

**STATE OF CONNECTICUT  
BEFORE THE COMMISSIONER OF CONSUMER PROTECTION**

**CIVIL INVESTIGATIVE DEMAND**

**TO: AT&T, Inc.**  
**208 S. Akard St.**  
**Dallas, TX 75202**

**BY AUTHORITY OF THE STATE OF CONNECTICUT**, and more particularly, pursuant to the Connecticut Unfair Trade Practices Act ("CUTPA"), Chapter 735a of the Connecticut General Statutes, and the authority granted the Commissioner of Consumer Protection for the State of Connecticut by section 42-110d of the Connecticut General Statutes, **AT&T, Inc.** ("Respondent"), is hereby commanded to present to the Commissioner, UNDER OATH, by delivering to the Office of the Connecticut Attorney General, Consumer Protection Section, 165 Capitol Avenue, Hartford, Connecticut, 06106, c/o Joseph Gasser, joseph.gasser@ct.gov, on or before **5:00 in the afternoon of August 29, 2025**, answers to interrogatories and Documentary material in connection with an investigation into business practices regarding unauthorized charges, assessments, features, or services on consumer accounts and other practices which may constitute unfair or deceptive acts or practices in violation of CUTPA. The Respondent is notified not to destroy, discard, alter in any manner, or transfer from its possession, any Documentary material requested or identified in any of the Respondent's responses to the interrogatories and Document requests herein.

## **I. DEFINITIONS**

This Civil Investigative Demand, Order to Produce, and Order to Compel Testimony ("CID," collectively) shall be read and interpreted in accordance with the definitions set forth below:

- A. "All" means all or any, and "Any" means all or any.
- B. "And," "All," or "Or" shall be construed either conjunctively or disjunctively to bring within the scope of the request any information that might otherwise be construed to be outside its scope.
- C. "Communication" means all meetings, conversations, conferences, discussions, correspondence, emails, text messages, messages, telegrams, telefaxes, mailgrams, and all oral, electronic, and written expressions or other occurrences whereby thoughts, opinions or data are transmitted between two or more individuals.
- D. "Concern" and "Concerning" shall mean Relating To, referring to describing, evidencing, or constituting.
- E. "Consumer" shall mean and include any person, a natural person, individual, governmental agency or entity, partnership, corporation, trust, estate, incorporated or unincorporated association, and any other legal or commercial entity however organized.
- F. "Contact" means any form of communication.
- G. "Custodian" shall mean the person(s) who is/are most knowledgeable about the information and Documents requested herein, including:
  - 1. The location and method of record keeping for the Documents responsive to this Request; and

2. The organization of the Documents as they are produced to the Commissioner pursuant to this Request.
3. Respondent's process for identifying Documents responsive to this Request.  
The person(s) shall have the ability to authenticate and identify each Document provided by You pursuant to the standard found in Fed. R. Evid. 902(11).

H. "Describe" or "Description" means to state with specificity all facts, including but not limited to time, comprising, or pertaining to such fact, thing, condition, action, or event, and to identify all individuals involved in such fact, thing, action, or event.

K. "Documentary Material" or "Document" shall mean all written or graphic matter or electronically stored information ("ESI"), whether in final or draft form, however produced, or reproduced, of every kind and description in your actual or constructive possession, custody, care or control, including without limitation, all writings, communications, text messages and e-mails, account documents, calendars or planners, charts, reports, diaries, drafts, drawings, faxes, graphs, travel records, memoranda, minutes, notes, papers, photographs, receipts, reports, statements, statistical records, studies, presentations, time sheets or logs, vouchers, weigh tickets, working papers, or any other tangible thing.

L. This CID is intended to cover Documents and ESI in every form or source in which such Documents or ESI exists or in which you possess it, including without limitation computer or electronic files stored on file servers, e-mail servers, work stations, desktops, hard drives, smartphones, tablets, and other mobile electronic devices, or other electronic social or industrial/business web-based media (e.g., Gmail, OneDrive, Facebook, X/Twitter, LinkedIn) within your control, including personal devices that you have used at any time for work; records,

data, reports, and queries derived from or residing in applications and databases, data compilations from which information can be derived, converted or translated into reasonably usable form, magnetic discs, magnetic strips, magnetic tape, recognition characters, microfiche, microfilm, optical characters, punched cards, punched paper tapes, audio tapes or recordings, or video tapes or recordings. Documents and ESI are in your “constructive possession, custody, care or control” if they reside physically or digitally on your premises, and also if they reside at the facilities of or on the servers or other devices of third parties such as “cloud” providers, Document storage facilities, back up sites, and other entities with whom you contract to maintain or house your Documents and ESI.

M. “Entity” means without limitation any corporation, company, limited liability company or corporation, partnership, limited partnership, association, or other firm or similar body, or any unit, division, agency, department, or similar subdivision thereof.

