of One Eye LLC and Director of Illum Telecommunication Limited.

Entities: Royal Tiger has established or associated itself with the following companies in the United States, the United Kingdom, and India.

- Royal Tiger's U.S-Based Providers:
 - o **Illum Telecommunication Limited** (Illum) is an interconnected Voice Over Internet Protocol (VoIP) business incorporated in New York on November 3, 2020. Prince

Jashvantlal Anand serves as CEO and Director of Illum. Kaushal Bhavsar also serves as a Director.

- Illum, along with PZ Telecommunication LLC, received a <u>cease and desist letter</u> from the Bureau on October 21, 2021, demanding that it cease originating apparently illegal robocall traffic.
- PZ Telecommunication LLC (PZ Telecom) is an interconnected VoIP limited liability company formed in California on June 21, 2019. 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.
 - PZ Telecom, along with Illum, received a <u>cease and desist letter</u> from the Bureau on October 21, 2021, demanding that it cease originating apparently illegal robocall traffic.
- One Eye LLC (One Eye) is an interconnected VoIP limited liability company registered in Delaware on September 2, 2021. Kaushal Bhavsar serves as the named CEO of One Eye.
 - On February 14, 2023, the Bureau issued a <u>cease and desist letter</u> to One Eye demanding it take steps to cease serving as a gateway provider for apparently illegal traffic. On April 3, 2023, the Bureau followed that letter with an <u>Initial Determination Order</u>, and on May 11, 2023, issued a <u>Final Determination Order</u> requiring downstream providers to block One Eye's traffic.
 - On August 23, 2022, the FTC issued a <u>letter</u> to One Eye demanding it cease routing and transmitting apparently illegal robocall traffic.
 - In November 2022, after One Eye failed to respond to a Civil Investigative Demand (CID) and to a subsequent warning letter, the Office of the Indiana Attorney General filed a <u>petition</u> in the Marion County Superior Court to enforce the CID. In February 2023, the court granted the petition and, in May 2023, the court <u>ordered</u> sanctions against One Eye.
- Royal Tiger's Associated United Kingdom-Based Entities:
 - o **PZ Telecommunications (UK) LTD** (PZ UK) was a British company incorporated in England and Wales, United Kingdom, on May 12, 2020. PZ UK dissolved on October 19, 2021. Prince Jashvantlal Anand served as Director and Secretary of PZ UK.
 - O UK Tell Ltd. (UK Tell) is a British company which registered in England and Wales, United Kingdom, on October 25, 2019. 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. Prince Jashvantlal Anand served as a Director of UK Tell from May 24, 2023, to December 27, 2023.
 - Opulix Digital Limited (Opulix UK) is a British company incorporated in England and Wales, United Kingdom, on January 24, 2024. Prince Jashvantlal Anand is listed as Director and Secretary on UK corporate filings. Opulix UK purportedly offers business and domestic software development, web portals, advertising services, and information technology consultancy activities.

- Royal Tiger's Associated India-Based Entities:
 - Illum Telecommunication Private Limited (Illum India) was registered in Ahmedabad, Gujarat, India, on January 11, 2018. Prince Jashvantlal Anand and Kaushal Bhavsar serve as Directors of Illum India.
 - Opulix Digital Private Limited (Opulix India) is an Indian company registered in Ahmedabad, Gujarat, India, on April 9, 2023. Prince Jashvantlal Anand and Kaushal Bhavsar serve as Directors of Opulix India.

Clients: The Bureau identified the following as clients of Royal Tiger's U.S.-based voice service providers. These entities initiated apparently illegal traffic that was transmitted through or originated on Royal Tiger's networks, as set forth in the Bureau's <u>cease and desist letter</u> to Illum and PZ Telecom and the <u>cease and desist letter</u> to One Eye. We list the entities below to aid industry stakeholders in connection with Know Your Customer processes:

- Mavtel Voip
- Clevertel
- Edoro Technologies
- O2Serves
- Spinning Mantra Communications Pvt. Ltd.
- Cyber Futuristics Pvt. Ltd.
- Iqbri Telecom Pvt. Ltd.
- Globalite Collaboration Pvt. Ltd.
- RD INFOTECH
- AARV Services Pvt. Ltd.
- Coequence
- Go4Customer/CyFuture
- SAGA
- Max Solutions
- LINTECH SOLUTIONS

III. Royal Tiger's Conduct and Methods of Operation

Many of the suspected illegal calls transiting or originating through Royal Tiger included calls impersonating government agencies, banks, and utilities. Other calls pertained to purported credit card interest rate reduction offers and fictitious purchase authorization orders. These calls were apparently delivered without consent from the consumer, which is contrary to the Telephone Consumer Protection Act and/or Commission rules for robocalls to wireless telephone numbers or that introduce an advertisement or constitute telemarketing.

The principal individual behind Royal Tiger, Prince Jashvantlal Anand, operated under the cover of at least three U.S.-based business entities: PZ Telecom, Illum, and One Eye. Once the Bureau identified one entity as the source of apparently unlawful traffic, a new entity emerged. The individuals behind these entities have sought to evade accountability by shifting their operations to new companies and continuing with their apparently unlawful operations. By tracking personnel, customers, and other operational characteristics, as well as sharing information with regulatory counterparts and law enforcement partners, the Bureau was able to limit Royal Tiger's ability to operate in the shadows.

IV. <u>History of Enforcement Actions Against Royal Tiger Entities:</u>

The Bureau has issued numerous warnings and orders against the Royal Tiger entities, including the following:

- Oct. 21, 2021 Cease and Desist Letter to PZ Telecom and Illum
- Feb. 15, 2023 Notice of Suspected Illegal Robocall Traffic to One Eye
- Apr. 3, 2023 Initial Determination Order against One Eye
- May 11, 2023 Final Determination Order against One Eye

The Federal Trade Commission and the Office of the Indiana Attorney General, on behalf of the Anti-Robocall Multistate Litigation Task Force, have also taken action against Royal Tiger, including the following:

- Aug. 23, 2022 FTC Cease and Desist Letter to One Eye
- Nov. 1, 2022 Indiana Petition to Enforce Civil Investigative Demand against One Eye
- May 31, 2023 Indiana Order for Sanctions against One Eye

V. Reporting Suspected Violations

If you suspect such violations by individuals or entities associated with Royal Tiger, please inform the Commission by sending an email to CCIST@fcc.gov. Additionally, consumers may file an informal complaint with the Commission by telephone at 1-888-CALL-FCC (1-888-225-5322), ASL Videophone at 1-844-432-2275, or the online Consumer Complaint Portal. Submissions may also be mailed to the below address:

Federal Communications Commission Consumer and Governmental Affairs Bureau Consumer Inquiries and Complaints Division 45 L Street NE Washington, DC 20554

Private entities seeking to report suspected violations, including those that suspect they are being targeted by Royal Tiger or suspect Royal Tiger is impersonating them or spoofing their business phone number, may submit information via the Commission's Private Entity Portal, in addition to the methods described above.