



truconnect™

# Law Enforcement Handbook

May 4, 2016

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## Introduction

TruConnect is a national provider of wireless voice, messaging, and data services. Additional information about TruConnect and its products and services is available at [www.truconnect.com](http://www.truconnect.com).

TruConnect assists law enforcement agencies in their investigations while protecting subscriber privacy as required by law and applicable privacy policies. The main federal statutes that TruConnect must conform to when releasing subscriber information are: The Electronic Communications Privacy Act (18 U.S.C. §§ 2510-2522, 2701-2712, 3121-3127); Communications Assistance for Law Enforcement Act (47 U.S.C. §§ 1001-1010); and the Telecommunications Act of 1996 (particularly, 47 U.S.C. § 222 pertaining to customer proprietary network information or CPNI). TruConnect also complies with all applicable state and federal laws.

TruConnect's primary goal is to provide timely and accurate responses to all law enforcement and governmental agency requests. TruConnect has qualified personnel who are responsible for complying with legal requests made to TruConnect. Unless otherwise required by the request, TruConnect's goal is to provide a response within five (5) business days of each request.

Note: This Handbook is provided for informational purposes only. TruConnect expressly reserves the right to add, change, or delete any information contained in this Handbook at any time and without notice. Furthermore, TruConnect reserves the right to respond or object to, or seek clarification of, any legal requests and treat legal requests for subscriber information.

## **Subpoena, Search Warrant, Court Order Contact Information:**

### **TruConnect Business Office Addresses:**

#### **California:**

TruConnect Communications, Inc.  
1149 S. Hill Street, Suite H400  
Los Angeles, CA 90015

#### **All Other Jurisdictions:**

Sage Telecom Communications, LLC d/b/a TruConnect  
10440 N. Central Expressway, Suite 700  
Dallas, TX 75231

### **Emergency Requests (NOC)**

888-757-3559

### **Send Completed Emergency Disclosure Forms To:**

[EmergencyDisclosures@truconnect.com](mailto:EmergencyDisclosures@truconnect.com)

#### **Fax**

214-279-2160

### **Subpoenas, Search Warrants, and Court Orders:**

All Subpoenas, Search Warrants, and Court Orders must be properly served either in person at our business office or via our Registered Agent for service of process. **Subpoenas, Search Warrants, and Court Orders will NOT be accepted via Fax.**

### **Registered Agent for Service of Process:**

#### **California**

Corporation Service Company  
2710 Gateway Oaks Drive, Suite 150N, Sacramento, CA 95833-3505

#### **Texas**

Corporation Service Company d/b/a CSC-Lawyers Incorporated  
211 E. 7<sup>th</sup> Street, Suite 620, Austin, TX 78701-3218

### **Inquiries regarding Subpoenas, Search Warrants, and Court Orders:**

Email: [SubpoenaRequests@truconnect.com](mailto:SubpoenaRequests@truconnect.com)

Telephone: 214-495-4723

### **Main POC for Responding to/Handling Subpoena Requests:**

Cassandra Milligan

Email: [SubpoenaRequests@truconnect.com](mailto:SubpoenaRequests@truconnect.com)

Phone: 214-495-4723

# **Subscriber Account Identification**

## Subscriber Account Identification

For identification based upon a *telephone number*:

- TruConnect can only provide account information on telephone numbers for which we currently or have historically provided service.

For identification based upon an *Internet Protocol (IP) Address*:

TruConnect is unable to search using IP addresses.

For identification based upon an *email address*:

TruConnect does not provide email address to subscribers. As such, TruConnect will not have information responsive to the request.

For identification based upon a *person's name*:

TruConnect cannot identify a subscriber based upon a name alone. It is necessary to include the street address, account number, phone number or other identifiable information where it is believed the individual receives service. It may be possible in some cases to identify a subscriber based on name and a city and state (with no street address).

TruConnect will only respond to a request for identification based on the name exactly as it is written on the request. If initials or nickname are used you should add a request for those variations of the name in your legal request.

For identification based upon a *street address*:

It is necessary to provide an entire street address. In the request, please supply the house or apartment number, the street name, the city, state, and the zip code of the location you have targeted.

Over a length of time it is possible that TruConnect has supplied service to multiple customers at the same address. Therefore, it is necessary to narrow a search for customer identity to a specific period of time.

# **Retention Policies**

## **TruConnect Retention Policies**

### **Email Account Information for email contents and attachments**

TruConnect does not provide subscribers with email addresses and as such would not be able to provide email information.