N. "Identify" means to set forth specific and detailed information, including, in the case of:

1. a communication, its date, type (e.g., telephone conversation or discussion), the place where it occurred, the identity of the person who made the communication, the identity of the person who received the communication, the identity of each other person when it was made, and the subject matter discussed (for e-mail, this information should be supplied in the metadata);
2. a natural person, his or her name, business address, employer, and title or position;

3. a person other than a natural person (such as, for example, a firm, association, organization, business, partnership, trust, corporation, or public entity), its name, the address of its principal place of business, as well as, if it has a person other than a natural person that ultimately controls it, that other person's name and the address of that person's principal place of business;
4. a Document, the title of the Document, the author, the title or position of the author, the addressee, each recipient, the type of Document, the subject matter, the date of preparation, and its number of pages.
- O. "Including" means including but not limited to.
- P. "Person" includes a natural person as well as any firm, association, organization, business, partnership, trust, corporation, or public entity.
- Q. "Refer" shall mean to make a statement about, embody, discuss, describe, reflect, identify, deal with, consist of, establish, comprise, list, or in any way pertain, in whole or in part, to the subject of the Document request.
- R. "Relating To" or "In Relation To" means Relating to, Referring to, concerning, describing, pertaining to, evidencing, reflecting, regarding, constituting, involving, or touching upon in any way. Each of these terms may be used interchangeably herein and will be treated as encompassing all these meanings.
- S. "Respondent" means AT&T, Inc. and any of its affiliates, parents, subsidiaries, or divisions.
- T. "You," "Your," or "Your Business" means Respondent.

U. The singular includes the plural and vice versa, and a verb tense includes all other tenses where the clear meaning is not distorted by the addition of another tense or tenses.

## II. INSTRUCTIONS

The response to this CID shall be submitted in the following manner:

A. *Except where otherwise expressly indicated, this CID covers the period from January 1, 2020, through the present (the "Relevant Period").* Any interrogatory or request for production of Documents framed in the present tense shall be construed to cover the entire Relevant Period or any part of it.

B. This is a continuing request for information. If, after making its initial response, Respondent obtains, discovers, formulates, or otherwise becomes aware of any further information that is responsive to any one or more of these interrogatories or Document requests, Respondent is required to supplement its response(s) and furnish such information as soon as such information becomes available.

C. For the purposes of reading, interpreting, or construing the scope of the interrogatories and Document requests, the terms used shall be given their most expansive and inclusive interpretation.

D. Unless instructed otherwise, each interrogatory and Document request shall be construed independently and not by reference to any other interrogatory or Document request for the purpose of limitation.

E. Documents provided shall be complete and, unless privileged, shall be un-redacted, produced as maintained in the ordinary course of business in the company's files (*e.g.*, Documents that in their original condition were stapled, clipped or otherwise fastened together or

maintained in separate file folders shall be produced in such form; attachments produced following the parent e-mail). You may submit photocopies (with color photocopies where necessary to interpret the Document), in lieu of original Documents, provided that such copies are true, correct, and complete copies of the original Documents.

F. Documents should be produced as they are maintained in the normal course of business and should be labeled or organized in accordance with the requests to which they are responsive.

G. Each page of each Document submitted shall contain a unique identifying number that also contains a uniform alphabetic prefix identifying You. All boxes, folders or media containing submitted Documents and ESI shall be marked with Your name and the name(s) of the person(s) whose files are contained in that box or folder.

H. Before producing any Documents, you must contact the undersigned counsel to arrange a meeting or conference call with the company's personnel who are familiar with the particular ESI and the applications in which it is stored, to explain to OAG representatives the manner in which the ESI is stored, and the types of information that are available in the application. OAG representatives must approve the format and production method for ESI in advance. If responsive ESI resides in databases or applications, the company representative must be prepared to discuss queries or reports that can be run in order to furnish the responsive ESI. Electronic productions must be scanned for and free of viruses. The OAG will return any infected media for replacement, which may affect the timing of the Company's compliance with this Demand.

I. Each document should be produced only once. If you plan to produce Documents and ESI that were previously produced, the current production must be de-duplicated. Please

supply an index detailing the Document ID or Bates number for the current production along with every other Document ID or Bates number assigned to all Documents in relation to other productions. Produce deposition, proceeding, and trial transcripts in condensed or minuscule form, with a word index, and electronically on CD or DVD. The electronic version of the transcripts should be in Live notes PTF (Portable Transcript Format), PCF (Portable Case Format), or Plain Text format.

J. If You are unable to answer or respond fully to any interrogatory or Document request, after exercising due diligence to secure information necessary to answer or respond to the fullest extent possible: (a) answer or respond to the extent possible, (b) specify the reason for Your inability to answer or respond in full, and (c) set forth the efforts You made to obtain the requested information.

K. Your Document retention policy should be suspended to prevent the destruction of any Documents that may be relevant to the Department of Consumer Protection's investigation as described in this CID.

L. Documents to be produced include all Documents in Your possession, custody, or control, wherever located, including Documents in the possession, custody or control of Your directors, officers, employees, representatives, or agents. Without limitation on the term "control," a Document is deemed to be in Your control if You have the right to secure that Document or a copy thereof from another person.

