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Description of document:	Federal Communications Commission (FCC) Inspector General (OIG) Administrative Subpoenas for Closed Cases, January-November 2017
Requested date:	14-October-2019
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Source of document:	Freedom of Information Act Request Federal Communications Commission Inspector General 445 12th Street, SW, Room 1-A836 Washington, D.C. 20554

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Federal Communications Commission
Washington, D.C. 20554

November 19, 2019

Re: FOIA Control No. 2020-000030

This letter responds to your Freedom of Information Act (FOIA) request for a copy of each administrative subpoena issued by the FCC Office of Inspector General since January 1, 2017, which you agreed to limit to only those subpoenas involving closed cases. Furthermore, you agreed to request only the first page of each subpoena, along with the pages of the subpoenas reflecting documents requested by OIG.

OIG located 38 responsive subpoenas, identified responsive pages, and enclosed. As indicated on the subpoenas, certain material has been redacted pursuant to FOIA exemptions 6 and 7(C).¹

FOIA Exemption 6 protects "personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy."² Balancing the public's right to disclosure against the individual's right to privacy, we have determined release of this information would constitute a clearly unwarranted invasion of personal privacy. The redacted information includes the names and identifying information of individuals who were the subjects of our investigations, as well as names of investigators. We have determined it is reasonably foreseeable disclosure would harm the privacy interest of the persons mentioned in these records, which Exemption 6 is intended to protect.

FOIA Exemption 7(C) protects "records or information compiled for law enforcement purposes [the production of which] could reasonably be expected to constitute an unwarranted invasion of personal privacy."³ Balancing the public's right to disclosure against the individual's right to privacy, we have determined release of this information would constitute an unwarranted invasion of personal privacy. The redacted information includes the names and identifying information of individuals who were the subjects of our investigations, as well as names of individuals who were/are employed at this agency. These names were compiled during the course of our investigations and in instances such as this, the balance favors not releasing these names. We have determined it is reasonably foreseeable disclosure would harm the Commission or the Federal government's law enforcement activities, which Exemption 7 is intended to protect.

The FOIA requires that "any reasonably segregable portion of a record" must be released after appropriate application of the Act's exemptions.⁴ However, when nonexempt information is

¹ 5 U.S.C. § 552(b)(6), 7(C).

² 5 U.S.C. § 552(b)(6).

³ 5 U.S.C. § 552(b)(7)(C).

⁴ 5 U.S.C. § 552(b) (sentence immediately following exemptions).

“inextricably intertwined” with exempt information, reasonable segregation is not possible.⁵ The redactions and/or withholdings made are consistent with our responsibility to determine if any segregable portions can be released. To the extent non-exempt material is not released, it is inextricably intertwined with exempt material.

We also reviewed the responsive documents to determine if discretionary release is appropriate.⁶ The materials protected from disclosure under Exemption 6 are not appropriate for discretionary release in light of the personal privacy interests involved. The materials protected from disclosure under Exemption 7 are not appropriate for discretionary release in light of the law enforcement sensitivities involved.

You may seek review by filing an application for review with the Office of General Counsel. An application for review must be *received* by the Commission within 90 calendar days of the date of this letter.⁷ You may file an application for review by mailing the application to Federal Communications Commission, Office of General Counsel, 445 12th St SW, Washington, DC 20554, or you may file your application for review electronically by e-mailing it to FOIA-Appeal@fcc.gov. Please caption the envelope (or subject line, if via e-mail) and the application itself as “Review of Freedom of Information Action.”

If you would like to discuss this response before filing an application for review to attempt to resolve your dispute without going through the appeals process, you may contact the Commission’s FOIA Public Liaison for assistance at:

FOIA Public Liaison
Federal Communications Commission, Office of the Managing Director, Performance
Evaluation and Records Management
445 12th St SW, Washington, DC 20554
202-418-0440
FOIA-Public-Liaison@fcc.gov

If you are unable to resolve your FOIA dispute through the Commission’s FOIA Public Liaison, the Office of Government Information Services (OGIS), the Federal FOIA Ombudsman’s office, offers mediation services to help resolve disputes between FOIA requesters and Federal agencies. The contact information for OGIS is:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road-OGIS
College Park, MD 20740-6001
202-741-5770
877-684-6448
ogis@nara.gov
ogis.archives.gov

⁵ *Mead Data Cent. Inc. v. Dep’t of the Air Force*, 566 F.2d 242, 260 (D.C. Cir. 1977).

⁶ See President’s Memorandum for the Heads of Executive Departments and Agencies, Freedom of Information Act, 74 Fed. Reg. 4683 (2009).

⁷ 47 C.F.R. §§ 0.461(j), 1.115; 47 C.F.R. § 1.7 (documents are considered filed with the Commission upon their receipt at the location designated by the Commission).

Sincerely,

A handwritten signature in black ink, appearing to read "Sharon R. Diskin". The signature is fluid and cursive, with a long horizontal line extending from the left side.

Sharon R. Diskin
Assistant Inspector General-
Investigations

Enclosure
cc: FCC FOIA Office



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

February 23, 2017

VIA CERTIFIED US MAIL RETURN RECEIPT REQUESTED

TalkSouth, Inc.
41 Fieldstone
Hattiesburg, MS 39402

ATTN: (b) (7)(C), (b) (6)

RE: Federal Communications Commission Inspector General Subpoena

Dear (b) (7)(C), (b) (6)

Enclosed please find a *Subpoena Duces Tecum* issued by this office to TalkSouth, Inc. We request that you not disclose the existence of or compliance with this subpoena to third parties for an indefinite period of time or until this office notifies you that any investigation connected to this subpoena has been completed.

(b) (7)(C), (b) (6)

Sincerely,

(b) (7)(C), (b) (6)

Enclosure

without limitation, offices maintained in homes of employees and offices and storage facilities in any remote locations.

- D. If there are no Documents responsive to a particular subpoena request, provide a certification to that effect.
- E. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.
- F. Production in response to this subpoena is sought in electronic format. We prefer to receive documents on electronic media rather than paper. *See Appendix A.*

SECTION III – REQUESTED DOCUMENTS

- A. All Documents indicating, or in lieu thereof, a sworn statement that shows:
 - 1. Each current owner of the Company, both direct and indirect.
 - 2. The ownership interest of each current owner of the Company, both direct and indirect.
 - 3. Each prior owner of the Company, both direct and indirect.
 - 4. The ownership interest of each prior owner of the Company, both direct and indirect.
 - 5. The dates each ownership interest of the Company was acquired, transferred or sold, both direct and indirect.
- B. All Documents indicating, or in lieu thereof, a sworn statement that shows the Company's organization and the Company's officers and directors, including, where applicable, any associated Documents that contain the names, titles and job description/duties of the Company's officers and directors.

- C. All Documents indicating the Company's certificate(s) of incorporation or certificate(s) of formation, as well as the Company's original and revised articles of organization.
- D. All Documents indicating or, in lieu thereof, a sworn statement that shows each affiliate of the Company and the relationship of each affiliate to the Company.
- E. All Documents showing the services provided by the Company or, in lieu thereof, a sworn statement that lists the services provided by the Company.
- F. All Documents constituting agreements between the Company and telecommunications services providers or providers of telecommunications.
 - 1. All Documents related to agreements, including oral agreements, between the Company and telecommunications service providers or providers of telecommunications.
- G. All Documents constituting agreements between the Company and other entities or individuals who promote, solicit, and/or sell telecommunications or telecommunications services to HCPs.
 - 1. All Documents related to agreements, including oral agreements, between the Company and other entities or individuals who promote, solicit, and/or sell telecommunications or telecommunications services to HCPs.
- H. All Documents, not otherwise previously provided, that reference or relate to Harrison & Howard Advisors, LLC.
- I. All Documents, not otherwise previously provided, that reference or relate to Healthcare Connect United, LLC.
- J. All Documents, not otherwise previously provided, that reference or relate to DataConnex, LLC.
- K. All Documents, not otherwise provided, that reference or relate to Communications Consulting Services, Inc. and/or (b) (7)(C), (b) (6)



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

February 23, 2017

VIA CERTIFIED US MAIL RETURN RECIEPT REQUESTED

Healthcare Connect United, LLC
2 Forest Hills Ridge Court
Chesterfield, MO 63005

ATTN: (b) (7)(C), (b) (6)

RE: Federal Communications Commission Inspector General Subpoena

Dear (b) (7)(C), (b) (6)

Enclosed please find a *Subpoena Duces Tecum* issued by this office to Healthcare Connect United, LLC. **We request that you not disclose the existence of or compliance with this subpoena to third parties for an indefinite period of time or until this office notifies you that any investigation connected to this subpoena has been completed.**

(b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

Enclosure

by third parties at the direction of the Company. This search must include all offices, including, without limitation, offices maintained in homes of employees and offices and storage facilities in any remote locations.

- D. If there are no Documents responsive to a particular subpoena request, provide a certification to that effect.
- E. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.
- F. Production in response to this subpoena is sought in electronic format. We prefer to receive documents on electronic media rather than paper. *See Appendix A.*

SECTION III – REQUESTED DOCUMENTS

- A. All Documents indicating, or in lieu thereof, a sworn statement that shows:
 - 1. Each current owner of the Company, both direct and indirect.
 - 2. The ownership interest of each current owner of the Company, both direct and indirect.
 - 3. Each prior owner of the Company, both direct and indirect.
 - 4. The ownership interest of each prior owner of the Company, both direct and indirect.
 - 5. The dates each ownership interest of the Company was acquired, transferred or sold, both direct and indirect.
- B. All Documents indicating, or in lieu thereof, a sworn statement that shows the Company's organization and the Company's officers and directors, including, where

applicable, any associated Documents that contain the names, titles and job description/duties of the Company's officers and directors.

- C. All Documents indicating the Company's certificate(s) of incorporation or certificate(s) of formation, as well as the Company's original and revised articles of organization.
- D. All Documents indicating or, in lieu thereof, a sworn statement that shows each affiliate of the Company and the relationship of each affiliate to the Company.
- E. All Documents showing the services provided by the Company or, in lieu thereof, a sworn statement that lists the services provided by the Company.
- F. All Documents used to market the Company's services to HCPs.
- G. All Documents used to market the Company's services to entities other than HCPs.
- H. All Documents constituting Letters of Agency or Letters of Agreement between the Company and HCPs.
- I. All Documents constituting agreements between the Company and telecommunications services providers or providers of telecommunications.
 - 1. All Documents related to agreements, including oral agreements, between the Company and telecommunications service providers or providers of telecommunications.
- J. All Documents constituting agreements between the Company and other entities or individuals who promote, solicit, and/or sell telecommunications or telecommunications services to HCPs.
 - 1. All Documents related to agreements, including oral agreements, between the Company and other entities or individuals who promote, solicit, and/or sell telecommunications or telecommunications services to HCPs.
- K. All Documents constituting invoices, billing statements, or other request for payment from the Company to HCPs.
- L. All Documents constituting invoices, billing statements, or other request for payment related to the Rural Health Care Program from the Company to entities other than HCPs.
- M. All Documents related to the Company's filing of FCC Form 465 on behalf of HCPs, including, but not limited to requests for proposals, bidding submissions, and bidding matrices used to select service providers.

- N. All Documents related to the Company's filing of FCC Form 461 on behalf of HCPs, including, but not limited to requests for proposals, bidding submissions, and bidding matrices used to select service providers.
- O. All Documents related to the Company's filing of FCC Form 466 on behalf of HCPs.
- P. All Documents related to the Company's filing of FCC Form 462 on behalf of HCPs.
- Q. All Documents, not otherwise previously provided, that reference or relate to Harrison & Howard Advisors, LLC.
- R. All Documents, not otherwise previously provided, that reference or relate to DataConnex, LLC.
- S. All Documents, not otherwise previously provided, that reference or relate to TalkSouth, Inc.
- T. All Documents, not otherwise provided, that reference or relate to (b) (7)(C), (b) (6) and/or (b) (7)(C), (b) (6)
- U. All Documents, not otherwise provided, that reference or relate to Communications Consulting Services, Inc. and/or (b) (7)(C), (b) (6)

Failure to obey this subpoena shall be enforceable by order of the appropriate United States District Court.

Issued by: David L. Hunt Date: 2/23/17
David L. Hunt
Inspector General
Federal Communications Commission



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

February 23, 2017

VIA CERTIFIED US MAIL RETURN RECEIPT REQUESTED

Harrison & Howard Advisors LLC
2 Forest Hills Ridge Court
Chesterfield, MO 63005

ATTN: (b) (7)(C), (b) (6)

RE: Federal Communications Commission Inspector General Subpoena

Dear (b) (7)(C), (b) (6)

Enclosed please find a *Subpoena Duces Tecum* issued by this office to Harrison & Howard Advisors, LLC. **We request that you not disclose the existence of or compliance with this subpoena to third parties for an indefinite period of time or until this office notifies you that any investigation connected to this subpoena has been completed.**

(b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

Enclosure

information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.

F. Production in response to this subpoena is sought in electronic format. We prefer to receive documents on electronic media rather than paper.

SECTION III - REQUESTED DOCUMENTS

- A. All Documents indicating, or in lieu thereof, a sworn statement that shows:
 - a. Each current owner of the Company, both direct and indirect.
 - b. The ownership interest of each current owner of the Company, both direct and indirect.
 - c. Each prior owner of the Company, both direct and indirect.
 - d. The ownership interest of each prior owner of the Company, both direct and indirect.
 - e. The dates each ownership interest of the Company was acquired, transferred or sold, both direct and indirect.
- B. All Documents indicating, or in lieu thereof, a sworn statement that shows the Company's organization and the Company's officers, directors, employees and/or independent contractors including, where applicable, any associated documents that contain the names, titles and job description/duties of such individuals.
- C. All Documents indicating the Company's certificate(s) of incorporation or certificate(s) of formation, as well as the Company's original and revised articles of organization.
- D. All Documents indicating or, in lieu thereof, a sworn statement that shows each affiliate of the Company and the relationship of each affiliate to the Company.
- E. All Documents that reference or relate to DataConnex, LLC.
- F. All Documents that reference or relate to Healthcare Connect United LLC.
- G. All Documents that reference or relate to Communications Consulting Services, Inc. and/or (b) (7)(C), (b) (6)
- H. All Documents that reference or relate to TalkSouth, Inc. and/or (b) (7)(C), (b) (6) and/or (b) (7)(C), (b) (6)



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

February 23, 2017

VIA CERTIFIED US MAIL RETURN RECIEPT REQUESTED

DataConnex, LLC
710 Oakfield Drive, Suite 227
Brandon, FL 33511

ATTN: (b) (7)(C), (b) (6)

RE: Federal Communications Commission Inspector General Subpoena

Dear (b) (7)(C), (b) (6)

Enclosed please find a *Subpoena Duces Tecum* issued by this office to DataConnex, LLC. **We request that you not disclose the existence of or compliance with this subpoena to third parties for an indefinite period of time or until this office notifies you that any investigation connected to this subpoena has been completed.**

If you have any questions, please contact (b) (7)(C), (b) (6) at (b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

Enclosure

actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.

- F. Production in response to this subpoena is sought in electronic format. We prefer to receive documents on electronic media rather than paper.

G. SECTION III - REQUESTED DOCUMENTS

- A. All Documents indicating, or in lieu thereof, a sworn statement that shows:
- a. Each current owner of the Company, both direct and indirect.
 - b. The ownership interest of each current owner of the Company, both direct and indirect.
 - c. Each prior owner of the Company, both direct and indirect.
 - d. The ownership interest of each prior owner of the Company, both direct and indirect.
 - e. The dates each ownership interest of the Company was acquired, transferred or sold, both direct and indirect.
- B. All Documents indicating, or in lieu thereof, a sworn statement that shows each Affiliate of the Company and the relationship of each Affiliate to the Company.
- C. All Documents that reference or relate to TalkSouth, Inc.
- D. All Documents that reference or relate to Communications Consulting Services, Inc. and/or (b) (7)(C), (b) (6)
- E. All Documents that reference or relate to Healthcare Connect United LLC, and/or (b) (7)(C), (b) (6)
- F. All Documents that reference or relate to Harrison & Howard Advisors, LLC.



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

February 23, 2017

VIA CERTIFIED US MAIL RETURN RECIEPT REQUESTED

Communications Consulting Services, Inc.
15 King Edward Drive
Columbus, MS 39705

ATTN: (b) (7)(C), (b) (6)

RE: Federal Communications Commission Inspector General Subpoena

Dear (b) (7)(C), (b) (6)

Enclosed please find a *Subpoena Duces Tecum* issued by this office to Communications Consulting Services, Inc. **We request that you not disclose the existence of or compliance with this subpoena to third parties for an indefinite period of time or until this office notifies you that any investigation connected to this subpoena has been completed.**

If you have any questions, please contact (b) (7)(C), (b) (6)
(b) (7)(C), (b) (6) at (b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

Enclosure

memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.

- F. Production in response to this subpoena is sought in electronic format. We prefer to receive documents on electronic media rather than paper. *See* Appendix A.

SECTION III – REQUESTED DOCUMENTS

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- C. All Documents indicating the Company's certificate(s) of incorporation or certificate(s) of formation, as well as the Company's original and revised articles of organization.
- D. All Documents indicating or, in lieu thereof, a sworn statement that shows each affiliate of the Company and the relationship of each affiliate to the Company.
- E. All Documents showing the services provided by the Company or, in lieu thereof, a sworn statement that lists the services provided by the Company.
- F. All Documents used to market the Company's services to HCPs.
- G. All Documents used to market the Company's services to entities other than HCPs.

- H. All Documents constituting Letters of Agency or Letters of Agreement between the Company and HCPs.
- I. All Documents constituting agreements between the Company and telecommunications services providers or providers of telecommunications.
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U. All Documents, not otherwise provided, that reference or relate to Healthcare Connect United, LLC and/or (b) (7)(C), (b) (6)

Failure to obey this subpoena shall be enforceable by order of the appropriate United States District Court.

