

**INFORMATION**

JD-CR-71 Rev. 3-11

 STATE OF CONNECTICUT  
**SUPERIOR COURT**

Disposition date

Police Case number

CFS#2500017377

Agency name

EDMC-C

Agency number

CSP-400

**Title, Allegation and Counts**

State of Connecticut vs. (Name of accused)

Barnaby, Katie

Residence (Town) of accused

Stafford

Docket number

Address

64 West Street, Apt. A

Date of birth

11/04/1989

 The undersigned Prosecuting  
 Authority of the Superior Court  
 of the State of Connecticut  
 charges that:

To be held at (Town)

Rockville

 Geographical  
 area  
 number

19

Court date

Count One — Did commit the offense of:

Computer Crimes Third Degree

Continued to

Purpose

Reason

At (Town) On or about (Date)

Rockville

Dec 2023-Jan 2025

In violation of General Statute number

53a-254

Count Two — Did commit the offense of:

At (Town)

On or about (Date)

In violation of General Statute number

Count Three — Did commit the offense of:

At (Town)

On or about (Date)

In violation of General Statute number

☐ See other sheet for additional counts

Date

6-18-25

Signed (Prosecuting Authority)

**Court Action**

Defendant advised of rights before plea

(Judge)

(Date)

Bond

Surety

☐ 10 %

Election

(Date)

☐ Attorney

☐ Public defender

Guardian

☐ Cash

☐ CT

☐ JY

Bond change

Seized property inventory number

Count	Plea date	Plea	Plea withdrawn		Verdict finding	Fine	Remit	Additional disposition
			Date	New plea				
1						\$	\$	
2						\$	\$	
3						\$	\$	

Date	Other Court Action	Judge

Receipt number	Cost <input type="checkbox"/> IMP <input type="checkbox"/> NCI	Bond information <input type="checkbox"/> Bond forfeited <input type="checkbox"/> Forfeiture vacated <input type="checkbox"/> Forfeiture vacated and bond reinstated
Application fee - receipt number if paid	Circle one W I Q	Program fee - receipt number if paid
Prosecutor on original disposition	Reporter/monitor on original disposition	Signed (Clerk)
		Signed (Judge)

**INFORMATION**

JD-CR-71 Rev. 3-11

STATE OF CONNECTICUT  
**SUPERIOR COURT**

Disposition date

Police Case number

CFS#2500017377

Agency name

EDMC-C

Agency number

CSP-400

**Arrest Warrant**

Geographical  
area  
number

19

State of Connecticut vs. Barnaby, Katie

To: Any Proper Officer of the State of Connecticut

By Authority of the State of Connecticut, you are hereby commanded to arrest the body of the within-named accused. ("X" all that apply)

☐ A. Accused is ordered to be brought before a clerk or assistant clerk of the Superior Court.

☐ B. Accused is not entitled to bail.

If A, B or both are checked above, you shall without undue delay bring the arrested person before the clerk or assistant clerk of the Superior Court for the geographical area where the offense is alleged to have been committed, or if the clerk's office is not open, to a community correctional center within said geographical area, or the nearest community correctional center if no such center exists in the geographical area, or to the Correctional Institution, as the case may be.

☐ C. Bail set at \_\_\_\_\_

☐ D. Non-financial conditions of release:

Extradition boundaries  
established by prosecutor

☒ E. Conditions of release not determined by court.

By the Court

Signed (Judge of the Superior Court)

Date

Name of Judge (Print or type)

6-27-25

Richard Rubino

**Return On Arrest Warrant**

Geographical  
area  
number

19

Town of

TOLLAND

Date

7/10/25

State of Connecticut

Then and there, by virtue of the within and foregoing complaint and warrant, I arrested the body of the within-named accused and read the same in the hearing of said accused; and have said accused here in court for examination.

Attest (Officer's signature and Department)

[Signature]

# 621

Date

Other Court action

Judge

**ARREST WARRANT APPLICATION**JD-CR-64b Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3**STATE OF CONNECTICUT  
SUPERIOR COURT**  
www.jud.ct.gov

For Court Use Only

Supporting Affidavits sealed

☐ Yes ☐ No

Police Case number <b>CFS#2500017377</b>	Agency name <b>EDMC-C</b>	Agency number <b>CSP-400</b>
Name (Last, First, Middle Initial) <b>Barnaby, Katie</b>	Residence (Town) of accused <b>Stafford</b>	Court to be held at (Town) <b>Rockville</b>
		Geographical Area number <b>19</b>

**Application For Arrest Warrant**

To: A Judge of the Superior Court

The undersigned hereby applies for a warrant for the arrest of the above-named accused on the basis of the facts set forth in the: ☒ Affidavit Below. ☐ Affidavit(s) Attached.

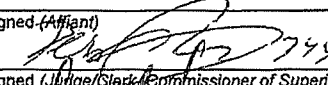
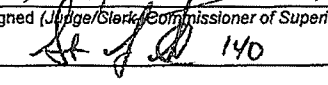
Date <b>6-18-25</b>	Signed (Prosecuting authority) 	Type/print name of prosecuting authority <b>Jonathan Shew</b>
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**Affidavit**

The undersigned affiant, being duly sworn, deposes and says:

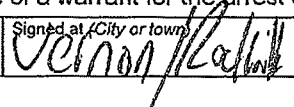
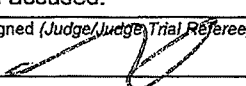
1. The undersigned Affiant, Detective Matthew Hogan #344, being duly sworn, does depose and state that he is a regular sworn member of the Connecticut Department of Emergency Services and Public Protection, Division of State Police, and has been a member of the said department since June 1, 2012. This Affiant presently holds the rank of Detective and is presently assigned to the Eastern District Major Crime Squad, Criminal Investigation Unit, at Troop C in Tolland, Connecticut, who is also duly sworn Special Deputation assigned to the Connecticut Financial Crimes Task Force, United States Secret Service. At all times mentioned herein, the Affiant was acting as an official member of said department. Affiant Hogan has received formal training regarding laws of arrest and laws pertaining to search and seizure from the Connecticut State Police Academy, the Connecticut Municipal Police Officer Standards and Training Council, and has been accredited as a Certified Anti-Money Laundering Specialist by the Associated of Certified Anti-Money Laundering Specialists (ACAMS), Certified Economic Crime Forensic Examiner (CECFE) by the National White Collar Crime Center. The following facts and circumstances are stated from personal knowledge, observation, and investigation, as well as the information received from fellow Troopers/ Police Officers acting in their official capacity, and from official police reports. The knowledge of the facts and circumstances contained hereinafter are the result of the affiant's personal investigative efforts and observations as well as those of other law enforcement officers, acting in their official capacity, who related their findings to this affiant.

(This is page 1 of a 7 page Affidavit.)

Date <b>5/27/25</b>	Signed (Affiant) 
Jurat <b>5/27/25</b>	Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public) 

**Finding**

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and Signature 	Signed at (City or town) <b>Rockville</b>	On (Date) <b>6-22-25</b>	Signed (Judge/Judge Trial Referee) 	Name of Judge/Judge Trial Referee <b>Richard Russo</b>
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**ARREST WARRANT APPLICATION**JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3**STATE OF CONNECTICUT  
SUPERIOR COURT**


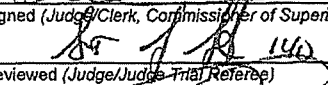
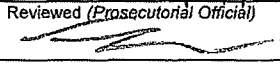
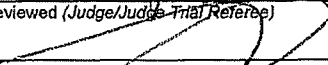
www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

**Affidavit - Continued**

2. That, I make this affidavit in support of an application for a criminal complaint and a warrant to arrest Katie Barnaby (DOB: 11/04/1989) based on evidence obtained in the investigation conducted by the Connecticut State Police Eastern District Major Crime Squad.
3. That, based on the facts set forth below, this Affiant submits that there is probable cause to believe, that Katie Barnaby (DOB: 11/04/1989) knowingly accessed AT&T's computer systems with intent to modify customer account data by adding protection plans, additional lines, and manipulating rate plans without customer consent or business justification. These unauthorized system accesses and data modifications resulted in financial harm to customers. Barnaby knowingly exceeded her authorized access to modify customer account data for personal gain through commission manipulation.
4. That, on 02/27/24, Eastern District Major Crime detectives were assigned to investigate a fraud scheme involving former AT&T employee, Katie Barnaby. In December of 2021, at an AT&T retailer in Stafford, Barnaby allegedly misled a customer by secretly adding unauthorized phone and tablet lines to their account for commission, resulting in approximately \$2,000 in unauthorized charges over a 26-month period. The investigation revealed multiple victims at other AT&T locations. Barnaby was arrested on the strength of an arrest warrant on 01/03/25 and charged with Computer Crimes Third Degree (53a-254) for CFS #2400078263.
5. That, AT&T utilizes two distinct retail distribution models to serve customers: corporate-owned stores and authorized retailers. These different business arrangements have significant implications for consumer experiences, pricing structures, employee incentives, and accountability mechanisms.

(This is page 2 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)		
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)		
Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date	
	6-18-25		6-27-25	

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

AT&T corporate stores are wholly owned and operated by AT&T Inc. directly. These locations represent the company's official retail presence, with employees who work directly for AT&T as corporate staff members. In contrast, authorized retailers like [REDACTED] (where Barnaby worked) and [REDACTED] are independent businesses that operate under licensing agreements with AT&T. These retailers are essentially franchises or third-party partners that have contracted with AT&T to sell its products and services under the AT&T brand name. While they display AT&T signage and branding that appears nearly identical to corporate locations, they are separately owned businesses.

6. That, upon the press release for Barnaby's arrest under CFS 2400078263, Troop C - Tolland began receiving numerous complaints involving Barnaby. The following is a list of victims, and the AT&T store associated:

- a) 25-17196 [REDACTED] - Stafford AT&T
- b) 25-17372 [REDACTED] - Willimantic AT&T
- c) 25-17198 [REDACTED] - Colchester AT&T
- d) 25-31860 [REDACTED] - Stafford AT&T
- e) 25-17376 [REDACTED] - Stafford AT&T
- f) 25-17377 [REDACTED] - Willimantic AT&T

7. That, on 03/28/25, Affiant Hogan #344 and Det. Picard #712 had a series of search and seizure warrants for the above victims AT&T account records approved by GA19 Rockville Superior Court Judge McNamara. These documents were sent to AT&T's legal department and a response with records was returned on or about 04/16/25.

(This is page 3 of a 7 page Affidavit.)

Date 5/27/25		Signed (Affiant) Det. Picard #712	
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) Det. Picard #712	
Reviewed (Prosecutorial Official) [Signature]	Date 6-18-25	Reviewed (Judge/Judge Trial Referee) [Signature]	Date 6-27-25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT  
www.jud.ct.gov

Name (Last, First, Middle Initial) Barnaby, Katie	Residence (Town) of accused Stafford	Court to be held at (Town) Rockville	Geographical Area number 19
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## Affidavit - Continued

8. That, the following is a summary of the above victim account records and victim statement in order:

- f. [REDACTED] Barnaby accessed AT&T's computer systems on December 23, 2023, to add an unauthorized line [REDACTED] with a financed iPhone 15 Pro Max to [REDACTED] account. AT&T records confirm this device was added without authorization during [REDACTED] legitimate store visit to upgrade family devices. System notes from January 18, 2025, explicitly document that "the customer is disputing the Next Installment Agreement on the line ending in [REDACTED] and "the customer states that she doesn't recognize the CTN/Device and is claiming Fraud." The records show Barnaby manipulated computer data to avoid a required \$282.84 payoff on another line. System logs confirm activity by a representative with user ID [REDACTED] (Barnaby) accessing and modifying the account.

9. That, along with numerous victim complaint reports to Troop C, there were current and former AT&T employees e-mailing and calling to provide their accounts from around the United States. On or about 01/22/25, Affiant Hogan was contacted by [REDACTED] a prior [REDACTED] AT&T employee based in Michigan who alleged fraud was common practice at [REDACTED] (AT&T authorized retailer). [REDACTED] agreed to provide a sworn written statement to Michigan State Police D/Sgt. Brian Siemen #295 to assist with our investigation. The following is a summary of pertinent facts:

*Former AT&T retail employee [REDACTED] provided testimony to Michigan State Police on January 22, 2025, that corroborates the systematic nature of the fraudulent practices observed in the Connecticut investigation. [REDACTED] stated that during his two-month employment at an AT&T authorized retailer from October to December 2024, he was explicitly instructed by multiple managers to add unauthorized services to customer*

(This is page 4 of a 7 page Affidavit.)

