

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Richard M. Zelma

Plaintiff

Vs.

**Michael Peter Halperin, (“Halperin”)
Individually, as owner, manager,
founder and director of HFA Holdings
LLP., d/b/a, IP Horizon Inc.,**

and;

**Michael Peter Halperin, d/b/a HFA
Holdings LLP. (“HFA”), a/k/a, d/b/a, IP
Horizon Inc., SkyeTel, Call48,
MHLHTH Holdings LLC., and all of
Halperins currently unknown shell
companies**

and;

**DOE Telemarketers (1-20), ABC
Corporations’ (1-20), Resellers, Call-
Centers, working with, benefiting
from, participating in, affiliated or
doing business with the named
Defendants’; (Hereinafter “the
Halperin Defs’.), each acting
individually, in concert or as a group.**

Defendants’

CIVIL ACTION NO. 2:24-cv-01059 -ES-JRA

Removed from the Superior Court of
New Jersey Law Division, Bergen County;

Original Docket No. BER-L- 5354-23

**PLAINTIFF’S
DECLARATION/CERTIFICATION
AND NOTICE TO THE COURT OF
ADDITIONAL PROHIBITED CALLS,
RECENTLY RECEIVED FROM
PHONE NUMBERS BELONGING TO
THE WITHIN DEFENDANTS**

February 22, 2025

VIA ECF ELECTRONIC FILING

Chambers of The Honorable Esther Salas, U.S.D.J.

Chambers of The Honorable José R. Almonte, U.S.M.J.

The District Court of New Jersey, Newark

Newark, NJ 07102

PLAINTIFF'S DECLARATION AND NOTICE TO THE COURT

I, Richard M. Zelma, Plaintiff *pro se*, hereby declare the following under penalty of perjury:

1. On February 19, 2025, I received several calls from [201] 591-0847, on my second line ending in 8154.
2. I answered the first call and heard a prerecorded announcement about a free \$100 gift card.
3. This type of telemarketing call has been around for about 10 years and is designed to bait the call recipient into providing the caller with their mailing address and credit card number, which is later charged for various unknown products.
4. The prerecorded announcement required that I press "1" to continue. Being familiar with the scam and not interested, I hung up.
5. After the first call, I received a series of immediate, repetitive calls from the same number, a pattern meeting the description of a "one-ring" phone scam.
6. I answered a second time and after listening to the same announcement as before, I pressed "1" and was connected to a live agent.
7. The agent was female, with a heavy Philippine, barely understandable accent, who attempted to obtain my credit card information under the guise of a free gift card offer from Prime Perks, a nonexistent entity.
8. After that agent was asked but provided false identity information, I hung up the call and immediately called the number back. A recorded announcement

greeted my call with the same sales pitch as the previous incoming calls, indicating the calling number was active, in service, not spoofed and assigned to an unknown entity.

9. My caller ID information also indicated I had a voice message from that same number and when retrieved, only the phone number was disclosed, but no message, confirming the “one-ring” phone scam.

10. Following my due diligence in identifying as much information about the calls as possible, using various resources, I found that Defendant IP Horizon was identified as the carrier and owner of the target (calling) phone number; [201] 591-0847.

This recent activity is relevant to my ongoing case against IP Horizon, as it suggests a pattern of conduct that continues to violate the TCPA and the notice sent, March 17, 2023 to the defendants from the Federal Trade Commission. (Plt. FAC, EX-3)

I have documented these calls and am prepared to provide further details when necessary.

Respectfully submitted,
/s/ Richard M. Zelma
Richard M. Zelma, *Pro Se*
940 Blanch Avenue
Norwood, New Jersey 07648
Tel. No: 201 767 8153
EMAIL: TCPALAWRZ@gmail.com

Dated: February 22, 2025

CERTIFICATION

I, Richard M. Zelma, Plaintiff *pro se* in the above entitled matter, says as follows:

I am over the age of eighteen, and otherwise competent to be a witness in this matter.

I have reviewed all relevant law, rules and regulations, material and relevant to the within matter.

All statements by me relating to conversations or discussions with “others” regarding the subject matter of this case are true and accurate to the best of my understanding and declare under penalty of perjury that the foregoing is true and correct.

/s/ Richard M. Zelma

Dated: February 22, 2025

CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2025, I electronically filed the foregoing Declaration and Certification using the Court’s Electronic Filing System, which will automatically generate a Notice of Electronic Filing to all parties in the case who are registered users of the CM/ECF System, which includes the Defendants.

/s/ Richard M. Zelma

Dated: February 22, 2025