### **Call Detail Records**

TruConnect maintains historical call detail records for our Voice telephone service for eighteen (18) months. This includes local, local toll, and long distance records. In limited instances, older records may be available, but will require additional time and resources to retrieve.

# **Legal Requests**

## **Types of Requests**

Generally, the following information, when available to TruConnect, can be supplied in response to the types of requests listed below. Each request is evaluated and reviewed on a case by case basis in light of any special procedural or legal requirements and applicable laws. The following examples are for illustration only.

**Important Note on Email Communications:** TruConnect does not provide subscribers with email addresses and as such would not be able to provide email information.

### **Court Order or Search Warrant {both signed by a Judge}**

Law enforcement agencies are able to obtain subscriber identification including:

1. Subscriber's name
2. Subscriber's address
3. Length of service including start date
4. Subscriber's telephone number, instrument number or other subscriber number or identity.
5. Call Detail (records of local and long distance calling connections)
6. Means and source of payment for such service (would only be able to provide the name on the credit/debit card and the last four digits of the card number).

### **Emergency Disclosure**

18 U.S.C. §2702(b)(8) and §2702(c)(4) allows TruConnect to divulge subscriber information, if TruConnect, in good faith, believes that an emergency involving danger of death or serious physical injury may occur if the information is not provided quickly.

These requests must go through TruConnect's Emergency Request number and are only fulfilled if the requestor provides TruConnect with the information on the Emergency Disclosure Form. The Emergency Disclosure Form can be found on TruConnect's website [www.truconnect.com](http://www.truconnect.com), requested by sending an email to [EmergencyDisclosures@truconnect.com](mailto:EmergencyDisclosures@truconnect.com).

### **Subpoena**

Law enforcement agencies are able to receive subscriber identification, including the following items, without notice to the subscriber:

1. Subscriber's name
2. Subscriber's address
3. Length of service including start date
4. Subscriber's telephone number, instrument number or other

- subscriber number or identity.
5. Call Detail (records or local and long distance calling connections)
  6. Means and source of payment for such service (would only be able to provide the name on the credit/debit card and the last four digits of the card number).

### **Preservation of Records Request**

Title 18 U.S.C. § 2703(f) and 2704 provides a mechanism for law enforcement agencies to request TruConnect to preserve subscriber data already in its possession and not on an ongoing, continual basis, until an appropriate legal order is obtained. No information can be released until TruConnect receives a valid legal request. The information will be retained for ninety days upon which, if no valid legal request is received, or no authorized ninety day extension is sought, the information will be permanently deleted. If an extension is sought, the information will be retained for an additional ninety days upon which, if no valid legal request is made, the information will be permanently deleted.

### **Other**

Wiretaps, Interception of Communications, Pen Register/Trap, Trace Device and Internet Protocol (IP) information requests are not available through TruConnect and must be submitted to the underlying carrier.

# **Reimbursement Fees**

## Reimbursement Fees

Type of Request	Fee
Subscriber Information	\$25.00 per number
Call Detail Records Less than 30 Days	\$5.00 per number
Call Detail Records More Than 30 Days	\$10.00 per month per number
Legal Document Responses	\$0.10 per screen print
Diskette/CD	\$10 processing fee

# Appendix

**Attachment #1**

Emergency Disclosure Form

In order to release information to a member of a law enforcement agency or a governmental entity in an emergency situation involving danger of death or serious physical injury, TruConnect must first obtain the following information.

- Name of Requestor:
- Title:
- Badge Number:
- Name of Agency or Governmental Entity:
- Address:
- Telephone Number:
- Fax Number:
- Email Address:

What is the emergency that involves immediate danger of death or serious physical injury?

What information is being provided to look up subscriber? (i.e. Telephone Number, Name, etc.)

What information is being requested? (i.e. Name, Address, etc.)

**Indemnification**

**I acknowledge that this request is made solely as a result of immediate danger of death or serious physical injury and that the information shall not be obtained shared or disseminated for any unlawful or harmful purpose. I affirm the above information, represents that I have authority to execute this form and agree to indemnify and hold TruConnect, its subsidiaries, employees, and agents harmless for any claim, demand, loss or injury, including attorneys' fees brought against TruConnect by a third party, including the subscriber, as a result of TruConnect's compliance with this request.**

**I declare under penalty of perjury that the foregoing is true and correct.**

\_\_\_\_\_  
Requestor Signature

\_\_\_\_\_  
Date

Please send this completed form, on your department letterhead, to [EmergencyDisclosures@truconnect.com](mailto:EmergencyDisclosures@truconnect.com) or fax to (214) 279-2160.