



Federal Communications Commission  
Washington, D.C. 20554

August 29, 2018

Mr. Paul Ruddy Mentor  
Teledirek Global Corp.  
5801 West Hallandale Beach Blvd.  
Hallandale, FL 33023  
[ruddy@teledirekllc.com](mailto:ruddy@teledirekllc.com)

***CERTIFIED MAIL – RETURN RECEIPT REQUESTED***

**Re: Potential Termination of International Section 214 Authorization,  
File No. ITC-214-20120801-00193**

Dear Mr. Mentor:

We are forwarding for your response the attached letter submitted on April 19, 2018 by the Department of Homeland Security (DHS) with the concurrence of the Department of Justice (DOJ) (collectively, “the Executive Branch Agencies”).<sup>1</sup> The Executive Branch Agencies request that the Federal Communications Commission (Commission) terminate, declare null and void and no longer in effect Teledirek Global Corporation’s (Teledirek) international Section 214 authorization granted on March 13, 2014 and the corresponding March 3, 2014 Letter of Assurance (LOA), a condition of Teledirek’s international Section 214 authorization.<sup>2</sup> The Executive Branch Agencies make this request because they believe Teledirek is no longer in business.<sup>3</sup>

After receiving an international Section 214 authorization, as required by Section 63.21(a) of the Commission’s rules, a carrier “is responsible for the continuing accuracy of the certifications made in its application” and must promptly correct information no longer accurate, “and in any event, within thirty (30) days.”<sup>4</sup> Teledirek has failed to inform the Commission of any changes in its business status of

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<sup>1</sup> Letter from Phil Ludvigson, Director, Foreign Investment Risk Management, Office of Policy, U.S. Department of Homeland Security to Marlene H. Dortch, Secretary, FCC (April 19, 2018) (DHS Letter).

<sup>2</sup> *Id.* at 1; FCC, International Bureau, *International Authorizations Granted*, Report No. TEL 01662, Public Notice, 29 FCC Rcd 2930 (IB 2014); Letter from Paul Mentor, CEO, Teledirek Global Corp. to David Heyman, Assistant Secretary for Policy, Office of Policy, U.S. Department of Homeland Security and John Carlin, Acting Assistant Attorney General, National Security Division, U.S. Department of Justice (March 3, 2014).

<sup>3</sup> DHS Letter at 1-2 (indicating the unsuccessful efforts by the DHS to ensure compliance with the LOA since 2014). In 2017, DHS emailed Teledirek’s counsel, Mr. Maldonado by requiring documentation of a third-party auditor’s GAAP auditing experience and received no response. On March 14, 2018, Executive Branch agencies sent letters to last known addresses. Mr. Maldonado received and signed for one of the letters on March 15, 2018 but did not respond back to the Executive Branch Agencies. The other letters were returned to sender. *Id.* at 2. On August 27, 2018, Mr. Maldonado notified the Commission that he has not served as legal counsel for Teledirek since February 13, 2014. Mr. Maldonado also stated that he attempted to contact Teledirek prior to notifying the Commission he no longer represents the company but was unsuccessful and Teledirek Global Corp. was administratively dissolved according to the Florida Department of State’s Division of Corporations at [www.sunbiz.org](http://www.sunbiz.org). Letter from Edward Maldonado, Attorney, The Law Office of Edward Maldonado, PA to the International Bureau, FCC (Aug. 27, 2018).

<sup>4</sup> 47 CFR § 63.21(a).

providing international telecommunications services, as required by Section 63.21(a) of the Commission's rules.<sup>5</sup>

Additionally, as a part of its authorization, Teledirek was required to file annual international telecommunications traffic and revenue reports, as required by Section 43.62 of the Commission's rules, which was in effect until April 2018.<sup>6</sup> Specifically, Section 43.62(b) of the Commission's rules states that "[n]ot later than July 31 of each year, each person or entity that holds an authorization pursuant to section 214 to provide international telecommunications service shall report *whether* it provided international telecommunications services during the preceding calendar year."<sup>7</sup> Based on a review of our records, Teledirek did not submit traffic and revenue reports indicating whether or not it provided services for the 2014 and 2015 reporting periods and may be in violation of Section 43.62 of the Commission's rules.<sup>8</sup>