Date 5/27/25	Signed (Affiant) Det. [Signature] 349		
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public) [Signature] 140	
Reviewed (Prosecutorial Official) [Signature]	Date 6-18-25	Reviewed (Judge/Judge Trial Referee) [Signature]	Date 6-27-25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

*accounts without knowledge or consent.*

According to [REDACTED] store managers directed employees to add three specific services -- Turbo (\$7), Next Up (\$10-\$14), and insurance (\$14-\$17) --to every customer's account and every phone line, even for customers who merely entered the store to make payments. Management justified this practice by explaining that if customers noticed and complained, the charges would simply be credited back while the employee still received the commission. [REDACTED] further testified that when customers discovered these unauthorized additions and returned to the store to have them removed, employees were instructed to falsely claim they couldn't remove the services and to direct customers to call customer service after 48 hours, despite having the ability to remove them immediately. This delay tactic was designed to ensure the services remained on accounts long enough to qualify for commission metrics.

[REDACTED] identified that this practice was driven by AT&T's commission structure, which rewarded employees with bonuses ranging from \$300 to \$3,000 monthly for achieving a 90% close rate on these services. His testimony specifically cited an incident involving a customer named Adam who explicitly declined the Next Up service multiple times, but had added it to his account anyway at management's insistence, which ultimately led to [REDACTED] resignation on December 9, 2024. (This witness statement provides relevant context demonstrating that the fraudulent practices identified in the Connecticut investigation may represent a broader pattern within AT&T's sales operations rather than isolated incidents.)

10. That, an examination of Barnaby's conduct at the AT&T retail locations reveals that between December 2021 and December 2023, Barnaby engaged in systematic misuse of AT&T's computer systems, accessing and modifying customer account data without proper authorization from the account holders.

(This is page 5 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature] 374
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature] 140
Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date
[Signature]	6-18-25	[Signature]	6-27-25

**ARREST WARRANT APPLICATION**JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3**STATE OF CONNECTICUT  
SUPERIOR COURT**

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

**Affidavit - Continued**

Barnaby utilized her legitimate system access credentials to make unauthorized modifications to customer accounts following the completion of initial authorized transactions. These modifications included adding unrequested protection plans, creating unauthorized service lines, altering device information, and adjusting rate plans within the AT&T database system. System logs and contemporaneous customer complaints confirm these changes were made without customer knowledge or consent.

Financial analysis of the affected accounts demonstrates that the total pecuniary impact across the documented victims substantially exceeds \$1,000. Account records for [REDACTED] indicate unauthorized charges approximating \$3,100, while [REDACTED] account reflects estimated fraudulent charges between \$4,680 and \$6,120 over the contract period. In the case of [REDACTED] unauthorized system modifications resulted in billing charges of \$1,539.84, representing nearly six times the originally quoted rate.

System logs document deliberate circumvention of security protocols, as evidenced in [REDACTED] account records: "Bypass use of 1-time PIN for AddAuthorizedUser because Initial PIN not received." AT&T's security systems independently identified these activities as potentially fraudulent, with one account noting "Order stopped due to Avertack Fraud alert."

There is a documented pattern of unauthorized computer access and data manipulation across multiple victim accounts over an extended period. The technical nature of these modifications required deliberate computer system access and specialized knowledge of AT&T's systems, with the apparent motivation of financial gain through commission manipulation.

11. That, based on the preceding facts, the Affiant believes there is sufficient probable cause

(This is page 6 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature] 344
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature]
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6-27-25



## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

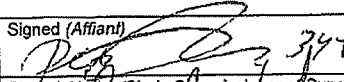
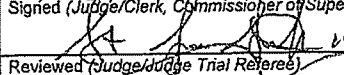
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Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

to issue an arrest warrant in the name of Katie Barnaby (DOB: 11/04/1989), last known address of 64 West Street, Apt. A, Stafford, CT, for violation of Connecticut General Statutes.

(This is page 7 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6-27-25

# INFORMATION

JD-CR-71 Rev. 3-11

## STATE OF CONNECTICUT SUPERIOR COURT

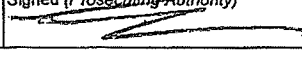
Disposition date

Police Case number  
CFS#2500017372

Agency name  
EDMC-C

Agency number  
CSP-400

## Title, Allegation and Counts

State of Connecticut vs. (Name of accused) <b>Barnaby, Katie</b>		Residence (Town) of accused <b>Stafford</b>	Docket number	
Address <b>64 West Street, Apt. A</b>		Date of birth <b>11/04/1989</b>	The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that:	
To be held at (Town) <b>Rockville</b>		Geographical area number <b>19</b>		
Count One — Did commit the offense of: <b>Computer Crimes Third Degree</b>			Continued to	Purpose
At (Town) <b>Rockville</b>	On or about (Date) <b>May 2023-Jan 2025</b>	In violation of General Statute number <b>53a-254</b>		
Count Two — Did commit the offense of:				
At (Town)	On or about (Date)	In violation of General Statute number		
Count Three — Did commit the offense of:				
At (Town)	On or about (Date)	In violation of General Statute number		
<input type="checkbox"/> See other sheet for additional counts			Date <b>6-20-25</b>	Signed (Prosecuting Authority) 

## Court Action

Defendant advised of rights before plea		Bond	Surety	<input type="checkbox"/> 10 %	Election (Date)
(Judge)	(Date)			<input type="checkbox"/> Cash	<input type="checkbox"/> CT <input type="checkbox"/> JY
<input type="checkbox"/> Attorney	<input type="checkbox"/> Public defender	Guardian	Bond change	Seized property inventory number	

Count	Plea date	Plea	Plea withdrawn		Verdict finding	Fine	Remit	Additional disposition
			Date	New plea				
1						\$	\$	
2						\$	\$	
3						\$	\$	

Date	Other Court Action	Judge

Receipt number	Cost <input type="checkbox"/> IMP <input type="checkbox"/> NCI	Bond information <input type="checkbox"/> Bond forfeited <input type="checkbox"/> Forfeiture vacated <input type="checkbox"/> Forfeiture vacated and bond reinstated
Application fee - receipt number if paid	Circle one W I Q	Program fee - receipt number if paid
Prosecutor on original disposition	Reporter/monitor on original disposition	Signed (Clerk)
		Signed (Judge)

**INFORMATION**

JD-CR-71 Rev. 3-11

**STATE OF CONNECTICUT  
SUPERIOR COURT**

Disposition date

Agency number

CSP-400

Police Case number  
CFS#2500017372

Agency name  
EDMC-C

**Arrest Warrant**

Geographical  
area  
number

19

State of Connecticut vs. Barnaby, Katie

To: Any Proper Officer of the State of Connecticut

By Authority of the State of Connecticut, you are hereby commanded to arrest the body of the within-named accused. ("X" all that apply)

- ☐ A. Accused is ordered to be brought before a clerk or assistant clerk of the Superior Court.
- ☐ B. Accused is not entitled to bail.

If A, B or both are checked above, you shall without undue delay bring the arrested person before the clerk or assistant clerk of the Superior Court for the geographical area where the offense is alleged to have been committed, or if the clerk's office is not open, to a community correctional center within said geographical area, or the nearest community correctional center if no such center exists in the geographical area, or to the Correctional Institution, as the case may be.

- ☐ C. Bail set at \_\_\_\_\_
- ☐ D. Non-financial conditions of release:

Extradition boundaries  
established by prosecutor

- ☒ E. Conditions of release not determined by court.

By the Court

Signed (Judge of the Superior Court)

Date

Name of Judge (Print or type)

6/27/25 Richard Rubin

**Return On Arrest Warrant**

Geographical  
area  
number

19

Town of

Tollard

Date

07/10/25

State of Connecticut

Then and there, by virtue of the within and foregoing complaint and warrant, I arrested the body of the within-named accused and read the same in the hearing of said accused; and have said accused here in court for examination.

Attest (Officer's signature and Department)

Cooper # 631

Date

Other Court action

Judge

**ARREST WARRANT APPLICATION**JD-CR-64b Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3**STATE OF CONNECTICUT  
SUPERIOR COURT**  
www.jud.ct.gov

For Court Use Only	
Supporting Affidavits sealed	
<input type="checkbox"/> Yes	<input type="checkbox"/> No

Police Case number <b>CFS#2500017372</b>	Agency name <b>EDMC-C</b>	Agency number <b>CSP-400</b>
Name (Last, First, Middle Initial) <b>Barnaby, Katie</b>	Residence (Town) of accused <b>Stafford</b>	Court to be held at (Town) <b>Rockville</b>
		Geographical Area number <b>19</b>

**Application For Arrest Warrant**

To: A Judge of the Superior Court

The undersigned hereby applies for a warrant for the arrest of the above-named accused on the basis of the facts set forth in the: ☒ Affidavit Below. ☐ Affidavit(s) Attached.

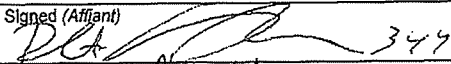
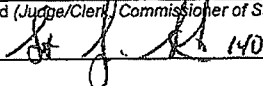
Date <b>6-20-25</b>	Signed (Prosecuting authority) 	Type/print name of prosecuting authority <b>Jonathan Shaw</b>
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**Affidavit**

The undersigned affiant, being duly sworn, deposes and says:

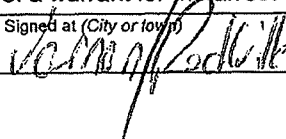
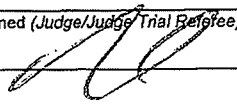
1. The undersigned Affiant, Detective Matthew Hogan #344, being duly sworn, does depose and state that he is a regular sworn member of the Connecticut Department of Emergency Services and Public Protection, Division of State Police, and has been a member of the said department since June 1, 2012. This Affiant presently holds the rank of Detective and is presently assigned to the Eastern District Major Crime Squad, Criminal Investigation Unit, at Troop C in Tolland, Connecticut, who is also duly sworn Special Deputation assigned to the Connecticut Financial Crimes Task Force, United States Secret Service. At all times mentioned herein, the Affiant was acting as an official member of said department. Affiant Hogan has received formal training regarding laws of arrest and laws pertaining to search and seizure from the Connecticut State Police Academy, the Connecticut Municipal Police Officer Standards and Training Council, and has been accredited as a Certified Anti-Money Laundering Specialist by the Associated of Certified Anti-Money Laundering Specialists (ACAMS), Certified Economic Crime Forensic Examiner (CECFE) by the National White Collar Crime Center. The following facts and circumstances are stated from personal knowledge, observation, and investigation, as well as the information received from fellow Troopers/ Police Officers acting in their official capacity, and from official police reports. The knowledge of the facts and circumstances contained hereinafter are the result of the affiant's personal investigative efforts and observations as well as those of other law enforcement officers, acting in their official capacity, who related their findings to this affiant.

(This is page 1 of a 7 page Affidavit.)

Date <b>5/27/25</b>	Signed (Affiant) 
Jurat Subscribed and sworn to before me on (Date) <b>5/27/25</b>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) 

**Finding**

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and Signature 	Signed at (City or town) <b>Rockville</b>	On (Date) <b>6/27/25</b>	Signed (Judge/Judge Trial Referee) 	Name of Judge/Judge Trial Referee <b>Richard P. Sino</b>
---	--	-----------------------------	---	---

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial) Barnaby, Katie	Residence (Town) of accused Stafford	Court to be held at (Town) Rockville	Geographical Area number 19
--	---	---	--------------------------------

## Affidavit - Continued

2. That, I make this affidavit in support of an application for a criminal complaint and a warrant to arrest Katie Barnaby (DOB: 11/04/1989) based on evidence obtained in the investigation conducted by the Connecticut State Police Eastern District Major Crime Squad.
3. That, based on the facts set forth below, this Affiant submits that there is probable cause to believe, that Katie Barnaby (DOB: 11/04/1989) knowingly accessed AT&T's computer systems with intent to modify customer account data by adding protection plans, additional lines, and manipulating rate plans without customer consent or business justification. These unauthorized system accesses and data modifications resulted in financial harm to customers. Barnaby knowingly exceeded her authorized access to modify customer account data for personal gain through commission manipulation.
4. That, on 02/27/24, Eastern District Major Crime detectives were assigned to investigate a fraud scheme involving former AT&T employee, Katie Barnaby. In December of 2021, at an AT&T retailer in Stafford, Barnaby allegedly misled a customer by secretly adding unauthorized phone and tablet lines to their account for commission, resulting in approximately \$2,000 in unauthorized charges over a 26-month period. The investigation revealed multiple victims at other AT&T locations. Barnaby was arrested on the strength of an arrest warrant on 01/03/25 and charged with Computer Crimes Third Degree (53a-254) for CFS #2400078263.
5. That, AT&T utilizes two distinct retail distribution models to serve customers: corporate-owned stores and authorized retailers. These different business arrangements have significant implications for consumer experiences, pricing structures, employee incentives, and accountability mechanisms.