M. If You cannot supply precise information, state Your best estimate or approximation (including Your best approximation of date by reference to other events, when necessary), and designate the response as an estimate or approximation.



N. If You contend that any interrogatory or Document demanded by this CID is privileged in whole or in part, file with Your response to this CID a statement in writing and under oath and in such statement: (1) identify each such interrogatory or Document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a Document, then in addition to the statement required herein, produce a copy of such Document from which the alleged privileged portion has been redacted, describing the redacted portion and basis for the redaction.

## **REQUESTS FOR INFORMATION AND DOCUMENTS**

In accordance with the requirements set forth in the “Definitions” and “Instructions,” You are specifically required to respond to the following within the time frame set forth above:

### **(1) Identification of Responder**

- (a) Identify the Person(s) answering and/or assisting in answering this Request on Your behalf.
- (b) Identify the individual(s) with the authority, and best ability to, answer questions regarding the subject matter of this Request.

### **(2) Connecticut Operations**

- (a) Identify All physical addresses, post office boxes, telephone numbers, web addresses and email addresses from which You conduct business or have conducted business in Connecticut.
- (b) Identify All addresses and telephone numbers for All locations from which You conduct business in Connecticut.
- (c) Identify all authorized AT&T retailers in the State of Connecticut, along with the date(s) that such retailers have been authorized to offer or sell Your goods and services.
- (d) Produce copies of all franchise agreements, licensing agreements, or other similar Documents by which You authorize retailers to offer Your goods and services, between You and All authorized AT&T retailers in the State of Connecticut. If the substance of such agreements is identical, only one exemplar agreement need be produced.

### **(3) Business Practices**

- (a) Explain in detail, and produce Documents sufficient to demonstrate, any efforts made by You to prevent unauthorized charges, assessments, features, or services being added to AT&T accounts, Including any requirement that a consumer input a PIN or password before changes to an account are made.
- (b) Explain in detail, and produce Documents sufficient to demonstrate, the policies and procedures You follow when a consumer reports an unauthorized charge, assessment, feature, or service on their AT&T account.
- (c) Produce all versions of the AT&T Sales Compensation Plan Policy in effect during the Relevant Period.

- (d) To the extent not provided in response to the foregoing requests, explain in detail, And produce Documents sufficient to show, any policy, procedure, or plan outlining any commissions or incentives You offer to salespersons Related To offering or selling Your goods or services.
- (e) Explain in detail, and produce Documents sufficient to demonstrate, the policies and procedures You follow when a consumer reports an unauthorized charge, assessment, feature, or service on their AT&T account.
- (f) Explain in detail, and produce Documents sufficient to demonstrate, the policies and procedures You follow, And instruct Your authorized retailers to follow, when applying credit to AT&T accounts for consumers' traded electronic devices, specifically Including measures You take to ensure credits are accurately applied based on the value of consumers' traded devices.

**(4) Katie Barnaby**

- (a) Produce All Documents concerning the circumstances of the termination of employment of one Katie Barnaby, d.o.b. 11/4/1989 ("Katie Barnaby") in or around July 2022.
- (b) Produce all Documents Relating To an AT&T Asset Protection Investigation Relating to Katie Barnaby in connection with, inter alia, unauthorized charges, assessments, features, or services on AT&T accounts.
- (c) To the extent not provided in response to the above requests, produce all Documents Relating To Your responses to any investigation or request by the Connecticut State Police or any Connecticut local police department concerning Katie Barnaby in connection with, inter alia, unauthorized charges, assessments, features, or services on AT&T accounts.

**(5) Complaints**

- (a) Produce all Documents Relating to Complaints from Connecticut Consumers concerning unauthorized charges, assessments, features, or services on AT&T accounts and the response(s) to and resolution(s), if any, of such Complaints.
- (b) Produce all Documents Relating to Complaints from Connecticut Consumers concerning inaccurate credit applied to AT&T accounts in connection with trade-in of devices and the response(s) to and resolution(s), if any, of such Complaints.

**(6) Other Proceedings**

- (c) Produce all Documents Relating To Your responses to any law enforcement investigation, whether civil or criminal, And any civil, administrative, or regulatory

complaint, action, or proceeding Related to unauthorized charges, assessments, features, or services on AT&T accounts or inaccurate credit applied to AT&T accounts in connection with trade-in of devices.

HEREOF FAIL NOT UNDER PENALTY OF LAW.

Dated at Hartford, Connecticut, this 24th day of July, 2025



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BRYAN CAFFERELLI  
COMMISSIONER OF CONSUMER PROTECTION

**STATE OF CONNECTICUT  
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INVESTIGATIVE DEMAND**

**OATH**

Personally appeared, \_\_\_\_\_, who, being duly sworn deposes and says that the answers to the Interrogatories and Document requests attached hereto and contained in the Investigative Demand issued to **AT&T, Inc.** are accurate to the best of my knowledge and belief.

\_\_\_\_\_  
Name:

Title:

Subscribed and sworn to me this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
Notary Public/ Commissioner of Superior Court