Issued by: David L. Hunt Date: 2/28/17
David L. Hunt *by David L. Hunt*
Inspector General *AT&T*
Federal Communications Commission



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

March 21, 2017

VIA CERTIFIED US MAIL RETURN RECEIPT REQUESTED

Aptus Telecom LLC
7379 US Highway 98
Hattiesburg, MS 39402

ATTN: (b) (7)(C), (b) (6)

RE: Federal Communications Commission Inspector General Subpoena

Dear (b) (7)(C), (b) (6)

Enclosed please find a *Subpoena Duces Tecum* issued by this office to Aptus Telecom LLC. **We request that you not disclose the existence of or compliance with this subpoena to third parties for an indefinite period of time or until this office notifies you that any investigation connected to this subpoena has been completed.**

If you have any questions, please contact (b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

Enclosure

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- F. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.
- G. Production in response to this subpoena is sought in electronic format. We prefer to receive documents on electronic media rather than paper. *See* Appendix A.

SECTION III – REQUESTED DOCUMENTS

- A. All Documents indicating, or in lieu thereof, a sworn statement that shows:
 - 1. Each current owner of the Company, both direct and indirect.
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 - 3. Each prior owner of the Company, both direct and indirect.
 - 4. The ownership interest of each prior owner of the Company, both direct and indirect.
 - 5. The dates each ownership interest of the Company was acquired, transferred or sold, both direct and indirect.
- B. All Documents indicating, or in lieu thereof, a sworn statement that shows the Company's organization and the Company's officers and directors, including, where applicable, any associated Documents that contain the names, titles and job description/duties of the Company's officers and directors.

- C. All Documents indicating the Company's certificate(s) of incorporation or certificate(s) of formation, as well as the Company's original and revised articles of organization.
- D. All Documents indicating or, in lieu thereof, a sworn statement that shows each affiliate of the Company and the relationship of each affiliate to the Company.
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 - 1. All Documents related to agreements, including oral agreements, between the Company and telecommunications service providers or providers of telecommunications.
- G. All Documents constituting agreements between the Company and other entities or individuals who promote, solicit, and/or sell telecommunications or telecommunications services to HCPs.
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- I. All Documents, not otherwise previously provided, that reference or relate to Healthcare Connect United, LLC.
- J. All Documents, not otherwise previously provided, that reference or relate to DataConnex, LLC.
- K. All Documents, not otherwise provided, that reference or relate to Communications Consulting Services, Inc. and/or (b) (7)(C), (b) (6)
- L. All Documents, not otherwise provided, that reference or relate to TalkSouth, Inc.
- M. All Documents, not otherwise provided, that reference or relate to EP3 Consulting LLC.



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

April 21, 2017

TO: (b) (7)(C), (b) (6)
Sikeston Medical Clinic
200 Southland Drive
Sikeston, MO 63801

You are hereby commanded to produce documents to the attention of Jay Keithley, Assistant Inspector General for Investigations, Federal Communications Commission, Office of the Inspector General, 445 12th Street, S.W., Washington, D.C., 20554, by the 22nd of May, 2017 at 5:00 p.m. This subpoena is issued to you under the authority of section 6(a) (4) of the Inspector General Act of 1978, 5 U.S.C. App. 3, as amended. Failure to comply with this subpoena may subject you to criminal penalties. You are hereby ordered to produce at such time and place the following as defined and instructed below.

SECTION 1 – DEFINITIONS

- A. "Affiliate" is any person or entity (including any company) that, at any time during the period covered by this subpoena, directly or indirectly, controls, is controlled by or is under common control with the Company as well as, in the case of an entity, its d/b/a, predecessor-in-interest or successor-in-interest. For clarity, "Affiliate" includes all parent entities and subsidiaries of the Company and all entities owned or under control of any owner of the Company.
- B. "Document(s)" means any written, recorded or graphic matter of any nature, regardless of how recorded and whether original or copy, including, but not limited to: documents; correspondence; memoranda; notes; drafts; records; letters; envelopes; telegrams; cables;

- F. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.
- G. Production in response to this subpoena is sought in electronic format. We prefer to receive documents on electronic media rather than paper. *See Appendix A.*

SECTION III – REQUESTED DOCUMENTS

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Failure to obey this subpoena shall be enforceable by order of the appropriate United States District Court.

Issued by: David L. Hunt Date: 4/21/17
by Angie Keithley
David L. Hunt
Inspector General
Federal Communications Commission



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

April 21, 2017

TO: (b) (7)(C), (b) (6)
SEMO Health Network – Sikeston Dental Center
220 Southland Drive
Sikeston, MO 63801

You are hereby commanded to produce documents to the attention of Jay Keithley, Assistant Inspector General for Investigations, Federal Communications Commission, Office of the Inspector General, 445 12th Street, S.W., Washington, D.C., 20554, by the 22nd of May, 2017 at 5:00 p.m. This subpoena is issued to you under the authority of section 6(a) (4) of the Inspector General Act of 1978, 5 U.S.C. App. 3, as amended. Failure to comply with this subpoena may subject you to criminal penalties. You are hereby ordered to produce at such time and place the following as defined and instructed below.

SECTION 1 – DEFINITIONS

- A. "Affiliate" is any person or entity (including any company) that, at any time during the period covered by this subpoena, directly or indirectly, controls, is controlled by or is under common control with the Company as well as, in the case of an entity, its d/b/a, predecessor-in-interest or successor-in-interest. For clarity, "Affiliate" includes all parent entities and subsidiaries of the Company and all entities owned or under control of any owner of the Company.
- B. "Document(s)" means any written, recorded or graphic matter of any nature, regardless of how recorded and whether original or copy, including, but not limited to: documents; correspondence; memoranda; notes; drafts; records; letters; envelopes; telegrams; cables;

- F. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.
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Failure to obey this subpoena shall be enforceable by order of the appropriate United States District Court.

Issued by: David L. Hunt Date: 4/21/17
David L. Hunt
Inspector General
Federal Communications Commission



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

April, 21, 2017

VIA CERTIFIED US MAIL RETURN RECIEPT REQUESTED

Pecos County Memorial Hospital
387 West IH-10
Fort Stockton, TX 79735

ATTN: (b) (7)(C), (b) (6)

RE: Federal Communications Commission Inspector General Subpoena

Dear (b) (7)(C), (b) (6)

Enclosed please find a *Subpoena Duces Tecum* issued by this office to Pecos County Memorial Hospital. **We request that you not disclose the existence of or compliance with this subpoena to third parties for an indefinite period of time or until this office notifies you that any investigation connected to this subpoena has been completed.**

If you have any questions, please (b) (7)(C), (b) (6)

Sincerely,

(b) (7)(C), (b) (6)

Enclosure

- E. If there are no Documents responsive to a particular subpoena request, provide a certification to that effect.
- F. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.
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Issued by: David L. Hunt Date: 4/21/17
David L. Hunt
Inspector General
Federal Communications Commission



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

April 21, 2017

TO: (b) (7)(C), (b) (8)
SEMO Health Network – Otto Bean Dental Center
500 Russell Street
Kennett, MO 63857

You are hereby commanded to produce documents to the attention of Jay Keithley, Assistant Inspector General for Investigations, Federal Communications Commission, Office of the Inspector General, 445 12th Street, S.W., Washington, D.C., 20554, by the 22nd of May, 2017 at 5:00 p.m. This subpoena is issued to you under the authority of section 6(a) (4) of the Inspector General Act of 1978, 5 U.S.C. App. 3, as amended. Failure to comply with this subpoena may subject you to criminal penalties. You are hereby ordered to produce at such time and place the following as defined and instructed below.

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- F. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.
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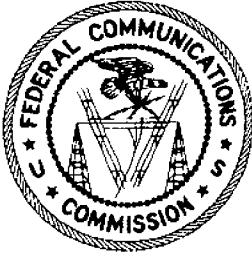
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Failure to obey this subpoena shall be enforceable by order of the appropriate United States District Court.

Issued by: David L. Hunt Date: 4/21/17
by Lay Keithley
David L. Hunt
Inspector General
Federal Communications Commission



**UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL**

SUBPOENA DUCES TECUM

April 21, 2017

TO: [REDACTED]
New Madrid Medical Clinic
421 Line St.
Madrid, MO 63869

You are hereby commanded to produce documents to the attention of Jay Keithley, Assistant Inspector General for Investigations, Federal Communications Commission, Office of the Inspector General, 445 12th Street, S.W., Washington, D.C., 20554, by the 22nd of May, 2017 at 5:00 p.m. This subpoena is issued to you under the authority of section 6(a) (4) of the Inspector General Act of 1978, 5 U.S.C. App. 3, as amended. Failure to comply with this subpoena may subject you to criminal penalties. You are hereby ordered to produce at such time and place the following as defined and instructed below.

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Issued by: David L. Hunt. Date: 4/21/17
by Mythalee
David L. Hunt
Inspector General
Federal Communications Commission



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

April, 21, 2017

VIA CERTIFIED US MAIL RETURN RECEIPT REQUESTED

Kiowa District Hospital
1002 South 4th Street
Kiowa, KS 67070

ATTN: (b) (7)(C), (b) (6)

RE: Federal Communications Commission Inspector General Subpoena

Dear (b) (7)(C), (b) (6)

Enclosed please find a *Subpoena Duces Tecum* issued by this office to Kiowa District Hospital. **We request that you not disclose the existence of or compliance with this subpoena to third parties for an indefinite period of time or until this office notifies you that any investigation connected to this subpoena has been completed.**

(b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

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Issued by: David L. Hunt by Keith Ashley Date: 4/21/17
David L. Hunt
Inspector General
Federal Communications Commission



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

April 21, 2017

TO: (b) (7)(C), (b) (6)
SEMO Health Network – Hayti Medical Center
223 South Third Street
Hayti, MO 63851

You are hereby commanded to produce documents to the attention of Jay Keithley, Assistant Inspector General for Investigations, Federal Communications Commission, Office of the Inspector General, 445 12th Street, S.W., Washington, D.C., 20554, by the 22nd of May, 2017 at 5:00 p.m. This subpoena is issued to you under the authority of section 6(a) (4) of the Inspector General Act of 1978, 5 U.S.C. App. 3, as amended. Failure to comply with this subpoena may subject you to criminal penalties. You are hereby ordered to produce at such time and place the following as defined and instructed below.

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Failure to obey this subpoena shall be enforceable by order of the appropriate United States District Court.

Issued by: David L. Hunt Date: 4/21/17
by Jay Kirtley
David L. Hunt
Inspector General
Federal Communications Commission



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

April 21, 2017

TO: (b) (7)(C), (b) (6)
SEMO Health Network – Hayti Dental Center
214 East Main Street
Hayti, MO 63851

You are hereby commanded to produce documents to the attention of Jay Keithley, Assistant Inspector General for Investigations, Federal Communications Commission, Office of the Inspector General, 445 12th Street, S.W., Washington, D.C., 20554, by the 22nd of May, 2017 at 5:00 p.m. This subpoena is issued to you under the authority of section 6(a) (4) of the Inspector General Act of 1978, 5 U.S.C. App. 3, as amended. Failure to comply with this subpoena may subject you to criminal penalties. You are hereby ordered to produce at such time and place the following as defined and instructed below.

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Failure to obey this subpoena shall be enforceable by order of the appropriate United States District Court.

Issued by: David L. Hunt Date: 4/21/17
by Jay Kei Hulley
David L. Hunt
Inspector General
Federal Communications Commission



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

April 21, 2017

TO: (b) (7)(C), (b) (6)
SEMO Health Network – East Prairie Dental Center
111 Prairie Drive
East Prairie, MO 63845

You are hereby commanded to produce documents to the attention of Jay Keithley, Assistant Inspector General for Investigations, Federal Communications Commission, Office of the Inspector General, 445 12th Street, S.W., Washington, D.C., 20554, by the 22nd of May, 2017 at 5:00 p.m. This subpoena is issued to you under the authority of section 6(a) (4) of the Inspector General Act of 1978, 5 U.S.C. App. 3, as amended. Failure to comply with this subpoena may subject you to criminal penalties. You are hereby ordered to produce at such time and place the following as defined and instructed below.

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Issued by: David L. Hunt Date: 4/21/17
by by Kerthley
David L. Hunt
Inspector General
Federal Communications Commission



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

April 21, 2017

TO: (b) (7)(C), (b) (6)
SEMO Health Network - Bernie Medical Center
741 S. Walnut Street
Bernie, MO 63822

You are hereby commanded to produce documents to the attention of Jay Keithley, Assistant Inspector General for Investigations, Federal Communications Commission, Office of the Inspector General, 445 12th Street, S.W., Washington, D.C., 20554, by the 22nd of May, 2017 at 5:00 p.m. This subpoena is issued to you under the authority of section 6(a) (4) of the Inspector General Act of 1978, 5 U.S.C. App. 3, as amended. Failure to comply with this subpoena may subject you to criminal penalties. You are hereby ordered to produce at such time and place the following as defined and instructed below.

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Issued by: David L. Hunt Date: 4/21/17
by Sydney H. Hunt
David L. Hunt
Inspector General
Federal Communications Commission



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

April 21, 2017

TO: (b) (7)(C), (b) (6)
SEMO Health Network – Benton Medical Center
6724 Hwy 77 East
Benton, MO 63736

You are hereby commanded to produce documents to the attention of Jay Keithley, Assistant Inspector General for Investigations, Federal Communications Commission, Office of the Inspector General, 445 12th Street, S.W., Washington, D.C., 20554, by the 22nd of May, 2017 at 5:00 p.m. This subpoena is issued to you under the authority of section 6(a) (4) of the Inspector General Act of 1978, 5 U.S.C. App. 3, as amended. Failure to comply with this subpoena may subject you to criminal penalties. You are hereby ordered to produce at such time and place the following as defined and instructed below.

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Issued by: David L. Hunt Date: 4/21/17
by by Keithley
David L. Hunt
Inspector General
Federal Communications Commission

into easily understandable form; laptop computers issued to officers and employees; and, any preliminary versions, drafts or revisions of any of the foregoing.

J. **“Lifeline”** or the **“Low Income Program”** means the component of the Universal Service Fund set forth in 47 C.F.R. Part 54, Subpart E.

K. **“NLAD”** means the National Lifeline Accountability Database, established by USAC pursuant to 47 CFR §54.404.

L. **“Primary Agent”** means any entity that has the authority through a contract or a similar arrangement with the Company to provide the Company with Agents. For example, a Primary Agent may be an entity that gives its employees the authority to act as Agents, contracts with individuals to act as Agents or sub-contracts out work to an independent Sub-Contractor Agent.

M. **“Sub-Contractor Agent”** means any entity that, through a contract or a similar arrangement with a Primary Agent or another Sub-Contractor Agent, has the authority to hire or contract with individuals to act as Agents. Such entity may also have the authority to sub-contract out work to another Sub-Contractor Agent.

N. **“USAC”** means the Universal Service Administrative Company.

O. **“Subpoena”** means the subpoena to which this appendix is attached as well as all its appendixes and other attachments.

P. **“USF”** is the Universal Service Fund, a federal program implemented pursuant to 47 U.S.C. §254.

SECTION III – REQUESTED DOCUMENTS

1. All Documents indicating or, in lieu thereof, a sworn statement that shows:

a. Each current owner of the Company, both direct and indirect.

- b. The ownership interest of each current owner of the Company, both direct and indirect.
 - c. Each prior owner of the Company, both direct and indirect.
 - d. The ownership interest of each prior owner of the Company, both direct and indirect.
- 2. All Documents constituting, referring to, or relating to any interest that can or, during the period covered by this subpoena, could be converted into an ownership interest of the Company.
- 3. All Documents listing or indicating or, in lieu thereof, a sworn statement that shows:
 - a. Each officer of the Company during the period covered by this subpoena.
 - b. The dates each officer of the Company was appointed and, where applicable, left the Company.
 - c. Each director or manager of the Company during the covered period.
- 4. All Documents setting forth or containing or, in lieu thereof, a sworn statement or organization chart that reflects the Company's structure.
- 5. All Documents indicating or, in lieu thereof, a sworn statement that shows:
 - a. Each Affiliate of the Company.
 - b. How each Affiliate is related to the Company, including any distributions of ownership interests.
 - c. Any Affiliate that has been receiving distributions from the Universal Service Fund by time period, i.e. (year/month).
- 6. All Documents listing all employees or independent contractors of the Company with their responsibilities and or titles, as available, including telephone directories.

7. All Documents constituting, containing or describing or, in lieu thereof, a sworn statement that explains processes and systems of the Company to comply with all federal and state rules and policies. A sworn statement should contain sufficient detail to identify each entity or department that has responsibility for a specific area of compliance and the responsibility of each such entity or department.
8. All Documents constituting minutes of the Company or summaries of Company meetings or agendas.
9. All Documents constituting financial statements (both audited and unaudited) of the Company as well as all outside auditor reports and opinions.
10. All Documents constituting agreements between the Company and:
 - a. Any provider of wholesale telephone service.
 - b. Any management companies.
 - c. Any entity that generates or distributes billing statements on behalf of the Company.
 - d. Any Affiliate.
 - e. Any Primary Agent.
 - f. Any Sub-Contractor Agent.
 - g. Any distributor for the Company.
 - h. Any entity providing back office support, including software to the Company.
 - i. Any party that provides support for Lifeline regulatory compliance.
 - j. Any entity holding debt of the Company greater than \$100,000.