(This is page 2 of a 7 page Affidavit.)

Date 5/27/25	Signed (Affiant) <i>[Signature]</i> 344		
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <i>[Signature]</i> 140	
Reviewed (Prosecutorial Official) <i>[Signature]</i>	Date 6-10-25 20	Reviewed (Judge/Judge Trial Referee) <i>[Signature]</i>	Date 6/27/25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

AT&T corporate stores are wholly owned and operated by AT&T Inc. directly. These locations represent the company's official retail presence, with employees who work directly for AT&T as corporate staff members. In contrast, authorized retailers like [REDACTED] (where Barnaby worked) and [REDACTED] are independent businesses that operate under licensing agreements with AT&T. These retailers are essentially franchises or third-party partners that have contracted with AT&T to sell its products and services under the AT&T brand name. While they display AT&T signage and branding that appears nearly identical to corporate locations, they are separately owned businesses.

6. That, upon the press release for Barnaby's arrest under CFS 2400078263, Troop C - Tolland began receiving numerous complaints involving Barnaby. The following is a list of victims, and the AT&T store associated:

- a) 25-17196 [REDACTED] - Stafford AT&T
- b) 25-17372 [REDACTED] - Willimantic AT&T
- c) 25-17198 [REDACTED] - Colchester AT&T
- d) 25-31860 [REDACTED] - Stafford AT&T
- e) 25-17376 [REDACTED] - Stafford AT&T
- f) 25-17377 [REDACTED] - Willimantic AT&T

7. That, on 03/28/25, Affiant Hogan #344 and Det. Picard #712 had a series of search and seizure warrants for the above victims AT&T account records approved by GA19 Rockville Superior Court Judge McNamara. These documents were sent to AT&T's legal department and a response with records was returned on or about 04/16/25.

(This is page 3 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature] 344
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature]
Reviewed (Prosecutorial Official)	Date 6.20.25	Reviewed (Judge/Judge Trial Referee)	Date 6-27-25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

8. That, the following is a summary of the above victim account records and victim statements in order:

b. [REDACTED] Barnaby accessed AT&T's computer systems on May 17-18, 2023, to add unauthorized features to [REDACTED] account, including an AT&T Next Up feature at \$6.00 monthly without consent. More significantly, Barnaby manipulated the trade-in device information in the system, substituting a red iPhone 12 (IMEI [REDACTED]) for [REDACTED] silver iPhone 12 Pro (IMEI [REDACTED]), resulting in a reduced trade-in value of \$700 instead of the promised \$1,000. AT&T records from May 31, 2023, contain case notes [REDACTED] explicitly confirming this device discrepancy. January 2025 records show the account was flagged for fraud investigation, noting: "Customer advised me she is not disputing the upgrade but claims the trade in device was switched at the POS." Barnaby's unauthorized manipulation of computer system data to substitute a different device and add unauthorized features.

9. That, along with numerous victim complaint reports to Troop C, there were current and former AT&T employees e-mailing and calling to provide their accounts from around the United States. On or about 01/22/25, Affiant Hogan was contacted by [REDACTED] a prior [REDACTED] AT&T employee based in Michigan who alleged fraud was common practice at [REDACTED] (AT&T authorized retailer). Badder agreed to provide a sworn written statement to Michigan State Police D/Sgt. Brian Siemen #295 to assist with our investigation. The following is a summary of pertinent facts:

*Former AT&T retail employee [REDACTED] provided testimony to Michigan State Police on January 22, 2025, that corroborates the systematic nature of the fraudulent practices observed in the Connecticut investigation. [REDACTED] stated that during his two-month employment at an AT&T authorized retailer from October to December 2024, he was*

(This is page 4 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature]
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature]
Reviewed (Prosecutorial Official)	Date 6-20-25	Reviewed (Judge/Judge Trial Referee)	Date 6-27-25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT  
www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

**Affidavit - Continued**

*explicitly instructed by multiple managers to add unauthorized services to customer accounts without knowledge or consent.*

*According to [REDACTED], store managers directed employees to add three specific services -- Turbo (\$7), Next Up (\$10-\$14), and insurance (\$14-\$17) --to every customer's account and every phone line, even for customers who merely entered the store to make payments. Management justified this practice by explaining that if customers noticed and complained, the charges would simply be credited back while the employee still received the commission. [REDACTED] further testified that when customers discovered these unauthorized additions and returned to the store to have them removed, employees were instructed to falsely claim they couldn't remove the services and to direct customers to call customer service after 48 hours, despite having the ability to remove them immediately. This delay tactic was designed to ensure the services remained on accounts long enough to qualify for commission metrics.*

*[REDACTED] identified that this practice was driven by AT&T's commission structure, which rewarded employees with bonuses ranging from \$300 to \$3,000 monthly for achieving a 90% close rate on these services. His testimony specifically cited an incident involving a customer named Adam who explicitly declined the Next Up service multiple times, but had added it to his account anyway at management's insistence, which ultimately led to [REDACTED] resignation on December 9, 2024. (This witness statement provides relevant context demonstrating that the fraudulent practices identified in the Connecticut investigation may represent a broader pattern within AT&T's sales operations rather than isolated incidents.)*

10. That, an examination of Barnaby's conduct at the AT&T retail locations reveals that between December 2021 and December 2023, Barnaby engaged in systematic misuse of AT&T's computer systems, accessing and modifying customer account data without proper authorization from the account holders.

(This is page 5 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature]
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature]
Reviewed (Prosecutorial Official)	Date 6-20-25	Reviewed (Judge/Judge Trial Referee)	Date 6-27-25



## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial) Barnaby, Katie	Residence (Town) of accused Stafford	Court to be held at (Town) Rockville	Geographical Area number 19
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## Affidavit - Continued

Barnaby utilized her legitimate system access credentials to make unauthorized modifications to customer accounts following the completion of initial authorized transactions. These modifications included adding unrequested protection plans, creating unauthorized service lines, altering device information, and adjusting rate plans within the AT&T database system. System logs and contemporaneous customer complaints confirm these changes were made without customer knowledge or consent.

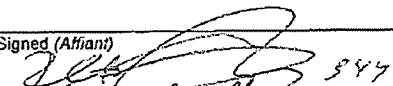
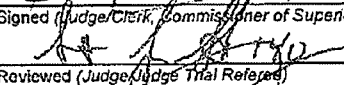
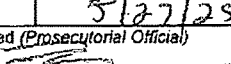
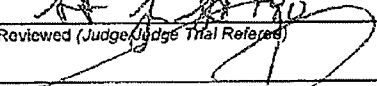
Financial analysis of the affected accounts demonstrates that the total pecuniary impact across the documented victims substantially exceeds \$1,000. Account records for [REDACTED] indicate unauthorized charges approximating \$3,100, while [REDACTED] account reflects estimated fraudulent charges between \$4,680 and \$6,120 over the contract period. In the case of [REDACTED] unauthorized system modifications resulted in billing charges of \$1,539.84, representing nearly six times the originally quoted rate.

System logs document deliberate circumvention of security protocols, as evidenced in [REDACTED] account records: "Bypass use of 1-time PIN for AddAuthorizedUser because Initial PIN not received." AT&T's security systems independently identified these activities as potentially fraudulent, with one account noting "Order stopped due to Avertack Fraud alert."

There is a documented pattern of unauthorized computer access and data manipulation across multiple victim accounts over an extended period. The technical nature of these modifications required deliberate computer system access and specialized knowledge of AT&T's systems, with the apparent motivation of financial gain through commission manipulation.

11. That, based on the preceding facts, the Affiant believes there is sufficient probable cause

(This is page 6 of a 7 page Affidavit.)

Date 5/27/25	Signed (Affiant) 		
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) 	
Reviewed (Prosecutorial Official) 	Date 6-20-25	Reviewed (Judge/Judge Trial Referee) 	Date 6-27-25

**ARREST WARRANT APPLICATION**

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

**STATE OF CONNECTICUT  
SUPERIOR COURT**


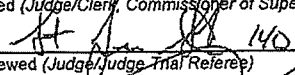
www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

**Affidavit - Continued**

to issue an arrest warrant in the name of Katie Barnaby (DOB: 11/04/1989), last known address of 64 West Street, Apt. A, Stafford, CT, for violation of Connecticut General Statutes.

(This is page 7 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	 344
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	 140
Reviewed (Prosecutorial Official)	Date 6-20-25	Reviewed (Judge/Judge Trial Referee)	Date 6-27-25

**INFORMATION**

JD-CR-71 Rev. 3-11

**STATE OF CONNECTICUT  
SUPERIOR COURT**


Disposition date

Police Case number  
CFS#2500017198

Agency name  
EDMC-C

Agency number  
CSP-400

**Title, Allegation and Counts**

State of Connecticut vs. (Name of accused) <b>Barnaby, Katie</b>		Residence (Town) of accused <b>Stafford</b>	Docket number	
Address <b>64 West Street, Apt. A</b>		Date of birth <b>11/04/1989</b>	The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that:	
To be held at (Town) <b>Rockville</b>		Geographical area number <b>19</b>		
Count One — Did commit the offense of: <b>Computer Crimes Third Degree</b>			Continued to	Purpose
At (Town) <b>Rockville</b>	On or about (Date) <b>Dec 2022-Mar 2025</b>	In violation of General Statute number <b>53a-254</b>		
Count Two — Did commit the offense of:				
At (Town)	On or about (Date)	In violation of General Statute number		
Count Three — Did commit the offense of:				
At (Town)	On or about (Date)	In violation of General Statute number		
<input type="checkbox"/> See other sheet for additional counts			Date <b>6-18-25</b> Signed (Prosecuting Authority) 	

**Court Action**

Defendant advised of rights before plea		Bond	Surety	<input type="checkbox"/> 10 %	Election (Date)
(Judge)	(Date)			<input type="checkbox"/> Cash	<input type="checkbox"/> CT <input type="checkbox"/> JY
<input type="checkbox"/> Attorney	<input type="checkbox"/> Public defender	Guardian	Bond change	Seized property inventory number	

Count	Plea date	Plea	Plea withdrawn		Verdict finding	Fine	Remit	Additional disposition
			Date	New plea				
1						\$	\$	
2						\$	\$	
3						\$	\$	

Date	Other Court Action	Judge

Receipt number	Cost <input type="checkbox"/> IMP <input type="checkbox"/> NCI	Bond information <input type="checkbox"/> Bond forfeited <input type="checkbox"/> Forfeiture vacated <input type="checkbox"/> Forfeiture vacated and bond reinstated	
Application fee - receipt number if paid	Circle one W I Q	Program fee - receipt number if paid	Circle one W I Q
Prosecutor on original disposition	Reporter/monitor on original disposition	Signed (Clerk)	Signed (Judge)

# INFORMATION

JD-CR-71 Rev. 3-11

## STATE OF CONNECTICUT SUPERIOR COURT

Disposition date

Police Case number  
CFS#2500017198

Agency name  
EDMC-C

Agency number  
CSP-400

### Arrest Warrant

Geographical  
area  
number

19

State of Connecticut vs. Barnaby, Katie

To: Any Proper Officer of the State of Connecticut

By Authority of the State of Connecticut, you are hereby commanded to arrest the body of the within-named accused. ("X" all that apply)

- ☐ A. Accused is ordered to be brought before a clerk or assistant clerk of the Superior Court.
- ☐ B. Accused is not entitled to bail.

If A, B or both are checked above, you shall without undue delay bring the arrested person before the clerk or assistant clerk of the Superior Court for the geographical area where the offense is alleged to have been committed, or if the clerk's office is not open, to a community correctional center within said geographical area, or the nearest community correctional center if no such center exists in the geographical area, or to the Correctional Institution, as the case may be.

- ☐ C. Bail set at \_\_\_\_\_.
- ☐ D. Non-financial conditions of release:

Extradition boundaries  
established by prosecutor

- ☒ E. Conditions of release not determined by court.

By the Court

Signed (Judge of the Superior Court)

Date

Name of Judge (Print or type)

6/27/25

Richard Rubino

### Return On Arrest Warrant

Geographical  
area  
number

19

Town of

Tolland

Date

07/10/25

State of Connecticut

Then and there, by virtue of the within and foregoing complaint and warrant, I arrested the body of the within-named accused and read the same in the hearing of said accused; and have said accused here in court for examination.

