



April 19, 2018

Ms. Marlene H. Dortch
Federal Communications
Commission 445 12th St. SW,
Room TW-B204
Washington, DC 20554

Re: Teledirek Global Corporation, File No. ITC-214-20120801-00193

Dear Ms. Dortch:

The Department of Homeland Security (“DHS”) with the concurrence of the Department of Justice (“DOJ”), (collectively, the “Agencies”), hereby requests that the Federal Communications Commission (“FCC”) terminate, declare null and void and no longer in effect file number ITC-214-20120801-00193 granted to Teledirek Global Corporation (“Teledirek”) on March 13, 2014, and the corresponding Letter of Assurance (“LOA”) dated March 3, 2014, because Teledirek is no longer in business.

Prior to Teledirek receiving the aforementioned authorization, the Agencies requested the FCC condition Teledirek’s authorization on the requirement that Teledirek abide by the commitments and undertakings contained in the 2014 LOA to DHS and DOJ.

The Agencies have sought to confirm Teledirek’s compliance with the commitments contained in the LOA for several years. On December 16, 2014, DHS contacted Teledirek’s counsel, Edward Maldonado, to remind the company that it had failed to comply with the terms of the LOA by not submitting for approval the proposed third party auditor, due in May 2014. After receiving no response to this email, DHS emailed Mr. Maldonado again on January 12, 2015 with the same request. Mr. Maldonado responded on January 27th that he would provide the proposed auditor within the next 2 business days; however, DHS received no response. DHS followed up with Mr. Maldonado on February 12th and again on February 23rd. On April 20, 2015, DHS again contacted Mr. Maldonado to remind him that the company still had not submitted a proposed auditor and that the audit was to have been completed within a year of the date of execution of the LOA, March 3, 2015. After multiple phone call attempts by then-DHS Foreign Investment Risk Management Assistant Director, Richard Hagar, Mr. Hagar spoke with Mr. Maldonado the week of June 8, 2015. Following

this conversation, on June 12th, Mr. Maldonado submitted Teledirek's proposed auditor. On September 21st and 28th and October 29, 2015, DHS emailed Mr. Maldonado and requested that the company provide documentation demonstrating the proposed auditor's GAAP auditing experience, which was not otherwise readily available. DHS received no response. On July 10, 2017, DHS sent a final email requesting the documentation but still received no response.

On February 6, 2018, the FCC informed DHS that Teledirek was no longer an operating entity. Consistent with FCC request, on March 14, 2018, DHS sent certified letters to Mr. Maldonado and Paul Mentor, the point of contact provided with the original application, requesting that the company provide: a current point of contact; a list of services currently offered; and background information on the proposed auditor. The letters were sent to 3 addresses provided to DHS by the FCC: 1) 5801 West Hallandale Beach Blvd., Hallandale, FL 33023; 2) 2024 Hollywood Blvd., Hollywood, FL 33020; and 3) 815 Ponce de Leon Blvd. Suite 304, Coral Gables, FL 33134. Mr. Maldonado received and signed for one of the letters on March 15th, while the other two were unclaimed and returned to sender. DHS has received no response.

In light of these developments, the Agencies request the FCC terminate, declare null and void and no longer in effect the international Section 214 authorization issued to Teledirek, file number ITC-214-20120801-00193, and the corresponding LOA.

Should you have any questions whatsoever, please do not hesitate to contact me.

Sincerely,

/S/

Phil Ludvigson

Director, Foreign Investment Risk Management

Office of Policy

U.S. Department of Homeland Security

cc: Denise Coca
Chief, Policy Division
International Bureau, FCC
Denise.coca@fcc.gov

David Krech
Associate Chief, Policy Division
International Bureau, FCC
David.krech@fcc.gov

Loyaan Egal
National Security Division
U.S. Department of Justice
Loyaan.egal@usdoj.gov