11. All Documents constituting agreements that the Company requires each Agent to sign prior to any interaction with Customers or Applicants. In lieu of all Documents, the Company may provide a sworn statement with a sample form of agreement for each version of such agreement which identifies the period and group of Agents for which that sample is representative.
12. All Documents, by state, and then by date, identifying or, in lieu thereof, a sworn statement that shows, (a) all jurisdictions in which the Company provided or provides telecommunications services, including (if not providing a sworn statement) a copy of the Company's certifications to provide service, (b) the type(s) of telecommunications service provided in each jurisdiction by the Company, and (c) all ETC authorizations issued to the Company.
13. All Documents constituting communications of any type (including but not limited to, electronic mail (including as a cc or bcc recipient), text messages, instant messaging and voice messages) which concern or are related in any way to the provision of telecommunications, the USF generally, or the Low-Income Program.
14. All Documents constituting, containing or referring to or, in lieu thereof, a sworn statement that shows the criteria or basis which the Company used to "activate" a customer.
15. All Documents constituting the following records concerning each study area in which the Company operates:
 - a. All Documents providing or containing all records maintained by the Company related to or concerning each Customer's personally identifiable information, such as a Customer's account and records related to the Agent associated with the Customer. This includes, but is not limited to:
 - i. The account number of the Customer used by the Company.
 - ii. Customer name.

1. Any prefix to the Customer's name.
 2. Customer's first name.
 3. Customer's middle name.
 4. Customer's last name.
 5. Any suffix to the Customer's name.
 6. Any nickname of the Customer.
 7. Any alternate name fields maintained by the Company.
- iii. All fields concerning Customer address, including but not limited to:
1. The Customer address information provided to NLAD.
 2. The Customer address of records for the Company.
 3. The Customer mailing address.
 4. The Customer shipping address information.
 5. The applicable dates of such information.
- iv. Customer social security number.
- v. Customer date of birth.
- vi. Customer phone number(s) assigned by the Company or provided to NLAD.
- vii. Type of service, *i.e.*, wireless or landline, received from the Company.
- viii. Customer alternate telephone number or contact number provided to the Company at the time of application.

- ix. Customer email address.
- x. Whether the Customer was flagged as eligible for the tribal benefit.
- xi. The order number, if applicable, assigned by the Company upon the initial enrollment of the Customer.
- xii. The Agents who enrolled the Customer for service including such Agent's name and agent code.
- xiii. Each Auditor who reviewed or audited the Application Materials of the Customer including such Auditor's name and code.
- xiv. The basis on which the Agent determined the eligibility of the customer (e.g., "blue SNAP card" or "letter from State Health and Human Services Agency").
- xv. The date on which the Agent enrolled the Customer.
- xvi. The date on which phone service to the Customer started.
- xvii. Any date(s) upon which phone service to the Customer was suspended, if applicable.
- xviii. If applicable, the date on which phone service commenced again after being suspended.
- xix. The phone number assigned to the customer after Lifeline service resumed, if different from the initial number.
- xx. The date on which phone service ended, if applicable.
- xxi. The wholesale carrier from which the customer's line was purchased.
- xxii. The telecommunications, data and text service plan(s) with which the Customer was provided.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- b. All Documents, organized by study/service area and then by month, constituting, providing or containing all records maintained by the Company related to or concerning the Customers that supported each FCC Form 497.

This includes, but is not limited to:

- i. The calendar month for which the FCC Form 497 was submitted.
- ii. The Study Area for which the FCC Form 497 was submitted.
- iii. The date upon which the FCC Form 497 was submitted.
- iv. The following information concerning each Customer underlying the FCC Form 497:
 - 1. The Customer account number of the Customer used by the Company.
 - 2. The Customer names.
 - 3. All fields concerning Customer address.
 - 4. Whether the Customer was eligible for the tribal benefit.
 - 5. Whether the service provided to the Customer was designated as voice, broadband, or bundled.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- c. All Documents, organized by study/service area and then by month, constituting, providing or containing all records maintained by the Company related to or concerning the Customers that supported each FCC Form 555.

This includes, but is not limited to:

- i. For each Customer recertified because they were contacted directly to recertify eligibility through attestation:
 - 1. The year being recertified.
 - 2. The Study Area for which the FCC Form 497 was submitted.
 - 3. The Customer account number of the Customer used by the Company.
 - 4. The Customer names.
 - 5. The Customer date of birth.
 - 6. All fields concerning Customer address.
 - 7. How the Customer was contacted.
 - 8. The number of times a Customer was contacted prior to recertification.
- ii. For each Customer recertified because they were reviewed by the state administrator, ETC access to an eligibility database or by USAC:
 - 1. The year being recertified.
 - 2. The Study Area for which the FCC Form 497 was submitted.
 - 3. The Customer account number of the Customer used by the Company.

4. The Customer names.
 5. The Customer date of birth.
 6. All fields concerning Customer address.
 7. The basis upon which the Customer was recertified (*e.g.* the name of the state administrator or the eligibility database that the Company accessed or whether USAC performed the eligibility review).
- d. All Documents providing or containing all records maintained by the Company related to or concerning each Customer's billing record, including all records related to each Customer's monthly billing statement. This includes, but is not limited to:
- i. The Customer account number assigned by the Company.
 - ii. The Customer names.
 - iii. All fields concerning Customer address, including where each bill is sent. If the bill is sent through an alternate means, that means should be identified.
 - iv. Customer social security number.
 - v. Customer date of birth.
 - vi. Customer phone number assigned by the Company.
 - vii. The amount billed to a Customer in each calendar month.
 - viii. The amount paid by a Customer in each calendar month.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn

statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official. **Please note that, if the Company does not assess or collect a monthly fee from its Customers, then the OIG will accept a certification attesting to that in lieu of a response concerning billing records.**

- e. All Documents providing or containing all of the following records related to each Customer:
 - i. All applications of each Customer whether signed by the Customer or recorded by the Company or its representative.
 - ii. All certifications of each Customer whether signed by the Customer or recorded by the Company or its representative.
 - iii. All proofs of identification of the Customer maintained by the Company.
 - iv. All proofs of eligibility of the Customer maintained by the Company.
 - v. Any photograph of the Customer.
 - vi. All call, text and data records of the Customer (incoming and outgoing), as well as any other information used by the Company to satisfy the activation requirement and the usage requirements.
 - vii. All notifications by the Company to the Customer that a failure to use Lifeline service within the notice period will result in service termination for non-usage.
 - viii. All notifications by the Customer to the Company to terminate service.
 - ix. All Documents (including recordings) wherein the Customer, where applicable, agreed or authorized the Company to have such Customer's prior phone number ported to the Company.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- f. All Documents providing or containing all records maintained by the Company related to or concerning each Applicant's personally identifiable information, such Applicant's account and records related to the Agent associated with the Applicant. This includes, but is not limited to:
 - i. The date and time on which the Agent enrolled the Applicant.
 - ii. The marketing channel by which the Applicant filed an application, i.e., online, by phone, in-person direct selling (such as street teams), in-person indirect channels (such as retailers, e.g. convenience stores).
 - iii. Account number of the Applicant assigned by the Company.
 - iv. The order number, if applicable, assigned by the Company upon the initial enrollment of the Applicant.
 - v. The date(s) and time(s) in which the Company relayed information related to the Applicant to NLAD.
 - vi. All information relayed by the Company to NLAD related to the Applicant, including any overrides.
 - vii. The date(s) and time(s) in which the Company received information related to the Applicant from NLAD.
 - viii. All information received by the Company from NLAD in response to the data submitted related to the Applicant, including any overrides.
 - ix. The Agent who enrolled the Applicant including such Agent's name and agent code.

- x. The Auditor who reviewed or audited the Application Materials of the Applicant including such Auditor's name and code.
- xi. The basis on which the Agent determined the eligibility of the Applicant (e.g., "blue SNAP card" or "letter from State Health and Human Services Agency").

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- g. All Documents providing or containing all records maintained by the Company related to or concerning each telephone used by the Company on any mobile network. For each telephone, this includes but is not limited to:
 - i. The unique serial or identification number of the telephone.
 - ii. The manufacturer of the telephone.
 - iii. The model of the telephone.
 - iv. The date such telephone was provided to the Customer.
 - v. The date such telephone was activated on the network(s) used by the Company.
 - vi. The date such telephone was de-activated on the network(s) used by the Company.
 - vii. The telephone number associated with the telephone.
 - viii. The account number of the Customer associated with the telephone.
 - ix. The name of the Customer associated with the telephone.

- x. The date of birth of the Customer associated with the telephone.
- h. All Documents providing or containing all records maintained by the Company related to or concerning each Agent. This includes, but is not limited to:
 - i. The identification number or code of the Agent used by the Company.
 - ii. Agent name.
 - 1. Any prefix to the Agent's name.
 - 2. Agent's first name.
 - 3. Agent's middle name.
 - 4. Agent's last name.
 - 5. Any suffix to the Agent's name.
 - 6. Any nickname of the Agent.
 - 7. Any alternate name fields maintained by the Company.
 - iii. All fields concerning Agent address, including but not limited to:
 - 1. The Agent's address of record.
 - 2. The Agent's mailing address.
 - 3. The applicable dates of such information.
 - iv. Agent social security number.
 - v. Agent date of birth.
 - vi. Agent phone number.

- vii. Agent alternate phone number.
- viii. Agent email address.
- ix. Any other means of contacting the Agent available to the Company.
- x. Any photograph of the Agent.
- xi. The date on which the identification number or code of the Agent was assigned.
- xii. The date on which the identification number or code of the Agent was deactivated or suspended and the reason why, if applicable.
- xiii. The date the Agent was terminated, if applicable.
- xiv. The Primary Agent, Sub-Contractor Agent, or the department of the Company with which the Agent is associated.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- i. All Documents providing or containing all records maintained by the Company related to payments made, directly or indirectly, by the Company to an Agent. This includes, but is not limited to:
 - i. The identification number or code of the Agent used by the Company.
 - ii. The Agent names.
 - iii. Agent social security number.
 - iv. The amount of payment made to an Agent, directly or indirectly, in any calendar month by Customer.

- v. Bank account information, including account numbers, related to the payments the Company made to Agents. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or other lists of bank accounts may be provided in such format as approved by the OIG technical official the Company
- vi. The dates that the Agent enrolled each Customer for which payments were made.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- j. All Documents providing or containing all records maintained by the Company related to or concerning each Auditor. This includes, but is not limited to:
 - i. The identification number or code of the Auditor used by the Company.
 - ii. Auditor name.
 - 1. Any prefix to the Auditor's name.
 - 2. Auditor's first name.
 - 3. Auditor's middle name
 - 4. Auditor's last name.
 - 5. Any suffix to the Auditor's name.
 - 6. Any nickname of the Auditor.
 - 7. Any alternate name fields maintained by the Company.

- iii. All fields concerning Auditor address, including but not limited to:
 - 1. The Auditor's address of record.
 - 2. The Auditor's mailing address.
 - 3. The applicable dates of such information.
- iv. Auditor social security number.
- v. Auditor date of birth.
- vi. Auditor phone number.
- vii. Auditor alternate phone number.
- viii. Auditor email address.
- ix. Any other means of contacting the Auditor available to the Company.
- x. Any photograph of the Auditor.
- xi. The date the Auditor was terminated, if applicable.
- xii. The company with which the Auditor is associated.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- k. All Documents providing or containing all records maintained by the Company related to the reviews or audits performed by each Auditor. This includes, but is not limited to:
 - i. The identification number or code of the Auditor used by the Company.

- ii. The Auditor's name.
- iii. The date and time the Auditor reviewed or audited the Application Materials of the Applicant.
- iv. The account number of the Applicant used by the Company.
- v. The order number, if applicable, assigned by the Company upon the initial enrollment of the Applicant.
- vi. The name of the Applicant.
- vii. The outcome of the Auditor's review or audit of the Application Material of the Applicant.
- viii. The reason(s) provided by the Auditor for the outcome of the review or audit of the Application Material of the Applicant.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- 16. All database schemas (including lists of data tables and fields) and data dictionaries for the databases used to maintain the records responsive to Request 14.
- 17. All Documents constituting, containing or identifying all reports, queries or analysis the Company or its agents perform in the normal course of business (i.e., daily, monthly or at some other interval) of the records of any of its Applicants, Customers, Agents or Auditors. In lieu thereof, the Company may provide a sworn statement with an accompanying spreadsheet that (i) identifies each such report, query or analysis, (ii) describes the data included in each such report, query or analysis, (iii) identifies the databases utilized to generate each such report, query or analysis, (iv) states how

often each such report, query or analysis is performed and (v) lists the date of initial implementation of each such report, query or analysis.

18. All Documents constituting, containing or indicating or, in lieu thereof, a sworn statement that identifies the markets assigned to each Primary Agent. A market can include, but it not limited to, any geographic area and/or a particular sector of the population.
19. All Documents constituting, containing or indicating or, in lieu thereof, a sworn statement that identifies the role of call centers in the preparation and/or submission of Application Materials as well as the enrollment of Customers.
20. All Documents constituting, containing or indicating or, in lieu thereof, a sworn statement that identifies the Sub-Contractor Agents that provide services to each Primary Agent as well as all contact information for each such Sub-Contractor Agent.
21. All Documents constituting any investigations, reports, audit or analysis conducted by the Company of any call center, Primary Agent or Sub-Contractor Agent related to or concerning, directly or indirectly, services or goods offered by the Company involving the Low-Income Program.
22. All Documents containing, referencing or indicating any phone numbers, SMS short codes, or email addresses or other means used by or on behalf of the Company to contact a Customer concerning usage requirements. In lieu of all Documents, a sworn statement accompanying an electronic spreadsheet or database may be provided in such format as approved by the OIG technical official. Each phone number provided must be in a ten-digit format unless the call originated from a phone number that does not follow the North American Numbering Plan, in which case the OIG technical official should be consulted about the appropriate format to use.
23. All Documents constituting, referring to, or relating to policies, procedures, marketing or business plans or practices related to the Low-Income Program:

24. All Documents constituting, referring to, or relating to correspondence or other communications with a member of the public concerning the unsolicited receipt of a telephone from the Company, its agent or independent contractor.
25. Records of cellular telephones returned to the Company by any mail delivery service in the United States (including, without limitation, USPS, UPS, FedEx, and DHL).
26. All Documents constituting, referring to, or relating to correspondence or other communications with any mail delivery service (including, without limitation, USPS, UPS, FedEx, and DHL) concerning undelivered packages or other mail or cellular telephones returned to the Company.



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

November 2, 2017

TO: (b) (7)(C), (b) (6)
Tempo Telecom LLC
320 Interstate North Parkway, SE
Atlanta, GA 30339

YOU ARE HEREBY COMMANDED, PURSUANT TO THE AUTHORITY OF THE INSPECTOR GENERAL ACT OF 1978, AS AMENDED (5 U.S.C. App. 3), TO PRODUCE DOCUMENTS identified in the attached **Subpoena Duces Tecum Attachment A** at such time and place as defined and instructed below.

DATE: December 4, 2017 at 5:00 p.m.

PLACE: Jay C. Keithley, Esq.
Assistant Inspector General for Investigations
Office of the Inspector General
Federal Communications Commission
9300 East Hampton Drive
Capital Heights, MD 20743

In addition, production in response to this subpoena must follow the Federal Communications Commission Office of Inspector General Guidelines for Production, which is attached to this subpoena as **Subpoena Duces Tecum Attachment B**.

Among its duties, the FCC OIG conducts investigations relating to the programs of the Federal Communications Commission. As set forth in the subpoena, our office is authorized to issue subpoenas to gather all information, documents, reports, answers, records, accounts, papers, and other data in any medium (including electronically stored information, as well as any tangible thing) and documentary evidence which are necessary in the performance of our duties.

If you fail to comply with the subpoena, we are authorized to seek enforcement in the appropriate United States district court. 5a U.S.C. §6(a)(4). If such an order is obtained and you



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

November 28, 2017

TO: (b) (7)(C), (b) (6)
Cellspan, Inc.
7920 Belt Line Rd.
Suite 737
Dallas, TX 75254

YOU ARE HEREBY COMMANDED, PURSUANT TO THE AUTHORITY OF THE INSPECTOR GENERAL ACT OF 1978, AS AMENDED (5 U.S.C. App. 3), TO PRODUCE DOCUMENTS identified in the attached **Subpoena Duces Tecum Attachment A** at such time and place as defined and instructed below.

DATE: December 29, 2017 at 5:00 p.m.

PLACE: Jay C. Keithley, Esq.
Assistant Inspector General for Investigations
Office of the Inspector General
Federal Communications Commission
9050 Junction Drive
Annapolis Junction
Annapolis, MD 20701

In addition, production in response to this subpoena must follow the Federal Communications Commission Office of Inspector General Guidelines for Production, which is attached to this subpoena as **Subpoena Duces Tecum Attachment B**.

Among its duties, the FCC OIG conducts investigations relating to the programs of the Federal Communications Commission. As set forth in the subpoena, our office is authorized to issue subpoenas to gather all information, documents, reports, answers, records, accounts, papers, and other data in any medium (including electronically stored information, as well as any tangible thing) and documentary evidence which are necessary in the performance of our duties.

into easily understandable form; laptop computers issued to officers and employees; and, any preliminary versions, drafts or revisions of any of the foregoing.

J. “**Lifeline**” or the “**Low Income Program**” means the component of the Universal Service Fund set forth in 47 C.F.R. Part 54, Subpart E.

K. “**NLAD**” means the National Lifeline Accountability Database, established by USAC pursuant to 47 CFR §54.404.

L. “**Primary Agent**” means any entity that has the authority through a contract or a similar arrangement with the Company to provide the Company with Agents. For example, a Primary Agent may be an entity that gives its employees the authority to act as Agents, contracts with individuals to act as Agents or sub-contracts out work to an independent Sub-Contractor Agent.

M. “**Sub-Contractor Agent**” means any entity that, through a contract or a similar arrangement with a Primary Agent or another Sub-Contractor Agent, has the authority to hire or contract with individuals to act as Agents. Such entity may also have the authority to sub-contract out work to another Sub-Contractor Agent.