Attest (Officer's signature and Department)

Cooper [Signature] # 631

Date

Other Court action

Judge

**ARREST WARRANT APPLICATION**JD-CR-64b Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3**STATE OF CONNECTICUT  
SUPERIOR COURT**  
www.jud.ct.gov

For Court Use Only

Supporting Affidavits sealed

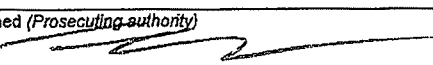
☐ Yes☐ No

Police Case number <b>CFS#2500017198</b>	Agency name <b>EDMC-C</b>	Agency number <b>CSP-400</b>
Name (Last, First, Middle Initial) <b>Barnaby, Katie</b>	Residence (Town) of accused <b>Stafford</b>	Court to be held at (Town) <b>Rockville</b>
		Geographical Area number <b>19</b>

**Application For Arrest Warrant**

To: A Judge of the Superior Court

The undersigned hereby applies for a warrant for the arrest of the above-named accused on the basis of the facts set forth in the: ☒ Affidavit Below. ☐ Affidavit(s) Attached.

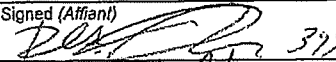
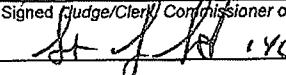
Date <b>6-18-15</b>	Signed (Prosecuting authority) 	Type/print name of prosecuting authority <b>Tenisha Shaw</b>
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**Affidavit**

The undersigned affiant, being duly sworn, deposes and says:

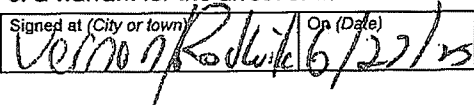
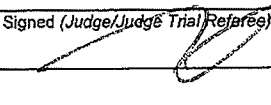
1. The undersigned Affiant, Detective Matthew Hogan #344, being duly sworn, does depose and state that he is a regular sworn member of the Connecticut Department of Emergency Services and Public Protection, Division of State Police, and has been a member of the said department since June 1, 2012. This Affiant presently holds the rank of Detective and is presently assigned to the Eastern District Major Crime Squad, Criminal Investigation Unit, at Troop C in Tolland, Connecticut, who is also duly sworn Special Deputation assigned to the Connecticut Financial Crimes Task Force, United States Secret Service. At all times mentioned herein, the Affiant was acting as an official member of said department. Affiant Hogan has received formal training regarding laws of arrest and laws pertaining to search and seizure from the Connecticut State Police Academy, the Connecticut Municipal Police Officer Standards and Training Council, and has been accredited as a Certified Anti-Money Laundering Specialist by the Associated of Certified Anti-Money Laundering Specialists (ACAMS), Certified Economic Crime Forensic Examiner (CECFE) by the National White Collar Crime Center. The following facts and circumstances are stated from personal knowledge, observation, and investigation, as well as the information received from fellow Troopers/ Police Officers acting in their official capacity, and from official police reports. The knowledge of the facts and circumstances contained hereinafter are the result of the affiant's personal investigative efforts and observations as well as those of other law enforcement officers, acting in their official capacity, who related their findings to this affiant.

(This is page 1 of a 7 page Affidavit.)

Date <b>5/27/25</b>	Signed (Affiant) 
Jurat <b>5/27/25</b>	Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public) 

**Finding**

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and Signature 	Signed at (City or town) <b>Vernon</b>	On (Date) <b>6/22/25</b>	Signed (Judge/Judge Trial Referee) 	Name of Judge/Judge Trial Referee <b>Richard Rubin</b>
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**ARREST WARRANT APPLICATION**

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

**STATE OF CONNECTICUT  
SUPERIOR COURT**

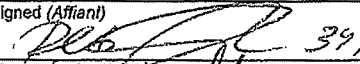

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Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

**Affidavit - Continued**

2. That, I make this affidavit in support of an application for a criminal complaint and a warrant to arrest Katie Barnaby (DOB: 11/04/1989) based on evidence obtained in the investigation conducted by the Connecticut State Police Eastern District Major Crime Squad.
3. That, based on the facts set forth below, this Affiant submits that there is probable cause to believe, that Katie Barnaby (DOB: 11/04/1989) knowingly accessed AT&T's computer systems with intent to modify customer account data by adding protection plans, additional lines, and manipulating rate plans without customer consent or business justification. These unauthorized system accesses and data modifications resulted in financial harm to customers. Barnaby knowingly exceeded her authorized access to modify customer account data for personal gain through commission manipulation.
4. That, on 02/27/24, Eastern District Major Crime detectives were assigned to investigate a fraud scheme involving former AT&T employee, Katie Barnaby. In December of 2021, at an AT&T retailer in Stafford, Barnaby allegedly misled a customer by secretly adding unauthorized phone and tablet lines to their account for commission, resulting in approximately \$2,000 in unauthorized charges over a 26-month period. The investigation revealed multiple victims at other AT&T locations. Barnaby was arrested on the strength of an arrest warrant on 01/03/25 and charged with Computer Crimes Third Degree (53a-254) for CFS #2400078263.
5. That, AT&T utilizes two distinct retail distribution models to serve customers: corporate-owned stores and authorized retailers. These different business arrangements have significant implications for consumer experiences, pricing structures, employee incentives, and accountability mechanisms.

(This is page 2 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	 399
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public)	 140
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6-27-25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT  
www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

AT&T corporate stores are wholly owned and operated by AT&T Inc. directly. These locations represent the company's official retail presence, with employees who work directly for AT&T as corporate staff members. In contrast, authorized retailers like [REDACTED] (where Barnaby worked) and [REDACTED] are independent businesses that operate under licensing agreements with AT&T. These retailers are essentially franchises or third-party partners that have contracted with AT&T to sell its products and services under the AT&T brand name. While they display AT&T signage and branding that appears nearly identical to corporate locations, they are separately owned businesses.

6. That, upon the press release for Barnaby's arrest under CFS 2400078263, Troop C - Tolland began receiving numerous complaints involving Barnaby. The following is a list of victims, and the AT&T store associated:

- a) 25-17196 [REDACTED] - Stafford AT&T
- b) 25-17372 [REDACTED] - Willimantic AT&T
- c) 25-17198 [REDACTED] - Colchester AT&T
- d) 25-31860 [REDACTED] - Stafford AT&T
- e) 25-17376 [REDACTED] - Stafford AT&T
- f) 25-17377 [REDACTED] - Willimantic AT&T

7. That, on 03/28/25, Affiant Hogan #344 and Det. Picard #712 had a series of search and seizure warrants for the above victims AT&T account records approved by GA19 Rockville Superior Court Judge McNamara. These documents were sent to AT&T's legal department and a response with records was returned on or about 04/16/25.

(This is page 3 of a 7 page Affidavit.)

Date 5/27/25		Signed (Affiant) Det. [Signature]	
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) [Signature]	
Reviewed (Prosecutorial Official) [Signature]	Date 6-18-25	Reviewed (Judge/Judge Trial Referee) [Signature]	Date 6-22-25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

8. That, the following is a summary of the above victim account records and victim statement:

- c. [REDACTED] Barnaby accessed AT&T's computer systems on December 5, 2022, to add unauthorized lines to [REDACTED] account, explicitly bypassing security protocols as documented in the system logs: "Bypass use of 1-time PIN for AddAuthorizedUser because Initial PIN not received. The last 4 SSN was validated." System notes confirm [REDACTED] immediately disputed these changes, stating: "cx wants to cancel 2 added line on the acc // rep mention that they did not authorize to add this lines on the acc." AT&T's own security system flagged the activity on December 16, 2022: "Order stopped due to Avertack Fraud alert." Based on standard AT&T pricing, the unauthorized computer system modifications resulted in approximately \$4,680-\$6,120 in fraudulent charges over the contract period.

9. That, along with numerous victim complaint reports to Troop C, there were current and former AT&T employees e-mailing and calling to provide their accounts from around the United States. On or about 01/22/25, Affiant Hogan was contacted by [REDACTED] a prior [REDACTED] AT&T employee based in Michigan who alleged fraud was common practice at Prime Communications (AT&T authorized retailer). [REDACTED] agreed to provide a sworn written statement to Michigan State Police D/Sgt. Brian Siemen #295 to assist with our investigation. The following is a summary of pertinent facts:

*Former AT&T retail employee [REDACTED] provided testimony to Michigan State Police on January 22, 2025, that corroborates the systematic nature of the fraudulent practices observed in the Connecticut investigation. [REDACTED] stated that during his two-month employment at an AT&T authorized retailer from October to December 2024, he was explicitly instructed by multiple managers to add unauthorized services to customer accounts without knowledge or consent.*

(This is page 4 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature]
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature]
Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date
[Signature]	6-18-25	[Signature]	6-27-25



## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

According to [REDACTED] store managers directed employees to add three specific services -- Turbo (\$7), Next Up (\$10-\$14), and insurance (\$14-\$17) -- to every customer's account and every phone line, even for customers who merely entered the store to make payments. Management justified this practice by explaining that if customers noticed and complained, the charges would simply be credited back while the employee still received the commission. [REDACTED] further testified that when customers discovered these unauthorized additions and returned to the store to have them removed, employees were instructed to falsely claim they couldn't remove the services and to direct customers to call customer service after 48 hours, despite having the ability to remove them immediately. This delay tactic was designed to ensure the services remained on accounts long enough to qualify for commission metrics.

[REDACTED] identified that this practice was driven by AT&T's commission structure, which rewarded employees with bonuses ranging from \$300 to \$3,000 monthly for achieving a 90% close rate on these services. His testimony specifically cited an incident involving a customer named Adam who explicitly declined the Next Up service multiple times, but had added it to his account anyway at management's insistence, which ultimately led to [REDACTED] resignation on December 9, 2024. (This witness statement provides relevant context demonstrating that the fraudulent practices identified in the Connecticut investigation may represent a broader pattern within AT&T's sales operations rather than isolated incidents.)

10. That, an examination of Barnaby's conduct at the AT&T retail locations reveals that between December 2021 and December 2023, Barnaby engaged in systematic misuse of AT&T's computer systems, accessing and modifying customer account data without proper authorization from the account holders.

Barnaby utilized her legitimate system access credentials to make unauthorized

(This is page 5 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature]
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public)	[Signature]
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6-27-25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT  
www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

**Affidavit - Continued**

modifications to customer accounts following the completion of initial authorized transactions. These modifications included adding unrequested protection plans, creating unauthorized service lines, altering device information, and adjusting rate plans within the AT&T database system. System logs and contemporaneous customer complaints confirm these changes were made without customer knowledge or consent.

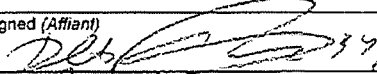

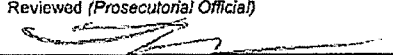
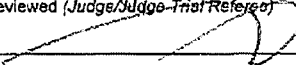
Financial analysis of the affected accounts demonstrates that the total pecuniary impact across the documented victims substantially exceeds \$1,000. Account records for [REDACTED] indicate unauthorized charges approximating \$3,100, while [REDACTED] account reflects estimated fraudulent charges between \$4,680 and \$6,120 over the contract period. In the case of [REDACTED] unauthorized system modifications resulted in billing charges of \$1,539.84, representing nearly six times the originally quoted rate.

System logs document deliberate circumvention of security protocols, as evidenced in [REDACTED] account records: "Bypass use of 1-time PIN for AddAuthorizedUser because Initial PIN not received." AT&T's security systems independently identified these activities as potentially fraudulent, with one account noting "Order stopped due to Avertack Fraud alert."

There is a documented pattern of unauthorized computer access and data manipulation across multiple victim accounts over an extended period. The technical nature of these modifications required deliberate computer system access and specialized knowledge of AT&T's systems, with the apparent motivation of financial gain through commission manipulation.

11. That, based on the preceding facts, the Affiant believes there is sufficient probable cause to issue an arrest warrant in the name of Katie Barnaby (DOB: 11/04/1989), last known address of 64 West Street, Apt. A, Stafford, CT, for violation of Connecticut General

(This is page 6 of a 7 page Affidavit.)

Date 5/27/25		Signed (Affiant) 	
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public) 	
Reviewed (Prosecutorial Official) 	Date 6-18-25	Reviewed (Judge/Judge Trial Referee) 	Date 6-27-25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

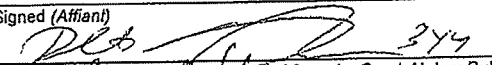
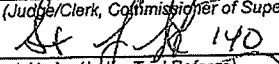
STATE OF CONNECTICUT  
SUPERIOR COURT  
www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

Statutes.

