

Decision PROPOSED DECISION OF ALJ CLARK (Mailed 5/1/2026)

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

In the Matter of the Joint Application of Platinum Equity Capital Partners IV, L.P. and SCRS Intermediate Holding Corporation, Requesting Expedited Approval of Indirect Transfer of Control of Securus Technologies, LLC (U-6888-C) Pursuant to California Public Utilities Code Section 854(a).

Application 25-05-016

**DECISION APPROVING INDIRECT TRANSFER OF CONTROL OF SECURUS TECHNOLOGIES, LLC TO SCRS INTERMEDIATE HOLDING CORPORATION SUBJECT TO CONDITION**

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**DECISION APPROVING INDIRECT TRANSFER OF CONTROL  
OF SECURUS TECHNOLOGIES, LLC TO SCRS INTERMEDIATE  
HOLDING CORPORATION SUBJECT TO CONDITION**

**Summary**

Pursuant to Public Utilities Code Section 854(a), this decision approves the joint application for transfer of indirect control of Securus Technologies, LLC (U-6888-C) to SCRS Intermediate Holding Corporation, subject to the terms and conditions set forth in the Ordering Paragraphs.

Application 25-05-016 is closed.

**1. Factual Background**

Platinum Equity Capital Partners IV, L.P. (Transferor or Platinum Equity) and SCRS Intermediate Holding Corporation (Transferee or SCRS Intermediate HC) (collectively, Joint Applicants) request approval of the indirect transfer of control of regulated entity Securus Technologies, LLC (U-6888-C) (Securus) pursuant to California Public Utilities (Pub. Util.) Code Section 854(a). The Joint Applicants state that their application is filed as part of an out-of-court restructuring transaction, which will significantly reduce the debt obligations of Aventiv Technologies, LLC (Aventiv), Securus's parent company. The Joint Applicants represent that the transaction will allow Securus to continue providing Incarcerated People's Communications Services (IPCS) without interruption, and approving the application is consistent with the public interest.

**1.1. Parties to the Transaction**

The Joint Applicants are Platinum Equity and SCRS Intermediate HC. Through the transaction, indirect control of the licensee, Securus, will be transferred to SCRS Intermediate HC. In addition, the application discusses

Aventiv, Securus' parent company, which holds debt that will be equitized into voting and equity interests per the terms of the proposed transaction. We discuss all four of these entities here.

#### **1.1.1. Platinum Equity Capital Partners IV, L.P.**

The Transferor, Platinum Equity, a Delaware limited partnership, is a private equity investment vehicle that currently holds a controlling 72.63% interest in Securus.<sup>1</sup> Platinum Equity holds this controlling interest through its direct ownership of SCRS Holding Corporation, which owns the Transferee, SCRS Intermediate HC. SCRS Intermediate HC owns both Securus and its parent company, Aventiv.<sup>2</sup> Platinum Equity is sponsored by Platinum Equity, LLC, a global investment firm that specializes in acquiring and operating companies across a broad range of industries, including telecommunications.<sup>3</sup> Platinum Equity's registered business address is 360 North Crescent Drive South Building, Beverly Hills, CA 90210.<sup>4</sup>

#### **1.1.2. SCRS Intermediate Holding Corporation**

The Transferee, SCRS Intermediate HC, a Delaware corporation, is a holding company currently controlled by SCRS Holding Corporation and ultimately, the Transferor, Platinum Equity.<sup>5</sup> After the transaction is completed, the Transferee will become the ultimate controlling parent of the licensee,

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<sup>1</sup> Application at 3.

<sup>2</sup> *Id.* at 3 and Exhibit C.

<sup>3</sup> *Id.* at 3.

<sup>4</sup> *Ibid.*

<sup>5</sup> *Ibid.*

Securus, and its parent company, Aventiv.<sup>6</sup> SCRS Intermediate HC's principal place of business is c/o Platinum Equity, 360 North Crescent Drive South Building, Beverly Hills, CA 90210.<sup>7</sup>

### **1.1.3. Securus Technologies, LLC**

Securus, a Delaware limited liability company, has a certificate of public convenience and necessity (CPCN) granted under Decision (D.) 04-05-049 to provide resold interexchange telecommunications services as a non-dominant interexchange carrier.<sup>8</sup> Securus was granted a CPCN to provide resold interexchange telecommunications services as a non-dominant interexchange carrier, with the corporate identification number U-6888-C, pursuant to D.04-05-049, under its prior name, Evercom Systems, Inc. Securus notified the Commission of its name change via Advice Letter No. 3, effective October 21, 2010. Through this authority, Securus provides prepaid debit cards to incarcerated persons in correctional facilities across California.<sup>9</sup> Securus is a

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<sup>6</sup> *Id.* at 4.

<sup>7</sup> *Ibid.*

<sup>8</sup> *Id.* at 4-5.