N. “**USAC**” means the Universal Service Administrative Company.

O. “**Subpoena**” means the subpoena to which this appendix is attached as well as all its appendixes and other attachments.

P. “**USF**” is the Universal Service Fund, a federal program implemented pursuant to 47 U.S.C. §254.

SECTION III – REQUESTED DOCUMENTS

1. All Documents indicating or, in lieu thereof, a sworn statement that shows:

a. Each current owner of the Company, both direct and indirect.

- b. The ownership interest of each current owner of the Company, both direct and indirect.
 - c. Each prior owner of the Company, both direct and indirect.
 - d. The ownership interest of each prior owner of the Company, both direct and indirect.
- 2. All Documents listing or indicating or, in lieu thereof, a sworn statement that shows:
 - a. Each officer of the Company during the period covered by this subpoena.
 - b. The dates each officer of the Company was appointed and, where applicable, left the Company.
 - c. Each director or manager of the Company during the covered period.
- 3. All Documents setting forth or containing or, in lieu thereof, a sworn statement or organization chart that reflects the Company's structure.
- 4. All Documents listing all employees or independent contractors of the Company with their responsibilities and or titles, as available, including telephone directories.
- 5. All Documents constituting, containing or describing or, in lieu thereof, a sworn statement that explains processes and systems of the Company to comply with all federal and state rules and policies. A sworn statement should contain sufficient detail to identify each entity or department that has responsibility for a specific area of compliance and the responsibility of each such entity or department.
- 6. All Documents constituting agreements between the Company and:
 - a. Any Affiliate.
 - b. Any Primary Agent.
 - c. Any Sub-Contractor Agent.

- d. Any entity providing back office support, including software to the Company.
 - e. Any party that provides support for Lifeline regulatory compliance.
- 7. All Documents, by state, and then by date, identifying or, in lieu thereof, a sworn statement that shows, (a) all jurisdictions in which the Company provided or provides telecommunications services, including (if not providing a sworn statement) a copy of the Company's certifications to provide service, (b) the type(s) of telecommunications service provided in each jurisdiction by the Company, and (c) all ETC authorizations issued to the Company.
 - 8. All Documents constituting communications of any type (including but not limited to, electronic mail (including as a cc or bcc recipient), text messages, instant messaging and voice messages) which concern or are related in any way to the provision of telecommunications, the USF generally, or the Low-Income Program.
 - 9. All Documents constituting the following records concerning each study area in which the Company operates:
 - a. All Documents providing or containing all records maintained by the Company related to or concerning each Customer's personally identifiable information, such as a Customer's account and records related to the Agent associated with the Customer. This includes, but is not limited to:
 - i. The account number of the Customer used by the Company.
 - ii. Customer name.
 - 1. Any prefix to the Customer's name.
 - 2. Customer's first name.
 - 3. Customer's middle name.
 - 4. Customer's last name.

5. Any suffix to the Customer's name.
 6. Any nickname of the Customer.
 7. Any alternate name fields maintained by the Company.
- iii. All fields concerning Customer address, including but not limited to:
1. The Customer address information provided to NLAD.
 2. The Customer address of records for the Company.
 3. The Customer mailing address.
 4. The Customer shipping address information.
 5. The applicable dates of such information.
- iv. Customer social security number.
- v. Customer date of birth.
- vi. Customer phone number(s) assigned by the Company or provided to NLAD.
- vii. Type of service, *i.e.*, wireless or landline, received from the Company.
- viii. Customer alternate telephone number or contact number provided to the Company at the time of application.
- ix. Customer email address.
- x. Whether the Customer was flagged as eligible for the tribal benefit.
- xi. The order number, if applicable, assigned by the Company upon the initial enrollment of the Customer.

- xii. The Agents who enrolled the Customer for service including such Agent's name and agent code.
- xiii. Each Auditor who reviewed or audited the Application Materials of the Customer including such Auditor's name and code.
- xiv. The basis on which the Agent determined the eligibility of the customer (e.g., "blue SNAP card" or "letter from State Health and Human Services Agency").
- xv. The date on which the Agent enrolled the Customer.
- xvi. The date on which phone service to the Customer started.
- xvii. Any date(s) upon which phone service to the Customer was suspended, if applicable.
- xviii. If applicable, the date on which phone service commenced again after being suspended.
- xix. The phone number assigned to the customer after Lifeline service resumed, if different from the initial number.
- xx. The date on which phone service ended, if applicable.
- xxi. The wholesale carrier from which the customer's line was purchased.
- xxii. The telecommunications, data and text service plan(s) with which the Customer was provided.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- b. All Documents, organized by study/service area and then by month, constituting, providing or containing all records maintained by the Company related to or concerning the Customers that supported each FCC Form 497. This includes, but is not limited to:

- i. The calendar month for which the FCC Form 497 was submitted.
- ii. The Study Area for which the FCC Form 497 was submitted.
- iii. The date upon which the FCC Form 497 was submitted.
- iv. The following information concerning each Customer underlying the FCC Form 497:
 1. The Customer account number of the Customer used by the Company.
 2. The Customer names.
 3. All fields concerning Customer address.
 4. Whether the Customer was eligible for the tribal benefit.
 5. Whether the service provided to the Customer was designated as voice, broadband, or bundled.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- c. All Documents, organized by study/service area and then by month, constituting, providing or containing all records maintained by the Company related to or concerning the Customers that supported each FCC Form 555. This includes, but is not limited to:

- i. For each Customer recertified because they were contacted directly to recertify eligibility through attestation:
 - 1. The year being recertified.
 - 2. The Study Area for which the FCC Form 497 was submitted.
 - 3. The Customer account number of the Customer used by the Company.
 - 4. The Customer names.
 - 5. The Customer date of birth.
 - 6. All fields concerning Customer address.
 - 7. How the Customer was contacted.
 - 8. The number of times a Customer was contacted prior to recertification.
- ii. For each Customer recertified because they were reviewed by the state administrator, ETC access to an eligibility database or by USAC:
 - 1. The year being recertified.
 - 2. The Study Area for which the FCC Form 497 was submitted.
 - 3. The Customer account number of the Customer used by the Company.
 - 4. The Customer names.
 - 5. The Customer date of birth.
 - 6. All fields concerning Customer address.

7. The basis upon which the Customer was recertified (*e.g.* the name of the state administrator or the eligibility database that the Company accessed or whether USAC performed the eligibility review).
- d. All Documents providing or containing all records maintained by the Company related to or concerning each Customer's billing record, including all records related to each Customer's monthly billing statement. This includes, but is not limited to:
 - i. The Customer account number assigned by the Company.
 - ii. The Customer names.
 - iii. All fields concerning Customer address, including where each bill is sent. If the bill is sent through an alternate means, that means should be identified.
 - iv. Customer social security number.
 - v. Customer date of birth.
 - vi. Customer phone number assigned by the Company.
 - vii. The amount billed to a Customer in each calendar month.
 - viii. The amount paid by a Customer in each calendar month.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official. **Please note that, if the Company does not assess or collect a monthly fee from its Customers, then the OIG will accept a certification attesting to that in lieu of a response concerning billing records.**

- e. All Documents providing or containing all of the following records related to each Customer:
 - i. All applications of each Customer whether signed by the Customer or recorded by the Company or its representative.
 - ii. All certifications of each Customer whether signed by the Customer or recorded by the Company or its representative.
 - iii. All proofs of identification of the Customer maintained by the Company.
 - iv. All proofs of eligibility of the Customer maintained by the Company.
 - v. Any photograph of the Customer.
 - vi. All call, text and data records of the Customer (incoming and outgoing), as well as any other information used by the Company to satisfy the activation requirement and the usage requirements.
 - vii. All notifications by the Company to the Customer that a failure to use Lifeline service within the notice period will result in service termination for non-usage.
 - viii. All notifications by the Customer to the Company to terminate service.
 - ix. All Documents (including recordings) wherein the Customer, where applicable, agreed or authorized the Company to have such Customer's prior phone number ported to the Company.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- f. All Documents providing or containing all records maintained by the Company related to or concerning each Applicant's personally identifiable information, such Applicant's account and records related to the Agent associated with the Applicant. This includes, but is not limited to:
- i. The date and time on which the Agent enrolled the Applicant.
 - ii. The marketing channel by which the Applicant filed an application, i.e., online, by phone, in-person direct selling (such as street teams), in-person indirect channels (such as retailers, e.g. convenience stores).
 - iii. Account number of the Applicant assigned by the Company.
 - iv. The order number, if applicable, assigned by the Company upon the initial enrollment of the Applicant.
 - v. The date(s) and time(s) in which the Company relayed information related to the Applicant to NLAD.
 - vi. All information relayed by the Company to NLAD related to the Applicant, including any overrides.
 - vii. The date(s) and time(s) in which the Company received information related to the Applicant from NLAD.
 - viii. All information received by the Company from NLAD in response to the data submitted related to the Applicant, including any overrides.
 - ix. The Agent who enrolled the Applicant including such Agent's name and agent code.
 - x. The Auditor who reviewed or audited the Application Materials of the Applicant including such Auditor's name and code.

- xi. The basis on which the Agent determined the eligibility of the Applicant (e.g., "blue SNAP card" or "letter from State Health and Human Services Agency").

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- g. All Documents providing or containing all records maintained by the Company related to or concerning each Agent. This includes, but is not limited to:
 - i. The identification number or code of the Agent used by the Company.
 - ii. Agent name.
 - 1. Any prefix to the Agent's name.
 - 2. Agent's first name.
 - 3. Agent's middle name.
 - 4. Agent's last name.
 - 5. Any suffix to the Agent's name.
 - 6. Any nickname of the Agent.
 - 7. Any alternate name fields maintained by the Company.
 - iii. All fields concerning Agent address, including but not limited to:
 - 1. The Agent's address of record.
 - 2. The Agent's mailing address.

3. The applicable dates of such information.

- iv. Agent social security number.
- v. Agent date of birth.
- vi. Agent phone number.
- vii. Agent alternate phone number.
- viii. Agent email address.
- ix. Any other means of contacting the Agent available to the Company.
- x. Any photograph of the Agent.
- xi. The date on which the identification number or code of the Agent was assigned.
- xii. The date on which the identification number or code of the Agent was deactivated or suspended and the reason why, if applicable.
- xiii. The date the Agent was terminated, if applicable.
- xiv. The Primary Agent, Sub-Contractor Agent, or the department of the Company with which the Agent is associated.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- h. All Documents providing or containing all records maintained by the Company related to payments made, directly or indirectly, by the Company to an Agent. This includes, but is not limited to:

- i. The identification number or code of the Agent used by the Company.
- ii. The Agent names.
- iii. Agent social security number.
- iv. The amount of payment made to an Agent, directly or indirectly, in any calendar month by Customer.
- v. Bank account information, including account numbers, related to the payments the Company made to Agents. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or other lists of bank accounts may be provided in such format as approved by the OIG technical official the Company
- vi. The dates that the Agent enrolled each Customer for which payments were made.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- i. All Documents providing or containing all records maintained by the Company related to or concerning each Auditor. This includes, but is not limited to:
 - i. The identification number or code of the Auditor used by the Company.
 - ii. Auditor name.
 - 1. Any prefix to the Auditor's name.
 - 2. Auditor's first name.

3. Auditor's middle name
 4. Auditor's last name.
 5. Any suffix to the Auditor's name.
 6. Any nickname of the Auditor.
 7. Any alternate name fields maintained by the Company.
- iii. All fields concerning Auditor address, including but not limited to:
 1. The Auditor's address of record.
 2. The Auditor's mailing address.
 3. The applicable dates of such information.
 - iv. Auditor social security number.
 - v. Auditor date of birth.
 - vi. Auditor phone number.
 - vii. Auditor alternate phone number.
 - viii. Auditor email address.
 - ix. Any other means of contacting the Auditor available to the Company.
 - x. Any photograph of the Auditor.
 - xi. The date the Auditor was terminated, if applicable.
 - xii. The company with which the Auditor is associated.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn

statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- j. All Documents providing or containing all records maintained by the Company related to the reviews or audits performed by each Auditor. This includes, but is not limited to:
 - i. The identification number or code of the Auditor used by the Company.
 - ii. The Auditor's name.
 - iii. The date and time the Auditor reviewed or audited the Application Materials of the Applicant.
 - iv. The account number of the Applicant used by the Company.
 - v. The order number, if applicable, assigned by the Company upon the initial enrollment of the Applicant.
 - vi. The name of the Applicant.
 - vii. The outcome of the Auditor's review or audit of the Application Material of the Applicant.
 - viii. The reason(s) provided by the Auditor for the outcome of the review or audit of the Application Material of the Applicant.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- 10. All database schemas (including lists of data tables and fields) and data dictionaries for the databases used to maintain the records responsive to Request 9.

11. All Documents constituting, containing or identifying all reports, queries or analysis the Company or its agents perform in the normal course of business (i.e., daily, monthly or at some other interval) of the records of any of its Applicants, Customers, Agents or Auditors. In lieu thereof, the Company may provide a sworn statement with an accompanying spreadsheet that (i) identifies each such report, query or analysis, (ii) describes the data included in each such report, query or analysis, (iii) identifies the databases utilized to generate each such report, query or analysis, (iv) states how often each such report, query or analysis is performed and (v) lists the date of initial implementation of each such report, query or analysis.
12. All Documents constituting, containing or indicating or, in lieu thereof, a sworn statement that identifies the Sub-Contractor Agents that provide services to each Primary Agent as well as all contact information for each such Sub-Contractor Agent.
13. All Documents constituting any investigations, reports, audit or analysis conducted by the Company of any call center, Primary Agent or Sub-Contractor Agent related to or concerning, directly or indirectly, services or goods offered by the Company involving the Low-Income Program.
14. All Documents constituting, referring to, or relating to policies, procedures, marketing or business plans or practices related to the Low-Income Program:
15. All Documents constituting, referring to, or relating to correspondence or other communications with a member of the public concerning the unsolicited receipt of a telephone from the Company, its agent or independent contractor.
16. Records of cellular telephones returned to the Company by any mail delivery service in the United States (including, without limitation, USPS, UPS, FedEx, and DHL).



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

November 29, 2017

TO: Saul Ramirez
President
TerraCom, Inc.
PO Box 13006
Oklahoma City, OK 73113

YOU ARE HEREBY COMMANDED, PURSUANT TO THE AUTHORITY OF THE INSPECTOR GENERAL ACT OF 1978, AS AMENDED (5 U.S.C. App. 3), TO PRODUCE DOCUMENTS identified in the attached Subpoena Duces Tecum Attachment A at such time and place as defined and instructed below.

DATE: January 5, 2017 at 5:00 p.m.

PLACE: Jay C. Keithley, Esq.
Assistant Inspector General for Investigations
Office of the Inspector General
Federal Communications Commission
9050 Junction Drive
Annapolis Junction
Annapolis, MD 20701

In addition, production in response to this subpoena must follow the Federal Communications Commission Office of Inspector General Guidelines for Production, which is attached to this subpoena as **Subpoena Duces Tecum Attachment B**.

Among its duties, the FCC OIG conducts investigations relating to the programs of the Federal Communications Commission. As set forth in the subpoena, our office is authorized to issue subpoenas to gather all information, documents, reports, answers, records, accounts, papers, and other data in any medium (including electronically stored information, as well as any tangible thing) and documentary evidence which are necessary in the performance of our duties.

If you fail to comply with the subpoena, we are authorized to seek enforcement in the appropriate United States district court. 5a U.S.C. §6(a)(4). If such an order is obtained and you

into easily understandable form; laptop computers issued to officers and employees; and, any preliminary versions, drafts or revisions of any of the foregoing.

J. “**Lifeline**” or the “**Low Income Program**” means the component of the Universal Service Fund set forth in 47 C.F.R. Part 54, Subpart E.

K. “**NLAD**” means the National Lifeline Accountability Database, established by USAC pursuant to 47 CFR §54.404.

L. “**Primary Agent**” means any entity that has the authority through a contract or a similar arrangement with the Company to provide the Company with Agents. For example, a Primary Agent may be an entity that gives its employees the authority to act as Agents, contracts with individuals to act as Agents or sub-contracts out work to an independent Sub-Contractor Agent.

M. “**Sub-Contractor Agent**” means any entity that, through a contract or a similar arrangement with a Primary Agent or another Sub-Contractor Agent, has the authority to hire or contract with individuals to act as Agents. Such entity may also have the authority to sub-contract out work to another Sub-Contractor Agent.

N. “**USAC**” means the Universal Service Administrative Company.

O. “**Subpoena**” means the subpoena to which this appendix is attached as well as all its appendixes and other attachments.

P. “**USF**” is the Universal Service Fund, a federal program implemented pursuant to 47 U.S.C. §254.

SECTION III – REQUESTED DOCUMENTS

1. All Documents indicating or, in lieu thereof, a sworn statement that shows each current owner of the Company, both direct and indirect, and the ownership interest of each current owner of the Company.
2. All Documents listing or indicating or, in lieu thereof, a sworn statement that shows:

- a. Each officer of the Company during the period covered by this subpoena.
 - b. The dates each officer of the Company was appointed and, when applicable, left the Company.
3. All Documents setting forth or containing or, in lieu thereof, a sworn statement or organization chart that reflects the Company's structure.
4. All Documents listing all employees or independent contractors of the Company with their responsibilities and or titles, as available, including telephone directories.
5. All Documents constituting, containing or describing or, in lieu thereof, a sworn statement that explains processes and systems of the Company to comply with all federal and state rules and policies. A sworn statement should contain sufficient detail to identify each entity or department that has responsibility for a specific area of compliance and the responsibility of each such entity or department.
6. All Documents constituting agreements between the Company and:
 - a. Any Affiliate.
 - b. Any Primary Agent.
 - c. Any Sub-Contractor Agent.
 - d. Any entity providing back office support, including software to the Company.
 - e. Any party that provides support for Lifeline regulatory compliance.
7. All Documents, by state, and then by date, identifying or, in lieu thereof, a sworn statement that shows, (a) all jurisdictions in which the Company provided or provides telecommunications services, including (if not providing a sworn statement) a copy of the Company's certifications to provide service, (b) the type(s) of telecommunications service provided in each jurisdiction by the Company, and (c) all ETC authorizations issued to the Company.