(This is page 7 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6-22-25

**INFORMATION**

JD-CR-71 Rev. 3-11

**STATE OF CONNECTICUT  
SUPERIOR COURT**

Disposition date

Police Case number

CFS#2500031860

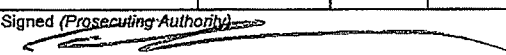
Agency name

EDMC-C

Agency number

CSP-400

**Title, Allegation and Counts**

State of Connecticut vs. (Name of accused) <b>Barnaby, Katie</b>		Residence (Town) of accused <b>Stafford</b>	Docket number	
Address <b>64 West Street, Apt. A</b>		Date of birth <b>11/04/1989</b>	The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that:	
To be held at (Town) <b>Rockville</b>		Geographical area number <b>19</b>		
Count One — Did commit the offense of: <b>Computer Crimes Third Degree</b>			Continued to	Purpose
At (Town) <b>Stafford</b>	On or about (Date) <b>Aug 2023-May 2025</b>	In violation of General Statute number <b>53a-254</b>		
Count Two — Did commit the offense of:				
At (Town)	On or about (Date)	In violation of General Statute number		
Count Three — Did commit the offense of:				
At (Town)	On or about (Date)	In violation of General Statute number		
<input type="checkbox"/> See other sheet for additional counts			Date <b>6-18-25</b>	Signed (Prosecuting Authority) 

**Court Action**

Defendant advised of rights before plea (Judge) _____ (Date) _____		Bond	Surety	<input type="checkbox"/> 10 %	Election (Date)			
<input type="checkbox"/> Attorney <input type="checkbox"/> Public defender <input type="checkbox"/> Guardian		Bond change	<input type="checkbox"/> Cash <input type="checkbox"/> CT <input type="checkbox"/> JY		Seized property inventory number			
Count	Plea date	Plea	Plea withdrawn Date	New plea	Verdict finding	Fine	Remit	Additional disposition
1						\$	\$	
2						\$	\$	
3						\$	\$	
Date	Other Court Action							Judge
Receipt number	Cost <input type="checkbox"/> IMP <input type="checkbox"/> NCI	Bond Information <input type="checkbox"/> Bond forfeited <input type="checkbox"/> Forfeiture vacated <input type="checkbox"/> Forfeiture vacated and bond reinstated						
Application fee - receipt number if paid	Circle one W I Q	Program fee - receipt number if paid	Circle one W I Q	Probation fee - receipt number if paid	Circle one W I Q			
Prosecutor on original disposition		Reporter/monitor on original disposition		Signed (Clerk)		Signed (Judge)		

## JD-CR-71 Rev. 3-11

STATE OF CONNECTICUT  
SUPERIOR COURT

Disposition date

Police Case number  
**CFS#2500031860**

Agency name  
EDMC-C

Agency number  
**CSP-400**

## Arrest Warrant

Geographical  
area  
number

19

**State of Connecticut vs. Barnaby, Katie**

To: Any Proper Officer of the State of Connecticut

By Authority of the State of Connecticut, you are hereby commanded to arrest the body of the within-named accused. ("X" all that apply)

- ☐ A. Accused is ordered to be brought before a clerk or assistant clerk of the Superior Court.
- ☐ B. Accused is not entitled to bail.

If A, B or both are checked above, you shall without undue delay bring the arrested person before the clerk or assistant clerk of the Superior Court for the geographical area where the offense is alleged to have been committed, or if the clerk's office is not open, to a community correctional center within said geographical area, or the nearest community correctional center if no such center exists in the geographical area, or to the Correctional Institution, as the case may be.

- ☐ C. Bail set at \_\_\_\_\_
- ☐ D. Non-financial conditions of release:

**Extradition boundaries established by prosecutor**

☒ E. Conditions of release not determined by court.

### By the Court

Signed (Judge of the Superior Court)

Date \_\_\_\_\_

Name of Judge (Print or type)

## Return On Arrest Warrant

Geographical  
area  
number

Town of

Date \_\_\_\_\_

**State of Connecticut**

Then and there, by virtue of the within and foregoing complaint and warrant, I arrested the body of the within-named accused and read the same in the hearing of said accused; and have said accused here in court for examination.

Attest (Officer's signature and Department)

[illegible]

**ARREST WARRANT APPLICATION**JD-CR-64b Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3**STATE OF CONNECTICUT  
SUPERIOR COURT**  
www.jud.ct.gov

For Court Use Only

Supporting Affidavits sealed


☐ Yes ☐ No

Police Case number <b>CFS#2500031860</b>	Agency name <b>EDMC-C</b>	Agency number <b>CSP-400</b>
Name (Last, First, Middle Initial) <b>Barnaby, Katie</b>	Residence (Town) of accused <b>Stafford</b>	Court to be held at (Town) <b>Rockville</b>
		Geographical Area number <b>19</b>

**Application For Arrest Warrant**

To: A Judge of the Superior Court

The undersigned hereby applies for a warrant for the arrest of the above-named accused on the basis of the facts set forth in the: ☒ Affidavit Below. ☐ Affidavit(s) Attached.

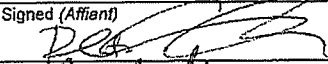
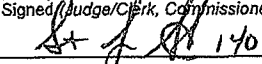
Date <b>6-18-25</b>	Signed (Prosecuting authority) 	Type/print name of prosecuting authority <b>Matthew Hogan</b>
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**Affidavit**

The undersigned affiant, being duly sworn, deposes and says:

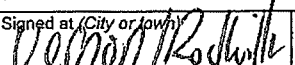
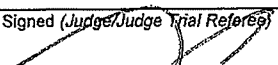
1. The undersigned Affiant, Detective Matthew Hogan #344, being duly sworn, does depose and state that he is a regular sworn member of the Connecticut Department of Emergency Services and Public Protection, Division of State Police, and has been a member of the said department since June 1, 2012. This Affiant presently holds the rank of Detective and is presently assigned to the Eastern District Major Crime Squad, Criminal Investigation Unit, at Troop C in Tolland, Connecticut, who is also duly sworn Special Deputation assigned to the Connecticut Financial Crimes Task Force, United States Secret Service. At all times mentioned herein, the Affiant was acting as an official member of said department. Affiant Hogan has received formal training regarding laws of arrest and laws pertaining to search and seizure from the Connecticut State Police Academy, the Connecticut Municipal Police Officer Standards and Training Council, and has been accredited as a Certified Anti-Money Laundering Specialist by the Associated of Certified Anti-Money Laundering Specialists (ACAMS), Certified Economic Crime Forensic Examiner (CECFE) by the National White Collar Crime Center. The following facts and circumstances are stated from personal knowledge, observation, and investigation, as well as the information received from fellow Troopers/ Police Officers acting in their official capacity, and from official police reports. The knowledge of the facts and circumstances contained hereinafter are the result of the affiant's personal investigative efforts and observations as well as those of other law enforcement officers, acting in their official capacity, who related their findings to this affiant.

(This is page 1 of a 6 page Affidavit.)

Date <b>5/27/25</b>	Signed (Affiant)  <b>399</b>
Jurat Subscribed and sworn to before me on (Date) <b>5/27/25</b>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)  <b>170</b>

**Finding**

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and Signature 	Signed at (City or town) <b>Vernon/Rockville</b>	On (Date) <b>6/27/25</b>	Signed (Judge/Judge Trial Referee) 	Name of Judge/Judge Trial Referee <b>Richard Abraz</b>
---	---	-----------------------------	---	---

**ARREST WARRANT APPLICATION**

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

**STATE OF CONNECTICUT  
SUPERIOR COURT**

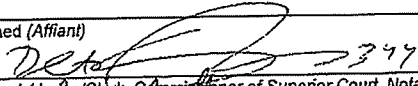
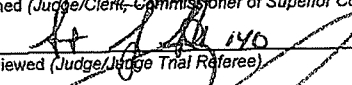
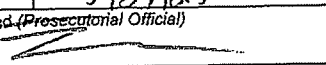

www.jud.ct.gov

Name (Last, First, Middle Initial) Barnaby, Katie	Residence (Town) of accused Stafford	Court to be held at (Town) Rockville	Geographical Area number 19
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**Affidavit - Continued**

2. That, I make this affidavit in support of an application for a criminal complaint and a warrant to arrest Katie Barnaby (DOB: 11/04/1989) based on evidence obtained in the investigation conducted by the Connecticut State Police Eastern District Major Crime Squad.
3. That, based on the facts set forth below, this Affiant submits that there is probable cause to believe, that Katie Barnaby (DOB: 11/04/1989) knowingly accessed AT&T's computer systems with intent to modify customer account data by adding protection plans, additional lines, and manipulating rate plans without customer consent or business justification. These unauthorized system accesses and data modifications resulted in financial harm to customers. Barnaby knowingly exceeded her authorized access to modify customer account data for personal gain through commission manipulation.
4. That, on 02/27/24, Eastern District Major Crime detectives were assigned to investigate a fraud scheme involving former AT&T employee, Katie Barnaby. In December of 2021, at an AT&T retailer in Stafford, Barnaby allegedly misled a customer by secretly adding unauthorized phone and tablet lines to their account for commission, resulting in approximately \$2,000 in unauthorized charges over a 26-month period. The investigation revealed multiple victims at other AT&T locations. Barnaby was arrested on the strength of an arrest warrant on 01/03/25 and charged with Computer Crimes Third Degree (53a-254) for CFS #2400078263.
5. That, AT&T utilizes two distinct retail distribution models to serve customers: corporate-owned stores and authorized retailers. These different business arrangements have significant implications for consumer experiences, pricing structures, employee incentives, and accountability mechanisms.

(This is page 2 of a 6 page Affidavit.)

Date 5/27/25	Signed (Affiant) 		
Jurat Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) 		
Reviewed (Prosecutorial Official) 	Date 6-18-25	Reviewed (Judge/Judge Trial Referee) 	Date 6/27/25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11

C.G.S. § 54-2a

Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

AT&T corporate stores are wholly owned and operated by AT&T Inc. directly. These locations represent the company's official retail presence, with employees who work directly for AT&T as corporate staff members. In contrast, authorized retailers like [REDACTED] (where Barnaby worked) and [REDACTED] are independent businesses that operate under licensing agreements with AT&T. These retailers are essentially franchises or third-party partners that have contracted with AT&T to sell its products and services under the AT&T brand name. While they display AT&T signage and branding that appears nearly identical to corporate locations, they are separately owned businesses.

6. That, upon the press release for Barnaby's arrest under CFS 2400078263, Troop C - Tolland began receiving numerous complaints involving Barnaby. The following is a list of victims, and the AT&T store associated:

- a) 25-17196 [REDACTED] - Stafford AT&T
- b) 25-17372 [REDACTED] - Willimantic AT&T
- c) 25-17198 [REDACTED] - Colchester AT&T
- d) 25-31860 [REDACTED] - Stafford AT&T
- e) 25-17376 [REDACTED] - Stafford AT&T
- f) 25-17377 [REDACTED] - Willimantic AT&T

7. That, on 03/28/25, Affiant Hogan #344 and Det. Picard #712 had a series of search and seizure warrants for the above victims AT&T account records approved by GA19 Rockville Superior Court Judge McNamara. These documents were sent to AT&T's legal department and a response with records was returned on or about 04/16/25.

8. That, the following is a summary of the above victim account records and victim statement in order:

(This is page 3 of a 6 page Affidavit.)

Date	5/27/25	Signed (Affiant)	Det. [Signature] 344
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) [Signature] 140	
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6/27/25



## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

d. [REDACTED] Barnaby accessed [REDACTED] AT&T account on August 22-23, 2023, making multiple unauthorized modifications including device IMEI changes, numerous SOC changes, and SIM card changes. Though authentication protocols were superficially followed, Barnaby misused her system access to make unauthorized modifications that dramatically increased [REDACTED] monthly bill from approximately \$374-379 to \$468.39. The records show network-triggered IMEI changes with the notation "Customer is using new equipment," supporting [REDACTED] claim of receiving a used phone without authorization.

