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STATE OF VERMONT
OFFICE OF THE ATTORNEY GENERAL
109 STATE STREET
MONTPELIER, VT
05609-1001

February 9, 2022

Eli Karabell
Karabell Industries, LLC
4147 West Pine Blvd, Suite 3
Saint Louis, MO 63108

Re: Cease and Desist Violations of the Telephone Consumer Protection Act; Vermont Telephone Solicitations Act, and/or the Vermont Consumer Protection Act

You are receiving this letter because we have received complaints about your company soliciting Vermonters multiple times day and night – at least some of whom are on the federal “Do Not Call” registry. Such calls violate the Telephone Consumer Protection Act (“TCPA”), the Federal Trade Commission’s “Do Not Call” Rule, and the Vermont Telephone Solicitations Act, as well as the Consumer Protection Act as unfair and/or deceptive acts in commerce and must cease immediately.¹

The Office of the Vermont Attorney General directs you to immediately cease and desist from any/all activities that represent violations of the TCPA, FTC Rules, the Vermont Telephone Solicitations Act and the Vermont Consumer Protection Act, including but not limited to:

- Making repeated unwanted, unsolicited telemarketing calls, or text messages by an unregistered entity;
- Making repeated unwanted, unsolicited telemarketing calls or text messages to call recipients on the federal “Do Not Call” registry;
- Any other violation of federal or state law arising from unfair or deceptive conduct.

Please do not hesitate to contact our offices at the numbers above if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Curtis", written over a white background.

Christopher J. Curtis
Chief, Public Protection Division
Office of the Attorney General

¹ See, e.g., 47 U.S.C. § 227; 9 V.S.A. § 2464a (“No person shall make any telephone call to a telephone number in Vermont that violates the Federal Trade Commission’s Do Not Call Rule, 16 C.F.R. subdivision 310.4(b)(1)(iii), or the Federal Communication Commission’s Do Not Call Rule, 47 C.F.R. subdivision 64.1200(c)(2) and subsection (d), as amended from time to time.”); and 9 V.S.A. § 2453.