8. All Documents constituting communications of any type (including but not limited to, electronic mail (including as a cc or bcc recipient), text messages, instant messaging and voice messages) which concern or are related in any way to the provision of telecommunications, the USF generally, or the Low-Income Program.
9. All Documents constituting the following records concerning each study area in which the Company operates:
 - a. All Documents providing or containing all records maintained by the Company related to or concerning each Customer's personally identifiable information, such as a Customer's account and records related to the Agent associated with the Customer. This includes, but is not limited to:
 - i. The account number of the Customer used by the Company.
 - ii. Customer name.
 - iii. All fields concerning any Customer address.
 - iv. Customer social security number.
 - v. Customer date of birth.
 - vi. All fields concerning Customer phone number(s).
 - vii. Whether the Customer was flagged as eligible for the tribal benefit.
 - viii. The order number, if applicable, assigned by the Company upon the initial enrollment of the Customer.
 - ix. The Agent who enrolled the Customer for service including such Agent's name and agent code.
 - x. Each Auditor who reviewed or audited the Application Materials of the Customer including such Auditor's name and code.

- xii. The basis on which the Agent determined the eligibility of the customer (e.g., "blue SNAP card" or "letter from State Health and Human Services Agency").
- xiii. The date and time when the Agent enrolled the Customer.
- xiv. The date on which phone service to the Customer started.
- xv. Any date(s) upon which phone service to the Customer was suspended, if applicable.
- xvi. If applicable, the date on which phone service commenced again after being suspended.
- xvii. The phone number assigned to the customer after Lifeline service resumed, if different from the initial number.
- xviii. The date on which phone service ended, if applicable.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- b. All Documents, organized by study/service area and then by month, constituting, providing or containing all records maintained by the Company related to or concerning the Customers that supported each FCC Form 497.
- c. All Documents, organized by study/service area and then by month, constituting, providing or containing all records maintained by the Company related to or concerning the Customers that supported each FCC Form 555.
- d. All Documents providing or containing all records maintained by the Company related to or concerning each Customer's billing record, including all records related to each Customer's monthly billing statement. All data

above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official. **Please note that, if the Company does not assess or collect a monthly fee from its Customers, then the OIG will accept a certification attesting to that in lieu of a response concerning billing records.**

- e. All Documents providing or containing all of the following records related to each Customer:
 - i. All applications of each Customer whether signed by the Customer or recorded by the Company or its representative.
 - ii. All certifications of each Customer whether signed by the Customer or recorded by the Company or its representative.
 - iii. All proofs of identification of the Customer maintained by the Company.
 - iv. All proofs of eligibility of the Customer maintained by the Company.
 - v. Any photograph of the Customer.
 - vi. All call, text and data records of the Customer (incoming and outgoing), as well as any other information used by the Company to satisfy the activation requirement and the usage requirements.
 - vii. All notifications by the Company to the Customer that a failure to use Lifeline service within the notice period will result in service termination for non-usage.
 - viii. All notifications by the Customer to the Company to terminate service.

- ix. All Documents (including recordings) wherein the Customer, where applicable, agreed or authorized the Company to have such Customer's prior phone number ported to the Company.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- f. All Documents providing or containing all records maintained by the Company related to or concerning each Applicant's personally identifiable information, such Applicant's account and records related to the Agent associated with the Applicant. This includes, but is not limited to:
 - i. The date and time on which the Agent enrolled the Applicant.
 - ii. The marketing channel by which the Applicant filed an application, i.e., online, by phone, in-person direct selling (such as street teams), in-person indirect channels (such as retailers, e.g. convenience stores).
 - iii. Account number of the Applicant assigned by the Company.
 - iv. The order number, if applicable, assigned by the Company upon the initial enrollment of the Applicant.
 - v. The date(s) and time(s) in which the Company relayed information related to the Applicant to NLAD.
 - vi. All information relayed by the Company to NLAD related to the Applicant, including any overrides.
 - vii. The date(s) and time(s) in which the Company received information related to the Applicant from NLAD.

- viii. All information received by the Company from NLAD in response to the data submitted related to the Applicant, including any overrides.
- ix. The Agent who enrolled the Applicant including such Agent's name and agent code.
- x. The Auditor who reviewed or audited the Application Materials of the Applicant including such Auditor's name and code.
- xi. The basis on which the Agent determined the eligibility of the Applicant (e.g., "blue SNAP card" or "letter from State Health and Human Services Agency").

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- g. All Documents providing or containing all records maintained by the Company related to or concerning each Agent. This includes, but is not limited to:
 - i. The identification number or code of the Agent used by the Company.
 - ii. Agent name.
 - iii. All fields concerning Agent address
 - iv. Agent social security number.
 - v. Agent date of birth.
 - vi. Agent phone number.
 - vii. Any photograph of the Agent.

- viii. The date on which the identification number or code of the Agent was assigned.
- ix. The date on which the identification number or code of the Agent was deactivated or suspended and the reason why, if applicable.
- x. The date the Agent was terminated, if applicable.
- xi. The Primary Agent, Sub-Contractor Agent, or the department of the Company with which the Agent is associated.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- h. All Documents providing or containing all records maintained by the Company related to payments made, directly or indirectly, by the Company to an Agent. This includes, but is not limited to:
 - i. The amount of payment made to an Agent, directly or indirectly, in any calendar month by Customer.
 - ii. Bank account information, including account numbers, related to the payments the Company made to Agents. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or other lists of bank accounts may be provided in such format as approved by the OIG technical official the Company
 - iii. The dates that the Agent enrolled each Customer for which payments were made.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn

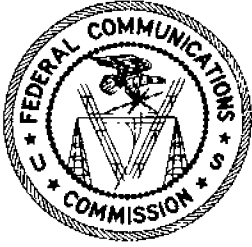
statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- i. All Documents providing or containing all records maintained by the Company related to the reviews or audits performed by each Auditor. This includes, but is not limited to:
 - i. The identification number or code of the Auditor used by the Company.
 - ii. The Auditor's name.
 - iii. The date and time the Auditor reviewed or audited the Application Materials of the Applicant.
 - iv. The account number of the Applicant used by the Company.
 - v. The order number, if applicable, assigned by the Company upon the initial enrollment of the Applicant.
 - vi. The name of the Applicant.
 - vii. The outcome of the Auditor's review or audit of the Application Material of the Applicant.
 - viii. The reason(s) provided by the Auditor for the outcome of the review or audit of the Application Material of the Applicant.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

10. All database schemas (including lists of data tables and fields) and data dictionaries for the databases used to maintain the records responsive to Request 9.

11. All Documents constituting, containing or identifying all reports, queries or analysis the Company or its agents perform in the normal course of business (i.e., daily, monthly or at some other interval) of the records of any of its Applicants, Customers, Agents or Auditors. In lieu thereof, the Company may provide a sworn statement with an accompanying spreadsheet that (i) identifies each such report, query or analysis, (ii) describes the data included in each such report, query or analysis, (iii) identifies the databases utilized to generate each such report, query or analysis, (iv) states how often each such report, query or analysis is performed and (v) lists the date of initial implementation of each such report, query or analysis.
12. All Documents constituting, containing or indicating or, in lieu thereof, a sworn statement that identifies the Sub-Contractor Agents that provide services to each Primary Agent as well as all contact information for each such Sub-Contractor Agent.
13. All Documents constituting any investigations, reports, audit or analysis conducted by the Company of any call center, Primary Agent or Sub-Contractor Agent related to or concerning, directly or indirectly, services or goods offered by the Company involving the Low-Income Program.
14. All Documents constituting, referring to, or relating to policies, procedures, marketing or business plans or practices related to the Low-Income Program:
15. All Documents constituting, referring to, or relating to correspondence or other communications with a member of the public concerning the unsolicited receipt of a telephone from the Company, its agent or independent contractor.
16. Records of cellular telephones returned to the Company by any mail delivery service in the United States (including, without limitation, USPS, UPS, FedEx, and DHL).



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

November 29, 2017

TO: Stephen D. Klein
President
Amerimex Communications Corporation
2323 Curlew Road Suite 7B
Dunedin, FL 34698

YOU ARE HEREBY COMMANDED, PURSUANT TO THE AUTHORITY OF THE INSPECTOR GENERAL ACT OF 1978, AS AMENDED (5 U.S.C. App. 3), TO PRODUCE DOCUMENTS identified in the attached Subpoena Duces Tecum Attachment A at such time and place as defined and instructed below.

DATE: January 5, 2017 at 5:00 p.m.

PLACE: Jay C. Keithley, Esq.
Assistant Inspector General for Investigations
Office of the Inspector General
Federal Communications Commission
9050 Junction Drive
Annapolis Junction
Annapolis, MD 20701

In addition, production in response to this subpoena must follow the Federal Communications Commission Office of Inspector General Guidelines for Production, which is attached to this subpoena as **Subpoena Duces Tecum Attachment B**.

Among its duties, the FCC OIG conducts investigations relating to the programs of the Federal Communications Commission. As set forth in the subpoena, our office is authorized to issue subpoenas to gather all information, documents, reports, answers, records, accounts, papers, and other data in any medium (including electronically stored information, as well as any tangible thing) and documentary evidence which are necessary in the performance of our duties.

into easily understandable form; laptop computers issued to officers and employees; and, any preliminary versions, drafts or revisions of any of the foregoing.

J. **“Lifeline”** or the **“Low Income Program”** means the component of the Universal Service Fund set forth in 47 C.F.R. Part 54, Subpart E.

K. **“NLAD”** means the National Lifeline Accountability Database, established by USAC pursuant to 47 CFR §54.404.

L. **“Primary Agent”** means any entity that has the authority through a contract or a similar arrangement with the Company to provide the Company with Agents. For example, a Primary Agent may be an entity that gives its employees the authority to act as Agents, contracts with individuals to act as Agents or sub-contracts out work to an independent Sub-Contractor Agent.

M. **“Sub-Contractor Agent”** means any entity that, through a contract or a similar arrangement with a Primary Agent or another Sub-Contractor Agent, has the authority to hire or contract with individuals to act as Agents. Such entity may also have the authority to sub-contract out work to another Sub-Contractor Agent.

N. **“USAC”** means the Universal Service Administrative Company.

O. **“Subpoena”** means the subpoena to which this appendix is attached as well as all its appendixes and other attachments.

P. **“USF”** is the Universal Service Fund, a federal program implemented pursuant to 47 U.S.C. §254.

SECTION III – REQUESTED DOCUMENTS

1. All Documents indicating or, in lieu thereof, a sworn statement that shows each current owner of the Company, both direct and indirect, and the ownership interest of each current owner of the Company.
2. All Documents listing or indicating or, in lieu thereof, a sworn statement that shows:

- a. Each officer of the Company during the period covered by this subpoena.
 - b. The dates each officer of the Company was appointed and, when applicable, left the Company.
3. All Documents setting forth or containing or, in lieu thereof, a sworn statement or organization chart that reflects the Company's structure.
4. All Documents listing all employees or independent contractors of the Company with their responsibilities and or titles, as available, including telephone directories.
5. All Documents constituting, containing or describing or, in lieu thereof, a sworn statement that explains processes and systems of the Company to comply with all federal and state rules and policies. A sworn statement should contain sufficient detail to identify each entity or department that has responsibility for a specific area of compliance and the responsibility of each such entity or department.
6. All Documents constituting agreements between the Company and:
 - a. Any Affiliate.
 - b. Any Primary Agent.
 - c. Any Sub-Contractor Agent.
 - d. Any entity providing back office support, including software to the Company.
 - e. Any party that provides support for Lifeline regulatory compliance.
7. All Documents, by state, and then by date, identifying or, in lieu thereof, a sworn statement that shows, (a) all jurisdictions in which the Company provided or provides telecommunications services, including (if not providing a sworn statement) a copy of the Company's certifications to provide service, (b) the type(s) of telecommunications service provided in each jurisdiction by the Company, and (c) all ETC authorizations issued to the Company.

8. All Documents constituting communications of any type (including but not limited to, electronic mail (including as a cc or bcc recipient), text messages, instant messaging and voice messages) which concern or are related in any way to the provision of telecommunications, the USF generally, or the Low-Income Program.
9. All Documents constituting the following records concerning each study area in which the Company operates:
 - a. All Documents providing or containing all records maintained by the Company related to or concerning each Customer's personally identifiable information, such as a Customer's account and records related to the Agent associated with the Customer. This includes, but is not limited to:
 - i. The account number of the Customer used by the Company.
 - ii. Customer name.
 - iii. All fields concerning any Customer address.
 - iv. Customer social security number.
 - v. Customer date of birth.
 - vi. All fields concerning Customer phone number(s).
 - vii. Whether the Customer was flagged as eligible for the tribal benefit.
 - viii. The order number, if applicable, assigned by the Company upon the initial enrollment of the Customer.
 - ix. The Agent who enrolled the Customer for service including such Agent's name and agent code.
 - x. Each Auditor who reviewed or audited the Application Materials of the Customer including such Auditor's name and code.

- xi. The basis on which the Agent determined the eligibility of the customer (e.g., "blue SNAP card" or "letter from State Health and Human Services Agency").
- xii. The date and time when the Agent enrolled the Customer.
- xiii. The date on which phone service to the Customer started.
- xiv. Any date(s) upon which phone service to the Customer was suspended, if applicable.
- xv. If applicable, the date on which phone service commenced again after being suspended.
- xvi. The phone number assigned to the customer after Lifeline service resumed, if different from the initial number.
- xvii. The date on which phone service ended, if applicable.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- b. All Documents, organized by study/service area and then by month, constituting, providing or containing all records maintained by the Company related to or concerning the Customers that supported each FCC Form 497.
- c. All Documents, organized by study/service area and then by month, constituting, providing or containing all records maintained by the Company related to or concerning the Customers that supported each FCC Form 555.
- d. All Documents providing or containing all records maintained by the Company related to or concerning each Customer's billing record, including all records related to each Customer's monthly billing statement. All data

above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official. **Please note that, if the Company does not assess or collect a monthly fee from its Customers, then the OIG will accept a certification attesting to that in lieu of a response concerning billing records.**

- e. All Documents providing or containing all of the following records related to each Customer:
 - i. All applications of each Customer whether signed by the Customer or recorded by the Company or its representative.
 - ii. All certifications of each Customer whether signed by the Customer or recorded by the Company or its representative.
 - iii. All proofs of identification of the Customer maintained by the Company.
 - iv. All proofs of eligibility of the Customer maintained by the Company.
 - v. Any photograph of the Customer.
 - vi. All call, text and data records of the Customer (incoming and outgoing), as well as any other information used by the Company to satisfy the activation requirement and the usage requirements.
 - vii. All notifications by the Company to the Customer that a failure to use Lifeline service within the notice period will result in service termination for non-usage.
 - viii. All notifications by the Customer to the Company to terminate service.

- ix. All Documents (including recordings) wherein the Customer, where applicable, agreed or authorized the Company to have such Customer's prior phone number ported to the Company.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- f. All Documents providing or containing all records maintained by the Company related to or concerning each Applicant's personally identifiable information, such Applicant's account and records related to the Agent associated with the Applicant. This includes, but is not limited to:
 - i. The date and time on which the Agent enrolled the Applicant.
 - ii. The marketing channel by which the Applicant filed an application, i.e., online, by phone, in-person direct selling (such as street teams), in-person indirect channels (such as retailers, e.g. convenience stores).
 - iii. Account number of the Applicant assigned by the Company.
 - iv. The order number, if applicable, assigned by the Company upon the initial enrollment of the Applicant.
 - v. The date(s) and time(s) in which the Company relayed information related to the Applicant to NLAD.
 - vi. All information relayed by the Company to NLAD related to the Applicant, including any overrides.
 - vii. The date(s) and time(s) in which the Company received information related to the Applicant from NLAD.

- viii. All information received by the Company from NLAD in response to the data submitted related to the Applicant, including any overrides.
- ix. The Agent who enrolled the Applicant including such Agent's name and agent code.
- x. The Auditor who reviewed or audited the Application Materials of the Applicant including such Auditor's name and code.
- xi. The basis on which the Agent determined the eligibility of the Applicant (e.g., "blue SNAP card" or "letter from State Health and Human Services Agency").

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- g. All Documents providing or containing all records maintained by the Company related to or concerning each Agent. This includes, but is not limited to:
 - i. The identification number or code of the Agent used by the Company.
 - ii. Agent name.
 - iii. All fields concerning Agent address
 - iv. Agent social security number.
 - v. Agent date of birth.
 - vi. Agent phone number.
 - vii. Any photograph of the Agent.

- viii. The date on which the identification number or code of the Agent was assigned.
- ix. The date on which the identification number or code of the Agent was deactivated or suspended and the reason why, if applicable.
- x. The date the Agent was terminated, if applicable.
- xi. The Primary Agent, Sub-Contractor Agent, or the department of the Company with which the Agent is associated.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- h. All Documents providing or containing all records maintained by the Company related to payments made, directly or indirectly, by the Company to an Agent. This includes, but is not limited to:
 - i. The amount of payment made to an Agent, directly or indirectly, in any calendar month by Customer.
 - ii. Bank account information, including account numbers, related to the payments the Company made to Agents. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or other lists of bank accounts may be provided in such format as approved by the OIG technical official the Company
 - iii. The dates that the Agent enrolled each Customer for which payments were made.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn

statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- i. All Documents providing or containing all records maintained by the Company related to the reviews or audits performed by each Auditor. This includes, but is not limited to:
 - i. The identification number or code of the Auditor used by the Company.
 - ii. The Auditor's name.
 - iii. The date and time the Auditor reviewed or audited the Application Materials of the Applicant.
 - iv. The account number of the Applicant used by the Company.
 - v. The order number, if applicable, assigned by the Company upon the initial enrollment of the Applicant.
 - vi. The name of the Applicant.
 - vii. The outcome of the Auditor's review or audit of the Application Material of the Applicant.
 - viii. The reason(s) provided by the Auditor for the outcome of the review or audit of the Application Material of the Applicant.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

10. All database schemas (including lists of data tables and fields) and data dictionaries for the databases used to maintain the records responsive to Request 9.