9. That, along with numerous victim complaint reports to Troop C, there were current and former AT&T employees e-mailing and calling to provide their accounts from around the United States. On or about 01/22/25, Affiant Hogan was contacted by [REDACTED] a prior [REDACTED] AT&T employee based in Michigan who alleged fraud was common practice at [REDACTED] (AT&T authorized retailer). [REDACTED] agreed to provide a sworn written statement to Michigan State Police D/Sgt. Brian Siemen #295 to assist with our investigation. The following is a summary of pertinent facts:

*Former AT&T retail employee [REDACTED] provided testimony to Michigan State Police on January 22, 2025, that corroborates the systematic nature of the fraudulent practices observed in the Connecticut investigation. [REDACTED] stated that during his two-month employment at an AT&T authorized retailer from October to December 2024, he was explicitly instructed by multiple managers to add unauthorized services to customer accounts without knowledge or consent.*

*According to [REDACTED] store managers directed employees to add three specific services -- Turbo (\$7), Next Up (\$10-\$14), and insurance (\$14-\$17) --to every customer's account and every phone line, even for customers who merely entered the store to make payments. Management justified this practice by explaining that if customers noticed and complained, the charges would simply be credited back while the employee still received the commission. [REDACTED] further testified that when customers discovered these unauthorized additions and returned to the store to have them removed, employees were instructed to falsely claim they*

(This is page 4 of a 6 page Affidavit.)

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Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6/27/25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11

C.G.S. § 54-2a

Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

**Affidavit - Continued**

*couldn't remove the services and to direct customers to call customer service after 48 hours, despite having the ability to remove them immediately. This delay tactic was designed to ensure the services remained on accounts long enough to qualify for commission metrics.*

██████████ identified that this practice was driven by AT&T's commission structure, which rewarded employees with bonuses ranging from \$300 to \$3,000 monthly for achieving a 90% close rate on these services. His testimony specifically cited an incident involving a customer named Adam who explicitly declined the Next Up service multiple times, but had added it to his account anyway at management's insistence, which ultimately led to ██████████ resignation on December 9, 2024. (This witness statement provides relevant context demonstrating that the fraudulent practices identified in the Connecticut investigation may represent a broader pattern within AT&T's sales operations rather than isolated incidents.)

10. That, an examination of Barnaby's conduct at the AT&T retail locations reveals that between December 2021 and December 2023, Barnaby engaged in systematic misuse of AT&T's computer systems, accessing and modifying customer account data without proper authorization from the account holders.

Barnaby utilized her legitimate system access credentials to make unauthorized modifications to customer accounts following the completion of initial authorized transactions. These modifications included adding unrequested protection plans, creating unauthorized service lines, altering device information, and adjusting rate plans within the AT&T database system. System logs and contemporaneous customer complaints confirm these changes were made without customer knowledge or consent.

Financial analysis of the affected accounts demonstrates that the total pecuniary impact across the documented victims substantially exceeds \$1,000. Account records for ██████████ indicate unauthorized charges approximating \$3,100, while ██████████ account reflects estimated fraudulent charges between \$4,680 and \$6,120 over the contract period. In the case of ██████████ unauthorized system modifications resulted in billing charges of \$1,539.84, representing nearly six times the originally quoted rate.

(This is page 5 of a 6 page Affidavit.)

Date	5/27/25	Signed (Affiant)	<i>[Signature]</i> 397
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public) <i>[Signature]</i> 140	
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6/27/25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT  
www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

System logs document deliberate circumvention of security protocols, as evidenced in [REDACTED] account records: "Bypass use of 1-time PIN for AddAuthorizedUser because Initial PIN not received." AT&T's security systems independently identified these activities as potentially fraudulent, with one account noting "Order stopped due to Avertack Fraud alert."

There is a documented pattern of unauthorized computer access and data manipulation across multiple victim accounts over an extended period. The technical nature of these modifications required deliberate computer system access and specialized knowledge of AT&T's systems, with the apparent motivation of financial gain through commission manipulation.

11. That, based on the preceding facts, the Affiant believes there is sufficient probable cause to issue an arrest warrant in the name of Katie Barnaby (DOB: 11/04/1989), last known address of 64 West Street, Apt. A, Stafford, CT, for violation of Connecticut General Statutes.

(This is page 6 of a 6 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature]
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public)	[Signature]
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6/27/25

# INFORMATION

JD-CR-71 Rev. 3-11

## STATE OF CONNECTICUT SUPERIOR COURT

Disposition date

Police Case number

CFS#2500017376

Agency name

EDMC-C

Agency number

CSP-400

### Title, Allegation and Counts

State of Connecticut vs. (Name of accused)

Barnaby, Katie

Residence (Town) of accused

Stafford

Docket number

Address

64 West Street, Apt. A

Date of birth

11/04/1989

To be held at (Town)

Rockville

Geographical area number

19

Court date

The undersigned Prosecuting Authority of the Superior Court of the State of Connecticut charges that:

Count One — Did commit the offense of:

Computer Crimes Third Degree

Continued to

Purpose

Reason

At (Town)

Rockville

On or about (Date)

June 2021-April 2024

In violation of General Statute number

53a-254

Count Two — Did commit the offense of:

At (Town)

On or about (Date)

In violation of General Statute number

Count Three — Did commit the offense of:

At (Town)

On or about (Date)

In violation of General Statute number

☐ See other sheet for additional counts

Date

6-18-25

Signed (Prosecuting Authority)

### Court Action

Defendant advised of rights before plea

(Judge)

(Date)

Bond

Surety

☐ 10 %

Election

(Date)

☐ Cash

☐ CT ☐ JY

☐ Attorney

☐ Public defender

Guardian

Bond change

Seized property inventory number

Count

Plea date

Plea

Plea withdrawn

Date

New plea

Verdict finding

Fine

Remit

Additional disposition

1

2

3

Date

Other Court Action

Judge

Receipt number

Cost

☐ IMP ☐ NCI

Bond information

☐ Bond forfeited

☐ Forfeiture vacated

☐ Forfeiture vacated and bond reinstated

Application fee - receipt number if paid

Circle one  
W I Q

Program fee - receipt number if paid

Circle one  
W I Q

Probation fee - receipt number if paid

Circle one  
W I Q

Prosecutor on original disposition

Reporter/monitor on original disposition

Signed (Clerk)

Signed (Judge)

## JD-CR-71 Rev. 3-11

STATE OF CONNECTICUT  
SUPERIOR COURT

Disposition date

Police Case number

CFS#2500017376

Agency name

EDMC-C

Agency number

CSP-400

## Arrest Warrant

Geographical  
area  
number

19

**State of Connecticut vs. Barnaby, Katie**

To: Any Proper Officer of the State of Connecticut

By Authority of the State of Connecticut, you are hereby commanded to arrest the body of the within-named accused. ("X" all that apply)

- ☐ A. Accused is ordered to be brought before a clerk or assistant clerk of the Superior Court.
- ☐ B. Accused is not entitled to bail.

If A, B or both are checked above, you shall without undue delay bring the arrested person before the clerk or assistant clerk of the Superior Court for the geographical area where the offense is alleged to have been committed, or if the clerk's office is not open, to a community correctional center within said geographical area, or the nearest community correctional center if no such center exists in the geographical area, or to the Correctional Institution, as the case may be.

- ☐ C. Bail set at \_\_\_\_\_.
- ☐ D. Non-financial conditions of release:

**Extradition boundaries established by prosecutor**

☒ E. Conditions of release not determined by court.

### By the Court

Signed (Judge of the Superior Court)

Date \_\_\_\_\_

Date 6-27-25

Name of Judge (Print or type)

Name of Judge (Print or type) Richard Lubin

## Return On Arrest Warrant

Geographical  
area  
number

Town of

19

Tolland

Date \_\_\_\_\_

Date 07/02/25

**State of Connecticut**

number 19 *Volano*

Then and there, by virtue of the within and foregoing complaint and warrant, I arrested the body of the within-named accused and read the same in the hearing of said accused; and have said accused here in court for examination.

Attest (Officer's signature and Department)

Other Court action

[illegible]

**ARREST WARRANT APPLICATION**JD-CR-64b Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3**STATE OF CONNECTICUT  
SUPERIOR COURT**  
www.jud.ct.gov

For Court Use Only	
Supporting Affidavits sealed	
<input type="checkbox"/> Yes	<input type="checkbox"/> No

Police Case number <b>CFS#2500017376</b>	Agency name <b>EDMC-C</b>	Agency number <b>CSP-400</b>
Name (Last, First, Middle Initial) <b>Barnaby, Katie</b>	Residence (Town) of accused <b>Stafford</b>	Court to be held at (Town) <b>Rockville</b>
		Geographical Area number <b>19</b>

**Application For Arrest Warrant**

To: A Judge of the Superior Court

The undersigned hereby applies for a warrant for the arrest of the above-named accused on the basis of the facts set forth in the: ☒ Affidavit Below. ☐ Affidavit(s) Attached.

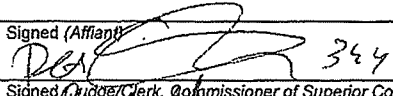
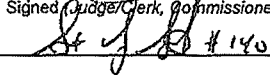
Date <b>6-18-25</b>	Signed (Prosecuting authority) 	Type/print name of prosecuting authority <b>Jenathan Shaw</b>
------------------------	---	--

**Affidavit**

The undersigned affiant, being duly sworn, deposes and says:

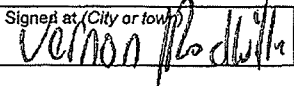
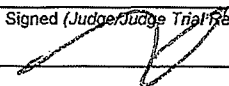
1. The undersigned Affiant, Detective Matthew Hogan #344, being duly sworn, does depose and state that he is a regular sworn member of the Connecticut Department of Emergency Services and Public Protection, Division of State Police, and has been a member of the said department since June 1, 2012. This Affiant presently holds the rank of Detective and is presently assigned to the Eastern District Major Crime Squad, Criminal Investigation Unit, at Troop C in Tolland, Connecticut, who is also duly sworn Special Deputation assigned to the Connecticut Financial Crimes Task Force, United States Secret Service. At all times mentioned herein, the Affiant was acting as an official member of said department. Affiant Hogan has received formal training regarding laws of arrest and laws pertaining to search and seizure from the Connecticut State Police Academy, the Connecticut Municipal Police Officer Standards and Training Council, and has been accredited as a Certified Anti-Money Laundering Specialist by the Associated of Certified Anti-Money Laundering Specialists (ACAMS), Certified Economic Crime Forensic Examiner (CECFE) by the National White Collar Crime Center. The following facts and circumstances are stated from personal knowledge, observation, and investigation, as well as the information received from fellow Troopers/ Police Officers acting in their official capacity, and from official police reports. The knowledge of the facts and circumstances contained hereinafter are the result of the affiant's personal investigative efforts and observations as well as those of other law enforcement officers, acting in their official capacity, who related their findings to this affiant.

(This is page 1 of a 7 page Affidavit.)

Date <b>5/27/25</b>	Signed (Affiant)  <b>344</b>
Jurat <b>5/27/25</b>	Subscribed and sworn to before me on (Date) <b>5/27/25</b>
Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)  <b>#140</b>	

**Finding**

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and Signature  <b>Vernon Rodwell</b>	Signed at (City or town) <b>6-27-25</b>	On (Date) <b>6-27-25</b>	Signed (Judge/Judge Trial Referee) 	Name of Judge/Judge Trial Referee <b>Richard A. Bivona</b>
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**ARREST WARRANT APPLICATION**JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3**STATE OF CONNECTICUT  
SUPERIOR COURT**

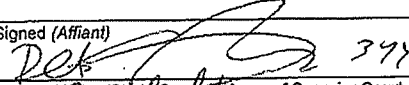
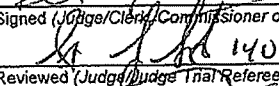
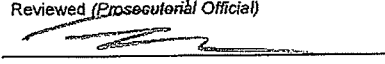
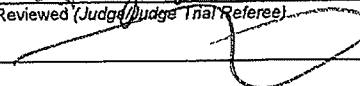
www.jud.ct.gov

Name (Last, First, Middle Initial) Barnaby, Katie	Residence (Town) of accused Stafford	Court to be held at (Town) Rockville	Geographical Area number 19
--	---	---	-----------------------------------

**Affidavit - Continued**

2. That, I make this affidavit in support of an application for a criminal complaint and a warrant to arrest Katie Barnaby (DOB: 11/04/1989) based on evidence obtained in the investigation conducted by the Connecticut State Police Eastern District Major Crime Squad.
3. That, based on the facts set forth below, this Affiant submits that there is probable cause to believe, that Katie Barnaby (DOB: 11/04/1989) knowingly accessed AT&T's computer systems with intent to modify customer account data by adding protection plans, additional lines, and manipulating rate plans without customer consent or business justification. These unauthorized system accesses and data modifications resulted in financial harm to customers. Barnaby knowingly exceeded her authorized access to modify customer account data for personal gain through commission manipulation.
4. That, on 02/27/24, Eastern District Major Crime detectives were assigned to investigate a fraud scheme involving former AT&T employee, Katie Barnaby. In December of 2021, at an AT&T retailer in Stafford, Barnaby allegedly misled a customer by secretly adding unauthorized phone and tablet lines to their account for commission, resulting in approximately \$2,000 in unauthorized charges over a 26-month period. The investigation revealed multiple victims at other AT&T locations. Barnaby was arrested on the strength of an arrest warrant on 01/03/25 and charged with Computer Crimes Third Degree (53a-254) for CFS #2400078263.
5. That, AT&T utilizes two distinct retail distribution models to serve customers: corporate-owned stores and authorized retailers. These different business arrangements have significant implications for consumer experiences, pricing structures, employee incentives, and accountability mechanisms.