We require that you respond to the Executive Branch Agencies' allegations and possible violations of the Commission's rules within 30 days from the date of this letter, by **September 28, 2018**. In your response, please describe any steps that you are taking or will take with the Executive Branch Agencies to resolve their concerns. If Teledirek is no longer in business, changed its name, or is no longer providing services under its international Section 214 authorization and does not intend to do so in the future, please indicate whether Teledirek is surrendering its authorization. Finally, Teledirek must adhere to the Commission's rules designed to ensure its ability to communicate with the authorization holder and verify if Teledirek is still providing service. Failure to do so may also warrant termination, wholly apart from Teledirek's non-compliance with the condition of its international Section 214 authorization.

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<sup>5</sup> *Id.* In addition, there is no indication that Teledirek is currently providing service pursuant to its international Section 214 authorization. If Teledirek has discontinued service, it may also be in violation of the Commission's rules requiring prior notification for such discontinuance. 47 CFR § 63.19.

<sup>6</sup> 47 CFR § 43.62(b). In 2013, the Commission adopted Section 43.62(b) of its rules, which went into effect on February 11, 2015. *Reporting Requirements for U.S. Providers of International Telecommunications Services; Amendment of Part 43 of the Commission Rules*, IB Docket No. 04-112, Second Report and Order, 28 FCC Rcd 575 (2013); *Reporting Requirements for U.S. Providers of International Telecommunications Services*, 80 Fed. Reg. 7547 (Feb. 11, 2015). On October 24, 2017, the Commission eliminated the annual traffic and revenue reporting requirement. *Section 43.62 Reporting Requirements for U.S. Providers of International Services; 2016 Biennial Review of Telecommunications Regulations*, IB Docket Nos. 17-55 and 16-131, Report and Order, 32 FCC Rcd 8115, 8119, paras. 8-23 (2017); *Section 43.62 Reporting Requirements for U.S. Providers of International Services; 2016 Biennial Review of Telecommunications Regulations* 83 Fed. Reg. 17931 (April 25, 2018).

<sup>7</sup> 47 CFR § 43.62(b).

<sup>8</sup> FCC, International Bureau, 2014 U.S. International Telecommunications Traffic and Revenue Data (IB July 2016), [https://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2016/db0701/DOC-340121A3.pdf](https://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0701/DOC-340121A3.pdf); FCC, International Bureau, Section 43.62 Online Filing (June 28, 2016), <https://www.fcc.gov/general/section-4362-online-filing>.

A failure to respond to this letter will be deemed as an admission of the facts alleged by the Executive Branch Agencies and the Commission and will result in the issuance of an order terminating Teledirek's international Section 214 authorization.

Sincerely,



Denise Coca  
Division Chief  
Telecommunications & Analysis Division  
International Bureau

Enclosure: DHS Letter

cc: Mr. Paul Ruddy Mentor  
Teledirek Global Corp.  
2024 Hollywood Blvd.  
Hollywood, FL 33020

Spiegel & Utrera, P.A.  
1840 SW 22<sup>nd</sup> St., 4<sup>th</sup> Floor  
Miami, FL 33145



**Homeland  
Security**

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 27<sup>th</sup> 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 12<sup>th</sup> and again on February 23<sup>rd</sup>. 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 12<sup>th</sup>, Mr. Maldonado submitted Teledirek's proposed auditor. On September 21<sup>st</sup> and 28<sup>th</sup> 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 15<sup>th</sup>, 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](mailto:Denise.coca@fcc.gov)

David Krech  
Associate Chief, Policy Division  
International Bureau, FCC  
[David.krech@fcc.gov](mailto:David.krech@fcc.gov)

Loyaan Egal  
National Security Division  
U.S. Department of Justice  
[Loyaan.egal@usdoj.gov](mailto:Loyaan.egal@usdoj.gov)