11. All Documents constituting, containing or identifying all reports, queries or analysis the Company or its agents perform in the normal course of business (i.e., daily, monthly or at some other interval) of the records of any of its Applicants, Customers, Agents or Auditors. In lieu thereof, the Company may provide a sworn statement with an accompanying spreadsheet that (i) identifies each such report, query or analysis, (ii) describes the data included in each such report, query or analysis, (iii) identifies the databases utilized to generate each such report, query or analysis, (iv) states how often each such report, query or analysis is performed and (v) lists the date of initial implementation of each such report, query or analysis.
12. All Documents constituting, containing or indicating or, in lieu thereof, a sworn statement that identifies the Sub-Contractor Agents that provide services to each Primary Agent as well as all contact information for each such Sub-Contractor Agent.
13. All Documents constituting any investigations, reports, audit or analysis conducted by the Company of any call center, Primary Agent or Sub-Contractor Agent related to or concerning, directly or indirectly, services or goods offered by the Company involving the Low-Income Program.
14. All Documents constituting, referring to, or relating to policies, procedures, marketing or business plans or practices related to the Low-Income Program:
15. All Documents constituting, referring to, or relating to correspondence or other communications with a member of the public concerning the unsolicited receipt of a telephone from the Company, its agent or independent contractor.
16. Records of cellular telephones returned to the Company by any mail delivery service in the United States (including, without limitation, USPS, UPS, FedEx, and DHL).



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

November 29, 2017

TO: John Willis
Chief Operating Officer
i-wireless LLC
1 Levee Way, Suite 3104
Newport, KY 41071

YOU ARE HEREBY COMMANDED, PURSUANT TO THE AUTHORITY OF THE INSPECTOR GENERAL ACT OF 1978, AS AMENDED (5 U.S.C. App. 3), TO PRODUCE DOCUMENTS identified in the attached **Subpoena Duces Tecum Appendix A** at such time and place as defined and instructed below.

DATE: December 29, 2017 at 5:00 p.m.

PLACE: Jay C. Keithley, Esq.
Assistant Inspector General for Investigations
Office of the Inspector General
Federal Communications Commission
9050 Junction Drive
Annapolis Junction
Annapolis, MD 20701

In addition, production in response to this subpoena must follow the Federal Communications Commission Office of Inspector General ("FCC OIG") Guidelines for Production, which is attached to this subpoena as **Subpoena Duces Tecum Appendix B**.

Among its duties, the FCC OIG conducts investigations relating to the programs of the Federal Communications Commission. As set forth in the subpoena, our office is authorized to issue subpoenas to gather all information, documents, reports, answers, records, accounts, papers, and other data in any medium (including electronically stored information, as well as any tangible thing) and documentary evidence which are necessary in the performance of our duties.

If you fail to comply with the subpoena, we are authorized to seek enforcement in the appropriate United States district court. 5a U.S.C. §6(a)(4). If such an order is obtained and you

into easily understandable form; laptop computers issued to officers and employees; and, any preliminary versions, drafts or revisions of any of the foregoing.

J. “**Lifeline**” or the “**Low Income Program**” means the component of the Universal Service Fund set forth in 47 C.F.R. Part 54, Subpart E.

K. “**NLAD**” means the National Lifeline Accountability Database, established by USAC pursuant to 47 CFR §54.404.

L. “**Primary Agent**” means any entity that has the authority through a contract or a similar arrangement with the Company to provide the Company with Agents. For example, a Primary Agent may be an entity that gives its employees the authority to act as Agents, contracts with individuals to act as Agents or sub-contracts out work to an independent Sub-Contractor Agent.

M. “**Sub-Contractor Agent**” means any entity that, through a contract or a similar arrangement with a Primary Agent or another Sub-Contractor Agent, has the authority to hire or contract with individuals to act as Agents. Such entity may also have the authority to sub-contract out work to another Sub-Contractor Agent.

N. “**USAC**” means the Universal Service Administrative Company.

O. “**Subpoena**” means the subpoena to which this appendix is attached as well as all its appendixes and other attachments.

P. “**USF**” is the Universal Service Fund, a federal program implemented pursuant to 47 U.S.C. §254.

SECTION III – REQUESTED DOCUMENTS

1. All Documents indicating or, in lieu thereof, a sworn statement that shows each current owner of the Company, both direct and indirect, and the ownership interest of each current owner of the Company.

2. All Documents listing or indicating or, in lieu thereof, a sworn statement that shows:
 - a. Each officer of the Company during the period covered by this subpoena.
 - b. The dates each officer of the Company was appointed and, where applicable, left the Company.
3. All Documents setting forth or containing or, in lieu thereof, a sworn statement or organization chart that reflects the Company's structure.
4. All Documents listing all employees or independent contractors of the Company with their responsibilities and or titles, as available, including telephone directories.
5. All Documents constituting, containing or describing or, in lieu thereof, a sworn statement that explains processes and systems of the Company to comply with all federal and state rules and policies. A sworn statement should contain sufficient detail to identify each entity or department that has responsibility for a specific area of compliance and the responsibility of each such entity or department.
6. All Documents constituting agreements between the Company and:
 - a. Any Affiliate.
 - b. Any Primary Agent.
 - c. Any Sub-Contractor Agent.
 - d. Any entity providing back office support, including software to the Company.
 - e. Any party that provides support for Lifeline regulatory compliance.
7. All Documents, by state, and then by date, identifying or, in lieu thereof, a sworn statement that shows, (a) all jurisdictions in which the Company provided or provides telecommunications services, including (if not providing a sworn statement) a copy of the Company's certifications to provide service, (b) the type(s) of

telecommunications service provided in each jurisdiction by the Company, and (c) all Eligible Telecommunications Carrier (“ETC”) authorizations issued to the Company.

8. All Documents constituting communications of any type (including but not limited to, electronic mail (including as a cc or bcc recipient), text messages, instant messaging and voice messages) which concern or are related in any way to the provision of telecommunications, the USF generally, or the Low-Income Program.
9. All Documents constituting the following records concerning each study area in which the Company operates:
 - a. All Documents providing or containing all records maintained by the Company related to or concerning each Customer’s personally identifiable information, such as a Customer’s account and records related to the Agent associated with the Customer. This includes, but is not limited to:
 - i. The account number of the Customer used by the Company.
 - ii. Customer name.
 - iii. All fields concerning any Customer address.
 - iv. Customer social security number.
 - v. Customer date of birth.
 - vi. All fields concerning Customer phone number(s).
 - vii. Whether the Customer was flagged as eligible for the tribal benefit.
 - viii. The order number, if applicable, assigned by the Company upon the initial enrollment of the Customer.
 - ix. The Agent who enrolled the Customer for service including such Agent’s name and agent code.

- x. Each Auditor who reviewed or audited the Application Materials of the Customer including such Auditor's name and code.
- xi. The basis on which the Agent determined the eligibility of the customer (e.g., "blue SNAP card" or "letter from State Health and Human Services Agency").
- xii. The date and time when the Agent enrolled the Customer.
- xiii. The date on which phone service to the Customer started.
- xiv. Any date(s) upon which phone service to the Customer was suspended, if applicable.
- xv. If applicable, the date on which phone service commenced again after being suspended.
- xvi. The phone number assigned to the customer after Lifeline service resumed, if different from the initial number.
- xvii. The date on which phone service ended, if applicable.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- b. All Documents, organized by study/service area and then by month, constituting, providing or containing all records maintained by the Company related to or concerning the Customers that supported each FCC Form 497.
- c. All Documents, organized by study/service area and then by month, constituting, providing or containing all records maintained by the Company related to or concerning the Customers that supported each FCC Form 555.

- d. All Documents providing or containing all records maintained by the Company related to or concerning each Customer's billing record, including all records related to each Customer's monthly billing statement. All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official. **Please note that, if the Company does not assess or collect a monthly fee from its Customers, then the OIG will accept a certification attesting to that in lieu of a response concerning billing records.**
- e. All Documents providing or containing all of the following records related to each Customer:
 - i. All applications of each Customer whether signed by the Customer or recorded by the Company or its representative.
 - ii. All certifications of each Customer whether signed by the Customer or recorded by the Company or its representative.
 - iii. All proofs of identification of the Customer maintained by the Company.
 - iv. All proofs of eligibility of the Customer maintained by the Company.
 - v. Any photograph of the Customer.
 - vi. All call, text and data records of the Customer (incoming and outgoing), as well as any other information used by the Company to satisfy the activation requirement and the usage requirements.
 - vii. All notifications by the Company to the Customer that a failure to use Lifeline service within the notice period will result in service termination for non-usage.

- viii. All notifications by the Customer to the Company to terminate service.
- ix. All Documents (including recordings) wherein the Customer, where applicable, agreed or authorized the Company to have such Customer's prior phone number ported to the Company.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- f. All Documents providing or containing all records maintained by the Company related to or concerning each Applicant's personally identifiable information, such Applicant's account and records related to the Agent associated with the Applicant. This includes, but is not limited to:
 - i. The date and time on which the Agent enrolled the Applicant.
 - ii. The marketing channel by which the Applicant filed an application, i.e., online, by phone, in-person direct selling (such as street teams), in-person indirect channels (such as retailers, e.g. convenience stores).
 - iii. Account number of the Applicant assigned by the Company.
 - iv. The order number, if applicable, assigned by the Company upon the initial enrollment of the Applicant.
 - v. The date(s) and time(s) in which the Company relayed information related to the Applicant to NLAD.
 - vi. All information relayed by the Company to NLAD related to the Applicant, including any overrides.
 - vii. The date(s) and time(s) in which the Company received information related to the Applicant from NLAD.

- viii. All information received by the Company from NLAD in response to the data submitted related to the Applicant, including any overrides.
- ix. The Agent who enrolled the Applicant including such Agent's name and agent code.
- x. The Auditor who reviewed or audited the Application Materials of the Applicant including such Auditor's name and code.
- xi. The basis on which the Agent determined the eligibility of the Applicant (e.g., "blue SNAP card" or "letter from State Health and Human Services Agency").

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- g. All Documents providing or containing all records maintained by the Company related to or concerning each Agent. This includes, but is not limited to:
 - i. The identification number or code of the Agent used by the Company.
 - ii. Agent name.
 - iii. All fields concerning Agent address
 - iv. Agent social security number.
 - v. Agent date of birth.
 - vi. Agent phone number.
 - vii. Any photograph of the Agent.

- viii. The date on which the identification number or code of the Agent was assigned.
- ix. The date on which the identification number or code of the Agent was deactivated or suspended and the reason why, if applicable.
- x. The date the Agent was terminated, if applicable.
- xi. The Primary Agent, Sub-Contractor Agent, or the department of the Company with which the Agent is associated.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- h. All Documents providing or containing all records maintained by the Company related to payments made, directly or indirectly, by the Company to an Agent. This includes, but is not limited to:
 - i. The amount of payment made to an Agent, directly or indirectly, in any calendar month by Customer.
 - ii. Bank account information, including account numbers, related to the payments the Company made to Agents. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or other lists of bank accounts may be provided in such format as approved by the OIG technical official the Company
 - iii. The dates that the Agent enrolled each Customer for which payments were made.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn

statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- i. All Documents providing or containing all records maintained by the Company related to the reviews or audits performed by each Auditor. This includes, but is not limited to:
 - i. The identification number or code of the Auditor used by the Company.
 - ii. The Auditor's name.
 - iii. The date and time the Auditor reviewed or audited the Application Materials of the Applicant.
 - iv. The account number of the Applicant used by the Company.
 - v. The order number, if applicable, assigned by the Company upon the initial enrollment of the Applicant.
 - vi. The name of the Applicant.
 - vii. The outcome of the Auditor's review or audit of the Application Material of the Applicant.
 - viii. The reason(s) provided by the Auditor for the outcome of the review or audit of the Application Material of the Applicant.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

10. All database schemas (including lists of data tables and fields) and data dictionaries for the databases used to maintain the records responsive to Request 9.

11. All Documents constituting, containing or identifying all reports, queries or analysis the Company or its agents perform in the normal course of business (i.e., daily, monthly or at some other interval) of the records of any of its Applicants, Customers, Agents or Auditors. In lieu thereof, the Company may provide a sworn statement with an accompanying spreadsheet that (i) identifies each such report, query or analysis, (ii) describes the data included in each such report, query or analysis, (iii) identifies the databases utilized to generate each such report, query or analysis, (iv) states how often each such report, query or analysis is performed and (v) lists the date of initial implementation of each such report, query or analysis.
12. All Documents constituting, containing or indicating or, in lieu thereof, a sworn statement that identifies the Sub-Contractor Agents that provide services to each Primary Agent as well as all contact information for each such Sub-Contractor Agent.
13. All Documents constituting any investigations, reports, audit or analysis conducted by the Company of any call center, Primary Agent or Sub-Contractor Agent related to or concerning, directly or indirectly, services or goods offered by the Company involving the Low-Income Program.
14. All Documents constituting, referring to, or relating to policies, procedures, marketing or business plans or practices related to the Low-Income Program:
15. All Documents constituting, referring to, or relating to correspondence or other communications with a member of the public concerning the unsolicited receipt of a telephone from the Company, its agent or independent contractor.
16. Records of cellular telephones returned to the Company by any mail delivery service in the United States (including, without limitation, USPS, UPS, FedEx, and DHL).



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

April 17, 2018

VIA CERTIFIED US MAIL
RETURN RECEIPT REQUESTED

(b) (6), (b)(7)(C)

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at (b) (7)(C), (b) (6)

Sincerely,

(b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

Attorney-Investigator

Enclosure

word “any.” Additionally, the word “each” shall be construed to include the word “every,” and the word “every” shall be construed to include the word “each.”

B. Relevant time period: Unless otherwise indicated, the relevant time period for this subpoena shall be for the period beginning on January 1, 2015 through the date of the subpoena, and shall include all Documents created or prepared during that period, or referring or relating to that period, regardless of when the Document was created or prepared.

C. Scope of search required: This subpoena calls for all Documents in the possession, custody or control of (b) (6), (b)(7)(C) and/or Federal Program Consulting, Inc., including, but not limited to, its managers, employees, agents, and contractors. (b) (6), (b)(7)(C) and/or Federal Program Consulting, Inc., is required to search all files reasonably likely to contain responsive Documents, including files left behind by former managers, employees, agents, and contractors including all Documents held by third parties at the direction of (b) (6), (b)(7)(C) and/or Federal Program Consulting, Inc. This search must include all offices, including, without limitation, offices maintained in homes of employees and offices and storage facilities in any remote locations.

D. If there are no Documents responsive to a particular subpoena request, provide a certification to that effect.

E. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.

SECTION III -REQUESTED DOCUMENTS

A. For the subpoena period, all communications and documents between (b) (6), (b)(7)(C) and/or Federal Program Consulting, Inc. and service providers seeking to participate in E-rate

competitive bidding process related to Charter Schools USA's FCC Forms 470 and 471 for E-rate Funding Years 2015, 2016, 2017 and 2018, without regard to whether the service providers were selected as the winning service providers in that Funding Year to supply E-rate equipment and services.

B. For the subpoena period, all communications and documents between (b) (6), (b)(7)(C) and/or Federal Program Consulting, Inc. and Charter School USA related to Charter Schools USA FCC Forms 470 and 471 for E-rate Funding Years 2015, 2016, 2017 and 2018. This request includes, but is not limited to communications and documents related to:

1. Assistance in the drafting of RFPs on behalf of Charter Schools USA,
2. Assistance in receiving bids from service providers
3. Assistance in reviewing bids submitted by service providers,
4. Assistance in selecting the winning bids submitted by service providers.

C. For the subpoena period, all documents used by (b) (6), (b)(7)(C) and/or Federal Program Consulting, Inc. and/or to generate FCC Form 470 and 471 requests or Requests for Proposals for E-rate Program-reimbursed work as well as all questions and answers regarding the Requests for Proposals or FCC Form 470s. Documents responsive to this request include, but are not limited to:

1. Communications regarding Charter Schools USA's needs for the upcoming E-rate Program Funding Year,
2. Evaluations of the Charter Schools USA's current technology needs or,
3. Other documents used by (b) (6), (b)(7)(C) and/or Federal Program Consulting, Inc. and/or Charter Schools USA to determine specific equipment and service needs as related to developing a Request for Proposal or FCC Form 470.



OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20554

May 4, 2018

SENT VIA FAX to 310-312-9513 and 310-312-9573

(b) (7)(C), (b) (6)

Namecheap, Inc. dba Namecheap.com
11400 W. Olympic Blvd., Suite 200
Los Angeles, CA 90064

RE: Federal Communications Commission Inspector General Subpoena

(b) (7)(C), (b) (6)

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at **(b) (7)(C), (b) (6)** or via email at **(b) (7)(C), (b) (6)**.

(b) (7)(C), (b) (6)

B. If there are no Documents responsive to a particular subpoena request, provide a certification to that effect.

C. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.

SECTION II -REQUESTED INFORMATION

All customer or subscriber account information for the following email and IP addresses:

1 (b) (7)(C), (b) (6)

2 (b) (7)(C), (b) (6);

3 (b) (7)(C), (b) (6)

or for any related accounts that fall within any of the following categories from January 1, 2018 until the present:

1. Names (including subscriber names, user names, and screen names);
2. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
3. Length of service (including start date) and types of service utilized;
4. Other subscriber number or identities (including the registration Internet Protocol ("IP") addresses); and
5. Means and source of payment for such service (including any credit card or bank account number).



OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20554

June 8, 2018

Via Certified US Mail
Return Receipt Requested

Webair Internet Development Company Inc.
333 Jericho Turnpike
Jericho, NY 11753-1100

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at (b) (7)(C), (b) (6) or via email at (b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

A large black rectangular redaction box covers the lower half of the page, starting below the contact information and extending to the bottom. The text '(b) (7)(C), (b) (6)' is printed in red at the top left of this redacted area.

C. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.

SECTION II -REQUESTED INFORMATION

All customer or subscriber account information for any and all accounts associated with the identifier listed below for March 5, 2018 through March 7, 2018:

1 (b) (7)(C), (b) (6)

In addition, for each such account, the information shall include the subscriber's:

1. Names (including subscriber names, user names, and screen names);
2. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
3. Length of service (including start date) and types of service utilized;
4. Other subscriber number or identities (including the registration Internet Protocol ("IP") addresses); and
5. Means and source of payment for such service (including any credit card or bank account number).

You are to provide this information, if less than 10,000 KB, via email to (b) (7)(C), (b) (6). If greater than 10,000 KB, please send the information as data files on CD-ROM or other electronic media.



OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20554

June 8, 2018

Via Certified US Mail
Return Receipt Requested

Stealthy Hosting
6619 5th Street CT NE
Tacoma, WA 98422-3922

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at (b) (7)(C), (b) (6) or via email at (b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

C. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.

SECTION II -REQUESTED INFORMATION

All customer or subscriber account information for any and all accounts associated with the following identifiers listed below for the period from March 8, 2018 through April 23, 2018:

1. (b) (7)(C), (b) (6)

■ [REDACTED]

■ [REDACTED]

In addition, for each such account, the information shall include the subscriber's:

1. Names (including subscriber names, user names, and screen names);
2. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
3. Length of service (including start date) and types of service utilized;
4. Other subscriber number or identities (including the registration Internet Protocol ("IP") addresses); and
5. Means and source of payment for such service (including any credit card or bank account number).



OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20554

June 8, 2018

Sent via Email

RapidVPN
1515 Round Table Drive
Dallas, TX 75247

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at (b) (7)(C), (b) (6) or via email at (b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

C. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.

SECTION II -REQUESTED INFORMATION

All customer or subscriber account information for any and all accounts associated with the following identifiers listed below for the period from March 7, 2018 through March 26, 2018:

1. (b) (7)(C), (b) (6)

2. (b) (7)(C), (b) (6)

■

■

■

■

In addition, for each such account, the information shall include the subscriber's:

1. Names (including subscriber names, user names, and screen names);
2. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
3. Length of service (including start date) and types of service utilized;
4. Other subscriber number or identities (including the registration Internet Protocol ("IP") addresses); and

5. Means and source of payment for such service (including any credit card or bank account number).

You are to provide this information, if less than 10,000 KB, via email to (b) (7)(C), (b) (6).
If greater than 10,000 KB, please send the information as data files on CD-ROM or other electronic media.

Failure to obey this subpoena shall be enforceable by order of the appropriate United States District Court.

Issued by: David L. Hunt Date: June 7, 2018
David L. Hunt by Amy Kestley, A161
Inspector General



OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20554

June 8, 2018

Via Certified US Mail
Return Receipt Requested

QuadraNet, Inc.
530 W 6th Street, Suite 901
Los Angeles, CA 90014

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at (b) (7)(C), (b) (6) or via email at (b) (7)(C), (b) (6).

(b) (7)(C), (b) (6)

C. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.

SECTION II -REQUESTED INFORMATION

All customer or subscriber account information for any and all accounts associated with the identifier listed below for February 14, 2018 through February 16, 2018:

1. (b) (7)(C), (b) (6)

In addition, for each such account, the information shall include the subscriber's:

1. Names (including subscriber names, user names, and screen names);
2. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
3. Length of service (including start date) and types of service utilized;
4. Other subscriber number or identities (including the registration Internet Protocol ("IP") addresses); and
5. Means and source of payment for such service (including any credit card or bank account number).

You are to provide this information, if less than 10,000 KB, via email to (b) (7)(C), (b) (6). If greater than 10,000 KB, please send the information as data files on CD-ROM or other electronic media.



OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20554

June 8, 2018

Via Certified US Mail
Return Receipt Requested

North American Cable Television and Internet, LLC
2885 Sanford Avenue, SW
Grandville, MI 49418

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at (b) (7)(C), (b) (6) email (b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

C. You must provide a privilege log to our office if you withhold any Document, or part thereof, responsive to this subpoena due to a claim of privilege. The privilege log must identify (i) the type of Document being withheld in whole or part (e.g., letter, memorandum, handwritten notes, marginalia, etc.), (ii) the author of the Document, (iii) all actual and intended recipients of the Document, (iv) its date, and (v) the specific privilege being asserted. All information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.

SECTION II -REQUESTED INFORMATION

All customer or subscriber account information for any and all accounts associated with the following identifiers listed below for the period from March 8, 2018 through April 23, 2018:

1. (b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

In addition, for each such account, the information shall include the subscriber's:

1. Names (including subscriber names, user names, and screen names);
2. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
3. Length of service (including start date) and types of service utilized;
4. Other subscriber number or identities (including the registration Internet Protocol ("IP") addresses); and
5. Means and source of payment for such service (including any credit card or bank account number).

You are to provide this information, if less than 10,000 KB, via email to (b) (7)(C), (b) (6). If greater than 10,000 KB, please send the information as data files on CD-ROM or other electronic media.



UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF INSPECTOR GENERAL

SUBPOENA DUCES TECUM

June 19, 2018

To: James Carpenter, President
Telrite Corporation d/b/a Life Wireless
1630 15th Street
Augusta, GA 30901

YOU ARE HEREBY COMMANDED, PURSUANT TO THE AUTHORITY OF THE INSPECTOR GENERAL ACT OF 1978, AS AMENDED (5 U.S.C. App. 3), TO PRODUCE DOCUMENTS identified in the attached **Subpoena Duces Tecum Attachment A** at such time and place as defined and instructed below.

DATE: July 20, 2018 at 5:00 p.m.

PLACE: Jay C. Keithley, Esq.
Assistant Inspector General for Investigations
Office of the Inspector General
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

In addition, production in response to this subpoena must follow the Federal Communications Commission Office of Inspector General Guidelines for Production, which are attached to this subpoena as **Subpoena Duces Tecum Attachment B**.

Among its duties, the FCC OIG conducts investigations relating to the programs of the Federal Communications Commission. As set forth in the subpoena, our office is authorized to issue subpoenas in order to gather all information, documents, reports, answers, records, accounts, papers, and other data in any medium (including electronically stored information, as well as any tangible thing) and documentary evidence which are necessary in the performance of our duties.

If you fail to comply with the subpoena, we are authorized to seek enforcement in the appropriate United States district court. 5a U.S.C. §6(a) (4). If such an order is obtained and you

N. **“Identified Customer”** means any Customer that is either (i) a Deceased Customer, or (ii) submitted by any Identified Agent that submitted five or more Deceased Customers.

O. **“Lifeline”** or the **“Low Income Program”** means the component of the Universal Service Fund set forth in 47 C.F.R. Part 54, Subpart E.

P. **“NLAD”** means the National Lifeline Accountability Database, established by USAC pursuant to 47 CFR §54.404.

Q. **“USAC”** means the Universal Service Administrative Company.

R. **“Subpoena”** means the subpoena to which this appendix is attached as well as all its appendixes and other attachments.

S. **“USF”** is the Universal Service Fund, a federal program implemented pursuant to 47 U.S.C. §254.

T. Any reference to “us,” “our,” or “we” herein, refers to the Office of Inspector General. Any reference to “you,” “your,” or “yours” refers to the Company and/or its representative(s).

U. The words “and” and “or” in this subpoena shall be read in both the conjunctive and the disjunctive (*i.e.*, “and/or”), so as to give the document request its broadest meaning. “Any” shall be construed to include the word “all,” and the word “all” shall be construed to include the word “any.” Additionally, the word “each” shall be construed to include the word “every,” and the word “every” shall be construed to include the word “each.”

SECTION III – REQUESTED DOCUMENTS

1. All Documents constituting, containing or referring to or, in lieu thereof, a sworn statement that shows the criteria or bases which the Company used to “activate” a Customer, including all Documents that indicate how Deceased Customers were activated.

2. All Documents constituting the following records concerning each study area in which the Company operates:
 - a. All Documents providing or containing all records maintained by the Company related to or concerning each Identified Customer's personally identifiable information, such as an Identified Customer's account and records related to the Agent associated with the Identified Customer. This includes, but is not limited to:
 - i. The account number of the Identified Customer used by the Company.
 - ii. Identified Customer name.
 1. Any prefix to the Identified Customer's name.
 2. Identified Customer's first name.
 3. Identified Customer's middle name.
 4. Identified Customer's last name.
 5. Any suffix to the Identified Customer's name.
 6. Any nickname of the Identified Customer.
 7. Any alternate name fields maintained by the Company.
 - iii. All fields concerning a Identified Customer address, including but not limited to:
 1. The Identified Customer address information provided to NLAD.
 2. The Identified Customer address of record for the Company.
 3. The Identified Customer mailing address.

4. The Identified Customer shipping address information.
 5. The applicable dates of such information.
- iv. Identified Customer social security number.
 - v. Identified Customer date of birth.
 - vi. Identified Customer phone number(s) assigned by the Company or provided to NLAD.
 - vii. The date(s) and time(s) in which the Company relayed information related to the Identified Customer to NLAD.
 - viii. The date(s) and time(s) in which the Company received information related to the Identified Customer from NLAD.
 - ix. All information relayed by the Company to NLAD related to the Identified Customer, including any overrides.
 - x. All information received by the Company from NLAD in response to the data submitted related to the Identified Customer, including any overrides.
 - xi. Type of service, *i.e.*, wireless or landline, received from the Company.
 - xii. Identified Customer alternate telephone number or contact number provided to the Company at the time of application.
 - xiii. Identified Customer email address.
 - xiv. Whether the Identified Customer was flagged as eligible for the tribal benefit.
 - xv. The order number, if applicable, assigned by the Company upon the initial enrollment of the Identified Customer.

- xvi. The Agents who enrolled the Identified Customer for service including such Agent's name and agent code.
- xvii. Each Auditor who reviewed or audited the Application Materials of the Identified Customer including such Auditor's name and code.
- xviii. The basis on which the Agent determined the eligibility of the Identified Customer (*e.g.*, "blue SNAP card" or "letter from State Health and Human Services Agency").
- xix. The date and time on which the Agent enrolled the Identified Customer.
- xx. The date on which phone service to the Identified Customer started.
- xxi. Any date(s) upon which phone service to the Identified Customer was suspended, if applicable.
- xxii. If applicable, the date on which phone service commenced again after being suspended.
- xxiii. The phone number assigned to the Identified Customer after Lifeline service resumed, if different from the initial number.
- xxiv. The date on which phone service ended, if applicable.
- xxv. The wholesale carrier from which the Identified Customer's line was purchased.
- xxvi. The telecommunications, data and text service plan(s) with which the Identified Customer was provided.
- xxvii. The marketing channel by which the Identified Customer filed an application, *i.e.*, online, by phone, in-person direct selling (such as street teams), in-person indirect channels (such as retailers, *e.g.* convenience stores).

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- b. All Documents, organized by study/service area and then by month, constituting, providing or containing all records maintained by the Company related to or concerning each Identified Customer supporting each FCC Form 497. This includes, but is not limited to:
 - i. The calendar month for which the FCC Form 497 was submitted.
 - ii. The Study Area for which the FCC Form 497 was submitted.
 - iii. The date upon which the FCC Form 497 was submitted.
 - iv. The following information concerning each Identified Customer underlying the FCC Form 497:
 - 1. The Identified Customer account number used by the Company.
 - 2. The Identified Customer name.
 - 3. All fields concerning the Identified Customer's address.
 - 4. Whether the Identified Customer was eligible for the tribal benefit.
 - 5. Whether the service provided to the Identified Customer was designated as voice, broadband, or bundled.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn

statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- c. All Documents, organized by study/service area and then by month, constituting, providing or containing all records maintained by the Company related to or concerning each Identified Customer supporting each FCC Form 555. This includes, but is not limited to:

- i. For each Identified Customer recertified because they were contacted directly to recertify eligibility through attestation:

- 1. The year being recertified.
 - 2. The Study Area for which the FCC Form 497 was submitted.
 - 3. The account number of the Identified Customer used by the Company.
 - 4. The Identified Customer name.
 - 5. The Identified Customer date of birth.
 - 6. All fields concerning the Identified Customer address.
 - 7. The means by which the Identified Customer was contacted.
 - 8. The number of times an Identified Customer was contacted prior to recertification.

- ii. For each Identified Customer recertified because they were reviewed by the state administrator, ETC access to an eligibility database or by USAC:

- 1. The year being recertified.
 - 2. The Study Area for which the FCC Form 497 was submitted.

3. The account number of the Identified Customer used by the Company.
 4. The Identified Customer name.
 5. The Identified Customer date of birth.
 6. All fields concerning Identified Customer address.
 7. The basis upon which the Identified Customer was recertified (*e.g.* the name of the state administrator or the eligibility database that the Company accessed or whether USAC performed the eligibility review).
- d. All Documents providing or containing all records maintained by the Company related to or concerning each Identified Customer's billing record, including all records related to each Identified Customer's monthly billing statement. This includes, but is not limited to:
- i. The account number assigned by the Company to the Identified Customer.
 - ii. The Identified Customer name.
 - iii. All fields concerning the Identified Customer address, including where each bill is sent. If the bill is sent through an alternate means, that means should be identified.
 - iv. The Identified Customer social security number.
 - v. The Identified Customer date of birth.
 - vi. The Identified Customer phone number assigned by the Company.
 - vii. The amount billed to an Identified Customer in each calendar month.

viii. The amount paid by an Identified Customer in each calendar month.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official. **Please note that, if the Company does not assess or collect a monthly fee from its Customers, then the OIG will accept a certification attesting to that in lieu of a response concerning billing records.**

- e. All Documents providing or containing all of the following records related to each Identified Customer:
- i. All applications of each Identified Customer whether signed by the Identified Customer or recorded by the Company or its representative.
 - ii. All certifications of each Identified Customer whether signed by the Identified Customer or recorded by the Company or its representative.
 - iii. All proofs of identification of the Identified Customer maintained by the Company.
 - iv. All proofs of eligibility of the Identified Customer maintained by the Company.
 - v. Any photograph of the Identified Customer.
 - vi. All call, text and data records of the Identified Customer (incoming and outgoing), as well as any other information used by the Company to satisfy the activation and the usage requirements.
 - vii. All notifications by the Company to the Identified Customer that a failure to use Lifeline service within the notice period will result in service termination for non-usage.

- viii. All notifications by the Identified Customer to the Company to terminate service.
- ix. All Documents (including recordings) wherein the Identified Customer, where applicable, agreed or authorized the Company to have such Identified Customer's prior phone number ported to the Company.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- f. All Documents providing or containing all records maintained by the Company for each Identified Customer related to or concerning each SIM Card used by the Company on any mobile network. For each SIM Card, this includes but is not limited to:
 - i. The unique serial number of the SIM Card.
 - ii. The date such SIM Card was activated on the network(s) used by the Company.
 - iii. The date such SIM Card was de-activated on the network(s) used by the Company.
 - iv. The telephone number associated with the SIM Card.
 - v. The account number of the Identified Customer associated with the SIM Card.
 - vi. The name of the Identified Customer associated with the SIM Card.
 - vii. The date of birth of the Identified Customer associated with the SIM Card.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- g. All Documents providing or containing all records maintained by the Company for each Identified Customer related to or concerning each telephone used by the Company on any mobile network. For each telephone, this includes but is not limited to:
 - i. The unique serial or identification number of the telephone.
 - ii. The manufacturer of the telephone.
 - iii. The model of the telephone.
 - iv. The date such telephone was provided to the Identified Customer.
 - v. The date such telephone was activated on the network(s) used by the Company.
 - vi. The date such telephone was de-activated on the network(s) used by the Company.
 - vii. The telephone number associated with the telephone.
 - viii. The account number of the Identified Customer associated with the telephone.
 - ix. The name of the Identified Customer associated with the telephone.
 - x. The date of birth of the Identified Customer associated with the telephone.

- h. All Documents providing or containing all records maintained by the Company related to or concerning each Identified Agent. This includes, but is not limited to:
 - i. The identification number or code of the Identified Agent used by the Company.
 - ii. The Identified Agent's name.
 - 1. Any prefix to the Agent's name.
 - 2. Agent's first name.
 - 3. Agent's middle name.
 - 4. Agent's last name.
 - 5. Any suffix to the Agent's name.
 - 6. Any nickname of the Agent.
 - 7. Any alternate name fields maintained by the Company.
 - iii. All fields concerning the Identified Agent's address, including but not limited to:
 - 1. The Agent's address of record.
 - 2. The Agent's mailing address.
 - 3. The applicable dates of such information.
 - iv. The Identified Agent's social security number.
 - v. The Identified Agent's date of birth.
 - vi. The Identified Agent's phone number.

- vii. The Identified Agent's alternate phone number.
- viii. The Identified Agent's fax number.
- ix. The Identified Agent's email address.
- x. Any other means of contacting the Identified Agent available to the Company.
- xi. Any photograph of the Identified Agent.
- xii. The date on which the identification number or code of the Identified Agent was assigned.
- xiii. The date on which the identification number or code of the Identified Agent was deactivated and the reason why, if applicable.
- xiv. Any date on which the identification number or code of the Identified Agent was suspended and the reason why, if applicable.
- xv. The date the Identified Agent was terminated, if applicable.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- i. All Documents providing or containing all records maintained by the Company related to payments made, directly or indirectly, by the Company to an Identified Agent for the enrollment of each Identified Customer. This includes, but is not limited to:
 - i. The identification number or code of the Identified Agent used by the Company.
 - ii. The Identified Agent's name.