(This is page 2 of a 7 page Affidavit.)

Date 5/27/25	Signed (Affiant) 		
Jurat Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public) 		
Reviewed (Prosecutorial Official) 	Date 6-18-25	Reviewed (Judge/Judge Trial Referee) 	Date 6-27-25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT  
www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

AT&T corporate stores are wholly owned and operated by AT&T Inc. directly. These locations represent the company's official retail presence, with employees who work directly for AT&T as corporate staff members. In contrast, authorized retailers like [REDACTED] (where Barnaby worked) and [REDACTED] are independent businesses that operate under licensing agreements with AT&T. These retailers are essentially franchises or third-party partners that have contracted with AT&T to sell its products and services under the AT&T brand name. While they display AT&T signage and branding that appears nearly identical to corporate locations, they are separately owned businesses.

6. That, upon the press release for Barnaby's arrest under CFS 2400078263, Troop C - Tolland began receiving numerous complaints involving Barnaby. The following is a list of victims, and the AT&T store associated:

- a) 25-17196 [REDACTED] - Stafford AT&T
- b) 25-17372 [REDACTED] - Willimantic AT&T
- c) 25-17198 [REDACTED] - Colchester AT&T
- d) 25-31860 [REDACTED] - Stafford AT&T
- e) 25-17376 [REDACTED] - Stafford AT&T
- f) 25-17377 [REDACTED] - Willimantic AT&T

7. That, on 03/28/25, Affiant Hogan #344 and Det. Picard #712 had a series of search and seizure warrants for the above victims AT&T account records approved by GA19 Rockville Superior Court Judge McNamara. These documents were sent to AT&T's legal department and a response with records was returned on or about 04/16/25.

(This is page 3 of a 7 page Affidavit.)

Date 5/27/25		Signed (Affiant) Det. [Signature] 344	
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public) [Signature] 140	
Reviewed (Prosecutorial Official) [Signature]	Date 6-18-25	Reviewed (Judge/Judge Trial Referee) [Signature]	Date 6-27-25



## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT  
www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

8. That, the following is a summary of the above victim account records and victim statement in order:

- e. [REDACTED] Barnaby accessed AT&T's computer systems to add unauthorized devices and services to [REDACTED] account, specifically adding an Apple Watch instead of the Samsung device he requested. Despite [REDACTED] returning the unauthorized device (confirmed by tracking number [REDACTED]), Barnaby continued to maintain the unauthorized line charges in the system. Her unauthorized access and data manipulation resulted in persistent billing issues, causing [REDACTED] account to be marked delinquent at least ten separate times between 2022-2024. These unauthorized system modifications caused significant financial harm that [REDACTED] claims totaled approximately \$3,100, ultimately forcing him to terminate his AT&T service in early 2024.

9. That, along with numerous victim complaint reports to Troop C, there were current and former AT&T employees e-mailing and calling to provide their accounts from around the United States. On or about 01/22/25, Affiant Hogan was contacted by [REDACTED] a prior [REDACTED] AT&T employee based in Michigan who alleged fraud was common practice at [REDACTED] (AT&T authorized retailer). [REDACTED] agreed to provide a sworn written statement to Michigan State Police D/Sgt. Brian Siemen #295 to assist with our investigation. The following is a summary of pertinent facts:

*Former AT&T retail employee [REDACTED] provided testimony to Michigan State Police on January 22, 2025, that corroborates the systematic nature of the fraudulent practices observed in the Connecticut investigation. [REDACTED] stated that during his two-month employment at an AT&T authorized retailer from October to December 2024, he was explicitly instructed by multiple managers to add unauthorized services to customer*

(This is page 4 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature] 377
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) [Signature]	
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6-27-25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

*accounts without knowledge or consent.*

According to [REDACTED] store managers directed employees to add three specific services -- Turbo (\$7), Next Up (\$10-\$14), and insurance (\$14-\$17) -- to every customer's account and every phone line, even for customers who merely entered the store to make payments. Management justified this practice by explaining that if customers noticed and complained, the charges would simply be credited back while the employee still received the commission. [REDACTED] further testified that when customers discovered these unauthorized additions and returned to the store to have them removed, employees were instructed to falsely claim they couldn't remove the services and to direct customers to call customer service after 48 hours, despite having the ability to remove them immediately. This delay tactic was designed to ensure the services remained on accounts long enough to qualify for commission metrics.

[REDACTED] identified that this practice was driven by AT&T's commission structure, which rewarded employees with bonuses ranging from \$300 to \$3,000 monthly for achieving a 90% close rate on these services. His testimony specifically cited an incident involving a customer named Adam who explicitly declined the Next Up service multiple times, but had added it to his account anyway at management's insistence, which ultimately led to [REDACTED] resignation on December 9, 2024. (This witness statement provides relevant context demonstrating that the fraudulent practices identified in the Connecticut investigation may represent a broader pattern within AT&T's sales operations rather than isolated incidents.)

10. That, an examination of Barnaby's conduct at the AT&T retail locations reveals that between December 2021 and December 2023, Barnaby engaged in systematic misuse of AT&T's computer systems, accessing and modifying customer account data without proper authorization from the account holders.

(This is page 5 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature]
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature]
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6-27-25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT  
www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

Barnaby utilized her legitimate system access credentials to make unauthorized modifications to customer accounts following the completion of initial authorized transactions. These modifications included adding unrequested protection plans, creating unauthorized service lines, altering device information, and adjusting rate plans within the AT&T database system. System logs and contemporaneous customer complaints confirm these changes were made without customer knowledge or consent.

Financial analysis of the affected accounts demonstrates that the total pecuniary impact across the documented victims substantially exceeds \$1,000. Account records for [REDACTED] indicate unauthorized charges approximating \$3,100, while [REDACTED] account reflects estimated fraudulent charges between \$4,680 and \$6,120 over the contract period. In the case of [REDACTED] unauthorized system modifications resulted in billing charges of \$1,539.84, representing nearly six times the originally quoted rate.

System logs document deliberate circumvention of security protocols, as evidenced in [REDACTED] account records: "Bypass use of 1-time PIN for AddAuthorizedUser because Initial PIN not received." AT&T's security systems independently identified these activities as potentially fraudulent, with one account noting "Order stopped due to Avertack Fraud alert."

There is a documented pattern of unauthorized computer access and data manipulation across multiple victim accounts over an extended period. The technical nature of these modifications required deliberate computer system access and specialized knowledge of AT&T's systems, with the apparent motivation of financial gain through commission manipulation.

11. That, based on the preceding facts, the Affiant believes there is sufficient probable cause

(This is page 6 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature] 347
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature] 140
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6-27-25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

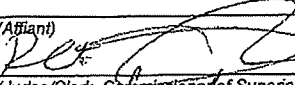
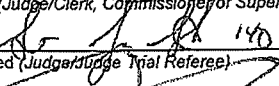
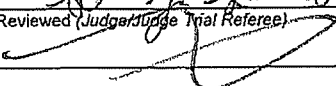
www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

to issue an arrest warrant in the name of Katie Barnaby (DOB: 11/04/1989), last known address of 64 West Street, Apt. A, Stafford, CT, for violation of Connecticut General Statutes.

(This is page 7 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)		577
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)		140
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)		Date 6-27-25

# INFORMATION

JD-CR-71 Rev. 3-11

## STATE OF CONNECTICUT SUPERIOR COURT

Disposition date

Police Case number

CFS#2500017196

Agency name

EDMC-C

Agency number

CSP-400

### Title, Allegation and Counts

State of Connecticut vs. (Name of accused)

Barnaby, Katie

Residence (Town) of accused

Stafford

Docket number

Address

64 West Street, Apt. A

Date of birth

11/04/1989

The undersigned Prosecuting  
Authority of the Superior Court  
of the State of Connecticut  
charges that:

To be held at (Town)

Rockville

Geographical  
area  
number

19

Court date

Count One — Did commit the offense of:

Computer Crimes Third Degree

Continued to

Purpose

Reason

At (Town)

Stafford

On or about (Date)

April 2023-Oct 2023

In violation of General Statute number

53a-254

Count Two — Did commit the offense of:

At (Town)

On or about (Date)

In violation of General Statute number

Count Three — Did commit the offense of:

At (Town)

On or about (Date)

In violation of General Statute number

☐ See other sheet for additional counts

Date

6-18-25

Signed (Prosecuting Authority)

### Court Action

Defendant advised of rights before plea

(Judge)

(Date)

Bond

Surety

☐ 10 %

Election

(Date)

☐ Attorney

☐ Public defender

Guardian

Bond change

☐ Cash

☐ CT

☐ JY

Seized property inventory number

Count	Plea date	Plea	Plea withdrawn		Verdict finding	Fine	Remit	Additional disposition
			Date	New plea				
1						\$	\$	
2						\$	\$	
3						\$	\$	

Date	Other Court Action	Judge

Receipt number	Cost <input type="checkbox"/> IMP <input type="checkbox"/> NCI	Bond information <input type="checkbox"/> Bond forfeited <input type="checkbox"/> Forfeiture vacated <input type="checkbox"/> Forfeiture vacated and bond reinstated
Application fee - receipt number if paid	Circle one W I Q	Program fee - receipt number if paid
Prosecutor on original disposition	Reporter/monitor on original disposition	Signed (Clerk)
		Signed (Judge)

# INFORMATION

JD-CR-71 Rev. 3-11

## STATE OF CONNECTICUT SUPERIOR COURT

Disposition date

Police Case number  
CFS#2500017196

Agency name  
EDMC-C

Agency number  
CSP-400

### Arrest Warrant

Geographical  
area  
number

19

State of Connecticut vs. Barnaby, Katie

To: Any Proper Officer of the State of Connecticut

By Authority of the State of Connecticut, you are hereby commanded to arrest the body of the within-named accused. ("X" all that apply)

- ☐ A. Accused is ordered to be brought before a clerk or assistant clerk of the Superior Court.
- ☐ B. Accused is not entitled to bail.

If A, B or both are checked above, you shall without undue delay bring the arrested person before the clerk or assistant clerk of the Superior Court for the geographical area where the offense is alleged to have been committed, or if the clerk's office is not open, to a community correctional center within said geographical area, or the nearest community correctional center if no such center exists in the geographical area, or to the Correctional Institution, as the case may be.

- ☐ C. Bail set at \_\_\_\_\_
- ☐ D. Non-financial conditions of release:

Extradition boundaries  
established by prosecutor

- ☒ E. Conditions of release not determined by court.

By the Court

Signed (Judge of the Superior Court)

Date

Name of Judge (Print or type)

6-27-25

Richard Russo

### Return On Arrest Warrant

Geographical  
area  
number

19

Town of

Tolland

Date

07/10/25

State of Connecticut

Then and there, by virtue of the within and foregoing complaint and warrant, I arrested the body of the within-named accused and read the same in the hearing of said accused; and have said accused here in court for examination.

Attest (Officer's signature and Department)

Troupe Suppletta # 531

Date

Other Court action

Judge

**ARREST WARRANT APPLICATION**JD-CR-64b Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3**STATE OF CONNECTICUT  
SUPERIOR COURT**  
www.jud.ct.gov

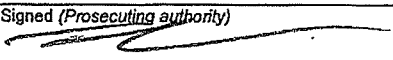
For Court Use Only	
Supporting Affidavits sealed	
<input type="checkbox"/> Yes	<input type="checkbox"/> No

Police Case number <b>CFS#2500017196</b>	Agency name <b>EDMC-C</b>	Agency number <b>CSP-400</b>	
Name (Last, First, Middle Initial) <b>Barnaby, Katie</b>	Residence (Town) of accused <b>Stafford</b>	Court to be held at (Town) <b>Rockville</b>	Geographical Area number <b>19</b>

**Application For Arrest Warrant**

To: A Judge of the Superior Court

The undersigned hereby applies for a warrant for the arrest of the above-named accused on the basis of the facts set forth in the: ☒ Affidavit Below. ☐ Affidavit(s) Attached.