- iii. The Identified Agent's social security number.
- iv. The amount of payment made to an Identified Agent, directly or indirectly, in any calendar month for the sign-up of the Identified Customer.
- v. The dates that the Identified Agent enrolled each Identified Customer for which payments were made.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- j. All Documents providing or containing all records maintained by the Company related to or concerning each Identified Auditor. This includes, but is not limited to:
 - i. The identification number or code of the Identified Auditor used by the Company.
 - ii. The Identified Auditor's name.
 - iii. All fields concerning the Identified Auditor's address
 - iv. The Identified Auditor's social security number.
 - v. The Identified Auditor's date of birth.
 - vi. The Identified Auditor's phone number.
 - vii. The Identified Auditor's alternate phone number.
 - viii. The Identified Auditor's fax number.
 - ix. The Identified Auditor's email address.

- x. Any other means of contacting the Identified Auditor available to the Company.
- xi. Any photograph of the Identified Auditor.
- xii. The date the Identified Auditor was terminated, if applicable.
- xiii. The company with which the Identified Auditor is associated.

All data above must be provided in native format and structure unless approved by the OIG technical official. In lieu of all Documents, a sworn statement accompanying electronic spreadsheets or databases may be provided in such format as approved by the OIG technical official.

- 3. All Documents constituting database schemas (including lists of data tables and fields) and data dictionaries for the databases used to maintain the records responsive to Request 2.
- 4. All Documents constituting agreements that the Company required each Identified Agent to sign prior to any interaction with Customers or Applicants.
- 5. All Documents constituting, containing or identifying all reports, queries or analysis the Company or its agents perform in the normal course of business (*i.e.*, daily, monthly or at some other interval) of the records of any of its Applicants, Customers, Agents or Auditors. In lieu thereof, the Company may provide a sworn statement with an accompanying spreadsheet (i) that identifies each such report, query or analysis, (ii) describes the data included in each such report, query or analysis, (iii) identifies the databases utilized to generate each such report, query or analysis, (iv) states how often each such report, query or analysis is performed and (v) lists the date of initial implementation of each such report, query or analysis.
- 6. All Documents constituting, referring to, or relating (i) all policies, procedures or practices concerning Deceased Customers or other customers who died after service by the Company was initiated and, (ii) the Company's utilization of the Household

Worksheet to enroll applicants in the Lifeline program. All Documents constituting records, not otherwise set forth above, related to or concerning Deceased Customers.

7. All Documents constituting communications of any type (including but not limited to, electronic mail (including as a cc or bcc recipient), text messages, instant messaging and voice messages) which concern or are related in any way to the enrollment or de-enrollment of Deceased Customers and the de-enrollment of other Customers that the Company was informed were deceased.



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

April 9, 2019

**VIA CERTIFIED US MAIL
RETURN RECEIPT REQUESTED**

Peach Springs Elementary
Unified School District #8
P.O. Box 360
Peach Springs, AZ 86434-0360

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at [REDACTED]

Sinc

(b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)
Attorney-Investigator

information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.

SECTION III - REQUESTED DOCUMENTS

A. For the relevant time period, all contracts or other agreements made between Peach Springs Elementary School and Wecom, Inc.

Each contract or other agreements responsive to this request should include any amendments, addenda, alterations, or extensions that effectuate the final contract or other agreement between Peach Springs Elementary School and Wecom, Inc.

B. For the relevant time period, all documents relating to Peach Springs Elementary School's FCC Form 470 requests or Requests for Proposals for E-rate Program-reimbursed work. Such documents include, but are not limited to, communications regarding Peach Springs Elementary School needs for the upcoming E-rate Program Funding Year, evaluations of the Peach Springs Elementary School's current technology needs and other documents used by the Peach Springs Elementary School to determine specific equipment and service needs.

C. For the relevant time period, all documents relating to Wecom, Inc.'s work at the Peach Springs Elementary School whether or not reimbursed by the E-rate Program.

D. For the relevant time period, all documents containing communications by the Peach Springs Elementary School with Wecom, Inc., whether or not related to E-rate Program-reimbursed equipment or services.

E. For the relevant time period, all documents relating to payments made by Peach Springs Elementary School to Wecom, Inc., including but not limited to invoices, receipts, purchase orders, and copies of checks.

F. For the relevant time period, all documents relating to payments made by Wecom, Inc., to Peach Springs Elementary School including but not limited to invoices, receipts, and copies of checks.



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

April 9, 2019

**VIA CERTIFIED US MAIL
RETURN RECEIPT REQUESTED**

Little Singer Community School
P.O. Box AQ
Winslow, AZ 16047-0310

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at [REDACTED]

Since [REDACTED] (b) (7)(C), (b) (6)

[REDACTED] (b) (7)(C), (b) (6)
Attorney-Investigator

Enclosure

SECTION III - REQUESTED DOCUMENTS

A. For the relevant time period, all contracts or other agreements made between Little Singer Community School and Wecom, Inc.

Each contract or other agreements responsive to this request should include any amendments, addenda, alterations, or extensions that effectuate the final contract or other agreement between Little Singer Community School and Wecom, Inc.

B. For the relevant time period, all documents relating to Little Singer Community School FCC Form 470 requests or Requests for Proposals for E-rate Program-reimbursed work. Such documents include, but are not limited to, communications regarding Little Singer Community School needs for the upcoming E-rate Program Funding Year, evaluations of the Little Singer Community School's current technology needs and other documents used by the Little Singer Community School to determine specific equipment and service needs.

C. For the relevant time period, all documents relating to Wecom, Inc.'s work at the Little Singer Community School whether or not reimbursed by the E-rate Program.

D. For the relevant time period, all documents containing communications by the Little Singer Community School with Wecom, Inc., whether or not related to E-rate Program-reimbursed equipment or services.

E. For the relevant time period, all documents relating to payments made by Little Singer Community School to Wecom, Inc., including but not limited to invoices, receipts, purchase orders, and copies of checks.

F. For the relevant time period, all documents relating to payments made by Wecom, Inc., to Little Singer Community School including but not limited to invoices, receipts, and copies of checks.

You are to provide this information, if less than 10,000 KB, via email to (b) (7)(C), (b) (6) If greater than 10,000 KB, please send the information as data files on CD-ROM or other electronic media.



OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20554

April 4, 2019

VIA CERTIFIED US MAIL
RETURN RECEIPT REQUESTED

Leupp School, Inc.
HC 61, Box D
Winslow, AZ 86035

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at [REDACTED]

Sincerely,

(b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

Attorney-Investigator

Enclosure

A. For the relevant time period, all contracts or other agreements made between Leupp School, Inc. and Wecom, Inc.

Each contract or other agreements responsive to this request should include any amendments, addenda, alterations, or extensions that effectuate the final contract or other agreement between Leupp School, Inc. and Wecom, Inc.

B. For the relevant time period, all documents relating to Leupp School, Inc.'s FCC Form 470 requests or Requests for Proposals for E-rate Program-reimbursed work. Such documents include, but are not limited to, communications regarding Leupp School, Inc. needs for the upcoming E-rate Program Funding Year, evaluations of the Leupp School, Inc.'s current technology needs and other documents used by the Leupp School, Inc. to determine specific equipment and service needs.

C. For the relevant time period, all documents relating to Wecom, Inc.'s work at the Leupp School, Inc. whether or not reimbursed by the E-rate Program.

D. For the relevant time period, all documents containing communications by the Leupp School, Inc. with Wecom, Inc., whether or not related to E-rate Program-reimbursed equipment or services.

E. For the relevant time period, all documents relating to payments made by Leupp School, Inc., to Wecom, Inc., including but not limited to invoices, receipts, purchase orders, and copies of checks.

F. For the relevant time period, all documents relating to payments made by Wecom, Inc., to Leupp School, Inc., including but not limited to invoices, receipts, and copies of checks.

You are to provide this information, if less than 10,000 KB, via email to (b) (7)(C), (b) (6) If greater than 10,000 KB, please send the information as data files on CD-ROM or other electronic media.



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

April 9, 2019

**VIA CERTIFIED US MAIL
RETURN RECEIPT REQUESTED**

Flagstaff Unified School District
3285 East Sparrow Avenue
Flagstaff, AZ 86004

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at [REDACTED]

Sinc

(b) (7)(C), (b) (6)
[REDACTED]
(b) (7)(C)
Attorney-Investigator

Enclosure

information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.

SECTION III - REQUESTED DOCUMENTS

A. For the relevant time period, all contracts or other agreements made between Flagstaff Unified School District and Wecom, Inc.

Each contract or other agreements responsive to this request should include any amendments, addenda, alterations, or extensions that effectuate the final contract or other agreement between Flagstaff Unified School District and Wecom, Inc.

B. For the relevant time period, all documents relating to Flagstaff Unified School District's FCC Form 470 requests or Requests for Proposals for E-rate Program-reimbursed work. Such documents include, but are not limited to, communications regarding Flagstaff Unified School District needs for the upcoming E-rate Program Funding Year, evaluations of the Flagstaff Unified School District's current technology needs and other documents used by the Flagstaff Unified School District to determine specific equipment and service needs.

C. For the relevant time period, all documents relating to Wecom, Inc.'s work at the Flagstaff Unified School District whether or not reimbursed by the E-rate Program.

D. For the relevant time period, all documents containing communications by the Flagstaff Unified School District with Wecom, Inc., whether or not related to E-rate Program-reimbursed equipment or services.

E. For the relevant time period, all documents relating to payments made by Flagstaff Unified School District to Wecom, Inc., including but not limited to invoices, receipts, purchase orders, and copies of checks.

F. For the relevant time period, all documents relating to payments made by Wecom, Inc., to Flagstaff Unified School District including but not limited to invoices, receipts, and copies of checks.



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

April 9, 2019

VIA CERTIFIED US MAIL
RETURN RECEIPT REQUESTED

Dilcon Community School, Inc.,
HC 63, Box G
Winslow, AZ 86047

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at [REDACTED]

Sincerely,

(b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

Attorney-Investigator

Enclosure

SECTION III - REQUESTED DOCUMENTS

A. For the relevant time period, all contracts or other agreements made between Dilcon Community School, Inc. and Wecom, Inc.

Each contract or other agreements responsive to this request should include any amendments, addenda, alterations, or extensions that effectuate the final contract or other agreement between Dilcon Community School, Inc. and Wecom, Inc.

B. For the relevant time period, all documents relating to Dilcon Community School, Inc.'s FCC Form 470 requests or Requests for Proposals for E-rate Program-reimbursed work. Such documents include, but are not limited to, communications regarding Dilcon Community School, Inc. needs for the upcoming E-rate Program Funding Year, evaluations of the Dilcon Community School, Inc.'s current technology needs and other documents used by the Dilcon Community School, Inc. to determine specific equipment and service needs.

C. For the relevant time period, all documents relating to Wecom, Inc.'s work at the Dilcon Community School, Inc. whether or not reimbursed by the E-rate Program.

D. For the relevant time period, all documents containing communications by the Dilcon Community School, Inc. with Wecom, Inc., whether or not related to E-rate Program-reimbursed equipment or services.

E. For the relevant time period, all documents relating to payments made by Dilcon Community School, Inc., to Wecom, Inc., including but not limited to invoices, receipts, purchase orders; and copies of checks.

F. For the relevant time period, all documents relating to payments made by Wecom, Inc., to Dilcon Community School, Inc., including but not limited to invoices, receipts, and copies of checks.

You are to provide this information, if less than 10,000 KB, via email to (b) (7)(C), (b) (6). If greater than 10,000 KB, please send the information as data files on CD-ROM or other electronic media.



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

April 9, 2019

VIA CERTIFIED US MAIL
RETURN RECEIPT REQUESTED

The STAR School
145 Leupp Road
Flagstaff, AZ 86004

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at [REDACTED]

(b) (7)(C), (b) (6)

Since

(b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)

Attorney-Investigator

Enclosure

A. For the relevant time period, all contracts or other agreements made between The STAR School and Wecom, Inc.

Each contract or other agreements responsive to this request should include any amendments, addenda, alterations, or extensions that effectuate the final contract or other agreement between The STAR School and Wecom, Inc.

B. For the relevant time period, all documents relating to The STAR School's FCC Form 470 requests or Requests for Proposals for E-rate Program-reimbursed work. Such documents include, but are not limited to, communications regarding The STAR School needs for the upcoming E-rate Program Funding Year, evaluations of the The STAR School's current technology needs and other documents used by the The STAR School to determine specific equipment and service needs.

C. For the relevant time period, all documents relating to Wecom, Inc.'s work at the The STAR School whether or not reimbursed by the E-rate Program.

D. For the relevant time period, all documents containing communications by the The STAR School with Wecom, Inc., whether or not related to E-rate Program-reimbursed equipment or services.

E. For the relevant time period, all documents relating to payments made by The STAR School to Wecom, Inc., including but not limited to invoices, receipts, purchase orders, and copies of checks.

F. For the relevant time period, all documents relating to payments made by Wecom, Inc., to The STAR School including but not limited to invoices, receipts, and copies of checks.

You are to provide this information, if less than 10,000 KB, via email to (b) (7)(C), (b) (6) If greater than 10,000 KB, please send the information as data files on CD-ROM or other electronic media.



OFFICE OF INSPECTOR GENERAL
Washington, D.C. 20554

April 9, 2019

VIA CERTIFIED US MAIL
RETURN RECEIPT REQUESTED

Topock Elementary School
5083 Tule Drive
Topock, AZ 86436

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at (b) (7)(C), (b) (6)

Sinc (b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)
Attorney-Investigator

Enclosure

SECTION III - REQUESTED DOCUMENTS

A. For the relevant time period, all contracts or other agreements made between Topock Elementary School Inc. and Wecom, Inc.

Each contract or other agreements responsive to this request should include any amendments, addenda, alterations, or extensions that effectuate the final contract or other agreement between Topock Elementary School and Wecom, Inc.

B. For the relevant time period, all documents relating to Topock Elementary School's FCC Form 470 requests or Requests for Proposals for E-rate Program-reimbursed work. Such documents include, but are not limited to, communications regarding Topock Elementary School needs for the upcoming E-rate Program Funding Year, evaluations of the Topock Elementary School's current technology needs and other documents used by the Topock Elementary School to determine specific equipment and service needs.

C. For the relevant time period, all documents relating to Wecom, Inc.'s work at the Topock Elementary School whether or not reimbursed by the E-rate Program.

D. For the relevant time period, all documents containing communications by the Topock Elementary School with Wecom, Inc., whether or not related to E-rate Program-reimbursed equipment or services.

E. For the relevant time period, all documents relating to payments made by Topock Elementary School to Wecom, Inc., including but not limited to invoices, receipts, purchase orders, and copies of checks.

F. For the relevant time period, all documents relating to payments made by Wecom, Inc., to Topock Elementary School, including but not limited to invoices, receipts, and copies of checks.

You are to provide this information, if less than 10,000 KB, via email to (b) (7)(C), (b) (5) [REDACTED]. If greater than 10,000 KB, please send the information as data files on CD-ROM or other electronic media.



OFFICE OF INSPECTOR GENERAL

Washington, D.C. 20554

April 9, 2019

**VIA CERTIFIED US MAIL
RETURN RECEIPT REQUESTED**

**Tuba City Unified School District #15
P.O. Box 67
Tuba City, AZ 86045**

RE: Federal Communications Commission Inspector General Subpoena

To Whom It May Concern:

Enclosed please find a *Subpoena Duces Tecum* issued by this office for the records requested therein. If you have any questions, including questions regarding the method of producing materials responsive to the subpoena, please contact me at [REDACTED].

Sincerely,

(b) (7)(C), (b) (6)

(b) (7)(C), (b) (6)
Attorney-Investigator

Enclosure

information must be provided with sufficient particularity so as to allow the Inspector General, and potentially a court, to assess the validity of the claim of privilege.

SECTION III - REQUESTED DOCUMENTS

A. For the relevant time period, all contracts or other agreements made between Tuba City Unified School District #15 and Wecom, Inc.

Each contract or other agreements responsive to this request should include any amendments, addenda, alterations, or extensions that effectuate the final contract or other agreement between Tuba City Unified School District #15 and Wecom, Inc.

B. For the relevant time period, all documents relating to Tuba City Unified School District #15 FCC Form 470 requests or Requests for Proposals for E-rate Program-reimbursed work. Such documents include, but are not limited to, communications regarding Tuba City Unified School District #15 needs for the upcoming E-rate Program Funding Year, evaluations of the Tuba City Unified School District #15 current technology needs and other documents used by the Tuba City Unified School District #15 to determine specific equipment and service needs.

C. For the relevant time period, all documents relating to Wecom, Inc.'s work at the Tuba City Unified School District #15 whether or not reimbursed by the E-rate Program.

D. For the relevant time period, all documents containing communications by the Tuba City Unified School District #15 with Wecom, Inc., whether or not related to E-rate Program-reimbursed equipment or services.

E. For the relevant time period, all documents relating to payments made by Tuba City Unified School District #15 to Wecom, Inc., including but not limited to invoices, receipts, purchase orders, and copies of checks.

F. For the relevant time period, all documents relating to payments made by Wecom, Inc., to Tuba City Unified School District #15 including but not limited to invoices, receipts, and copies of checks.

You are to provide this information, if less than 10,000 KB, via email to (b) (7)(C), (b) (6) If greater than 10,000 KB, please send the information as data files on CD-ROM or other electronic media.

Failure to obey this subpoena shall be enforceable by order of the appropriate United States District Court.

Issued by: David L. Hunt Date: 4/9/19
David L. Hunt
Inspector General