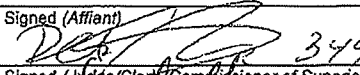
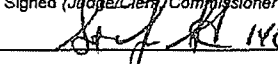
Date <b>6-18-25</b>	Signed (Prosecuting authority) 	Type/print name of prosecuting authority <b>Jonathan Shaw</b>
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**Affidavit**

The undersigned affiant, being duly sworn, deposes and says:

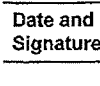
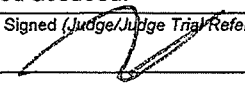
1. The undersigned Affiant, Detective Matthew Hogan #344, being duly sworn, does depose and state that he is a regular sworn member of the Connecticut Department of Emergency Services and Public Protection, Division of State Police, and has been a member of the said department since June 1, 2012. This Affiant presently holds the rank of Detective and is presently assigned to the Eastern District Major Crime Squad, Criminal Investigation Unit, at Troop C in Tolland, Connecticut, who is also duly sworn Special Deputation assigned to the Connecticut Financial Crimes Task Force, United States Secret Service. At all times mentioned herein, the Affiant was acting as an official member of said department. Affiant Hogan has received formal training regarding laws of arrest and laws pertaining to search and seizure from the Connecticut State Police Academy, the Connecticut Municipal Police Officer Standards and Training Council, and has been accredited as a Certified Anti-Money Laundering Specialist by the Associated of Certified Anti-Money Laundering Specialists (ACAMS), Certified Economic Crime Forensic Examiner (CECFE) by the National White Collar Crime Center. The following facts and circumstances are stated from personal knowledge, observation, and investigation, as well as the information received from fellow Troopers/ Police Officers acting in their official capacity, and from official police reports. The knowledge of the facts and circumstances contained hereinafter are the result of the affiant's personal investigative efforts and observations as well as those of other law enforcement officers, acting in their official capacity, who related their findings to this affiant.

(This is page 1 of a 7 page Affidavit.)

Date <b>5/27/25</b>	Signed (Affiant)  <b>344</b>
Jurat <b>5/27/25</b>	Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public)  <b>110</b>

**Finding**

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and Signature 	Signed at (City or town) <b>Vernon/2ndville</b>	On (Date) <b>6/27/25</b>	Signed (Judge/Judge Trial Referee) 	Name of Judge/Judge Trial Referee <b>Richard R. Ivo</b>
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**ARREST WARRANT APPLICATION**

JD-CR-64a Rev. 3-11

C.G.S. § 54-2a

Pr. Bk. Sec. 36-1, 36-2, 36-3

**STATE OF CONNECTICUT  
SUPERIOR COURT**

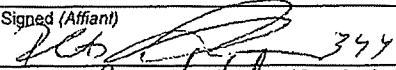
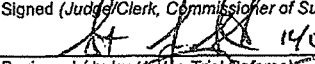
www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

**Affidavit - Continued**

2. That, I make this affidavit in support of an application for a criminal complaint and a warrant to arrest Katie Barnaby (DOB: 11/04/1989) based on evidence obtained in the investigation conducted by the Connecticut State Police Eastern District Major Crime Squad.
3. That, based on the facts set forth below, this Affiant submits that there is probable cause to believe, that Katie Barnaby (DOB: 11/04/1989) knowingly accessed AT&T's computer systems with intent to modify customer account data by adding protection plans, additional lines, and manipulating rate plans without customer consent or business justification. These unauthorized system accesses and data modifications resulted in financial harm to customers. Barnaby knowingly exceeded her authorized access to modify customer account data for personal gain through commission manipulation.
4. That, on 02/27/24, Eastern District Major Crime detectives were assigned to investigate a fraud scheme involving former AT&T employee, Katie Barnaby. In December of 2021, at an AT&T retailer in Stafford, Barnaby allegedly misled a customer by secretly adding unauthorized phone and tablet lines to their account for commission, resulting in approximately \$2,000 in unauthorized charges over a 26-month period. The investigation revealed multiple victims at other AT&T locations. Barnaby was arrested on the strength of an arrest warrant on 01/03/25 and charged with Computer Crimes Third Degree (53a-254) for CFS #2400078263.
5. That, AT&T utilizes two distinct retail distribution models to serve customers: corporate-owned stores and authorized retailers. These different business arrangements have significant implications for consumer experiences, pricing structures, employee incentives, and accountability mechanisms.

(This is page 2 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	 140
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6-27-25



## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11  
C.G.S. § 54-2a  
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

AT&T corporate stores are wholly owned and operated by AT&T Inc. directly. These locations represent the company's official retail presence, with employees who work directly for AT&T as corporate staff members. In contrast, authorized retailers like [REDACTED] (where Barnaby worked) and [REDACTED] are independent businesses that operate under licensing agreements with AT&T. These retailers are essentially franchises or third-party partners that have contracted with AT&T to sell its products and services under the AT&T brand name. While they display AT&T signage and branding that appears nearly identical to corporate locations, they are separately owned businesses.

6. That, upon the press release for Barnaby's arrest under CFS 2400078263, Troop C - Tolland began receiving numerous complaints involving Barnaby. The following is a list of victims, and the AT&T store associated:

- a) 25-17196 [REDACTED] - Stafford AT&T
- b) 25-17372 [REDACTED] - Willimantic AT&T
- c) 25-17198 [REDACTED] - Colchester AT&T
- d) 25-31860 [REDACTED] - Stafford AT&T
- e) 25-17376 [REDACTED] - Stafford AT&T
- f) 25-17377 [REDACTED] - Willimantic AT&T

7. That, on 03/28/25, Affiant Hogan #344 and Det. Picard #712 had a series of search and seizure warrants for the above victims AT&T account records approved by GA19 Rockville Superior Court Judge McNamara. These documents were sent to AT&T's legal department and a response with records was returned on or about 04/16/25.

(This is page 3 of a 7 page Affidavit.)

Date 5/27/25		Signed (Affiant) Det. Hogan #344	
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) [Signature]	
Reviewed (Prosecutorial Official) [Signature]	Date 6-18-25	Reviewed (Judge/Judge Trial Referee) [Signature]	Date 8/27/25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11

C.G.S. § 54-2a

Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

8. That, the following is a summary of the above victim account records and victim statements in order:

- a. [REDACTED] Barnaby accessed AT&T's computer systems in April 2023 to enroll [REDACTED] in a "Business Unlimited Performance" plan containing approximately 12 unauthorized additional lines beyond the 5 he requested. AT&T records document multiple adjustment notations on May 1, 2023, specifically citing: "PROCESS ADJ OF \$388.27 3 LINES WERE ADDED TO THE ACCT WO CX CONSENT AND UPGRADE FEE WAS CHARGE ON A NEWLY CREATED ACCT." Each additional line was configured with unauthorized insurance at approximately \$35 per line. The unauthorized system modifications resulted in bills of \$1,539.84 (nearly six times the quoted rate), leading to multiple account suspensions and eventual cancellation. AT&T's January 2025 internal documentation confirms the account was "BEING RESEARCHED FOR FRAUD."

9. That, along with numerous victim complaint reports to Troop C, there were current and former AT&T employees e-mailing and calling to provide their accounts from around the United States. On or about 01/22/25, Affiant Hogan was contacted by [REDACTED] a prior [REDACTED] AT&T employee based in Michigan who alleged fraud was common practice at [REDACTED] (AT&T authorized retailer). [REDACTED] agreed to provide a sworn written statement to Michigan State Police D/Sgt. Brian Siemen #295 to assist with our investigation. The following is a summary of pertinent facts:

*Former AT&T retail employee [REDACTED] provided testimony to Michigan State Police on January 22, 2025, that corroborates the systematic nature of the fraudulent practices observed in the Connecticut investigation. [REDACTED] stated that during his two-month employment at an AT&T authorized retailer from October to December 2024, he was explicitly instructed by multiple managers to add unauthorized services to customer*

(This is page 4 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature] 394
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature]
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6/22/25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11

C.G.S. § 54-2a

Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

*accounts without knowledge or consent.*

According to [REDACTED] store managers directed employees to add three specific services -- Turbo (\$7), Next Up (\$10-\$14), and insurance (\$14-\$17) --to every customer's account and every phone line, even for customers who merely entered the store to make payments. Management justified this practice by explaining that if customers noticed and complained, the charges would simply be credited back while the employee still received the commission. [REDACTED] further testified that when customers discovered these unauthorized additions and returned to the store to have them removed, employees were instructed to falsely claim they couldn't remove the services and to direct customers to call customer service after 48 hours, despite having the ability to remove them immediately. This delay tactic was designed to ensure the services remained on accounts long enough to qualify for commission metrics.

[REDACTED] identified that this practice was driven by AT&T's commission structure, which rewarded employees with bonuses ranging from \$300 to \$3,000 monthly for achieving a 90% close rate on these services. His testimony specifically cited an incident involving a customer named Adam who explicitly declined the Next Up service multiple times, but had added it to his account anyway at management's insistence, which ultimately led to [REDACTED] resignation on December 9, 2024. (This witness statement provides relevant context demonstrating that the fraudulent practices identified in the Connecticut investigation may represent a broader pattern within AT&T's sales operations rather than isolated incidents.)

10. That, an examination of Barnaby's conduct at the AT&T retail locations reveals that between December 2021 and December 2023, Barnaby engaged in systematic misuse of AT&T's computer systems, accessing and modifying customer account data without proper authorization from the account holders.

(This is page 5 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature] 347
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature] 140
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6/22/25

**ARREST WARRANT APPLICATION**

JD-CR-64a Rev. 3-11

C.G.S. § 54-2a

Pr. Bk. Sec. 36-1, 36-2, 36-3

**STATE OF CONNECTICUT  
SUPERIOR COURT**

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Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

**Affidavit - Continued**

Barnaby utilized her legitimate system access credentials to make unauthorized modifications to customer accounts following the completion of initial authorized transactions. These modifications included adding unrequested protection plans, creating unauthorized service lines, altering device information, and adjusting rate plans within the AT&T database system. System logs and contemporaneous customer complaints confirm these changes were made without customer knowledge or consent.

Financial analysis of the affected accounts demonstrates that the total pecuniary impact across the documented victims substantially exceeds \$1,000. Account records for [REDACTED] indicate unauthorized charges approximating \$3,100, while [REDACTED] account reflects estimated fraudulent charges between \$4,680 and \$6,120 over the contract period. In the case of [REDACTED] unauthorized system modifications resulted in billing charges of \$1,539.84, representing nearly six times the originally quoted rate.

System logs document deliberate circumvention of security protocols, as evidenced in [REDACTED] account records: "Bypass use of 1-time PIN for AddAuthorizedUser because Initial PIN not received." AT&T's security systems independently identified these activities as potentially fraudulent, with one account noting "Order stopped due to Avertack Fraud alert."

There is a documented pattern of unauthorized computer access and data manipulation across multiple victim accounts over an extended period. The technical nature of these modifications required deliberate computer system access and specialized knowledge of AT&T's systems, with the apparent motivation of financial gain through commission manipulation.

11. That, based on the preceding facts, the Affiant believes there is sufficient probable cause

(This is page 6 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	[Signature] 349
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	[Signature] 140
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6/27/25

## ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11

C.G.S. § 54-2a

Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT  
SUPERIOR COURT

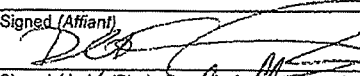
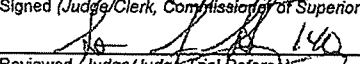
www.jud.ct.gov

Name (Last, First, Middle Initial)	Residence (Town) of accused	Court to be held at (Town)	Geographical Area number
Barnaby, Katie	Stafford	Rockville	19

## Affidavit - Continued

to issue an arrest warrant in the name of Katie Barnaby (DOB: 11/04/1989), last known address of 64 West Street, Apt. A, Stafford, CT, for violation of Connecticut General Statutes.

(This is page 7 of a 7 page Affidavit.)

Date	5/27/25	Signed (Affiant)	 394
Jurat	Subscribed and sworn to before me on (Date) 5/27/25	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	 140
Reviewed (Prosecutorial Official)	Date 6-18-25	Reviewed (Judge/Judge Trial Referee)	Date 6/27/25