<sup>9</sup> *Id.* at 5; *see also* Reporter's Transcript of Prehearing Conference page 6: lines 15-21. In their application and at the PHC, the Joint Applicants assert that in addition to providing debit card services pursuant to its CPCN, Securus also provides non-interconnected VoIP services. TURN disputes the characterization of these additional services as non-interconnected. As set forth in the Scoping Memo, the issue of whether or not Securus provides other services that are non-interconnected is out of the scope of this proceeding, and this decision does not address this issue.

wholly owned subsidiary of Aventiv.<sup>10</sup> Securus is headquartered at 5360 Legacy Drive, Suite 300, Plano, TX 75024.<sup>11</sup>

#### **1.1.4 Aventiv Technologies, LLC**

Aventiv, Securus's parent company, provides technology and connectivity solutions for correctional facilities, law enforcement agencies, and incarcerated people.<sup>12</sup> Under the terms of the transaction, approximately \$1.202 billion of Aventiv's existing first lien debt and approximately \$367 million of Aventiv's existing second lien secured term loans will be equitized into a collective 100% direct voting and equity interest in the Transferee, SCRS Intermediate HC, and a collective 100% indirect voting and equity interest in Aventiv.<sup>13</sup>

#### **1.2. The Proposed Transaction**

Under the terms of the proposed transaction, SCRS Intermediate HC will become the ultimate controlling parent of Aventiv and thereby the licensee, Securus.<sup>14</sup> The proposed transaction will cause approximately \$1.202 billion of Aventiv's existing first lien debt (held by entities referred to in the application as the First Lien Lenders) and approximately \$367 million of Aventiv's existing second lien secured term loans (held by entities referred to in the application as the Second Lien Lenders) to be equitized into voting and equity interests in the Transferee, SCRS Intermediate HC.<sup>15</sup> Following the proposed transaction, the

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<sup>10</sup> Application at 5.

<sup>11</sup> *Ibid.*

<sup>12</sup> *Ibid.*

<sup>13</sup> *Id.* at 8.

<sup>14</sup> *Id.* at 4.

<sup>15</sup> *Id.* at 8.

debt held by the First and Second Lien Lenders will be extinguished, and the First Lien Lenders will collectively hold approximately 97.5% direct voting and equity interest in SCRS Intermediate HC and approximately a 97.5% indirect voting and equity interest in Aventiv, and thereby Securus.<sup>16</sup> The Second Lien Lenders will collectively hold an approximate 2.5% direct voting and equity interest in SCRS Intermediate HC and an approximate 2.5% indirect voting and equity interest in Aventiv, and thereby Securus.<sup>17</sup> The pre- and post-transfer organizational charts for the proposed transaction are included as Appendix A to this decision.

Collectively, the First and Second Lien Lenders will hold 100% of the direct voting and equity interests in the Transferee, SCRS intermediate HC, and 100% indirect voting and equity interests in Aventiv.<sup>18</sup> No lender is contemplated to hold, directly or indirectly, greater than 20% or more of the equity or voting interests in SCRS Intermediate HC or Aventiv, or exercise *de facto* control.<sup>19</sup> SCRS Intermediate HC will have a seven-member board of directors, initially elected by a majority vote of the common stockholders of SCRS Intermediate HC.<sup>20</sup> Thereafter, all directors shall be elected by a plurality of votes at each annual meeting of stockholders.<sup>21</sup>

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<sup>16</sup> *Ibid.*

<sup>17</sup> *Ibid.*

<sup>18</sup> *Ibid.*

<sup>19</sup> *Ibid.*

<sup>20</sup> *Ibid*; see also Joint Applicants' Aug. 15, 2025 Response to ALJ's Ruling at Attachment A.

<sup>21</sup> Application at 8.

## 2. Procedural Background

On May 23, 2025, Joint Applicants filed the instant transfer of control application. The application included a request for expedited approval,<sup>22</sup> but did not include the attachment demonstrating specific facts that constitute either a threat to public safety or the need to resolve a financial matter expeditiously to avoid ratepayer harm, as required by Rule 2.9 of the Commission's Rules of Practice and Procedure (Rules). Alongside the application, Joint Applicants filed a motion to file under seal certain information contained within Exhibits D and E to the application.

On June 30, 2025, The Utility Reform Network (TURN) filed a protest to the application. On July 10, 2025, the Joint Applicants filed a reply to the protest.

On August 5, 2025, the assigned Administrative Law Judge (ALJ) held a prehearing conference (PHC) that was attended by the Joint Applicants and TURN. At the PHC, the Joint Applicants sought leave to provide a supplemental request for expedited approval that provided specific facts pursuant to Rule 2.9, which the ALJ granted. At the PHC, the ALJ also directed the Joint Applicants to provide the names and biographies of the Transferee's management, SCRS Intermediate HC. On August 15, 2025, the Joint Applicants filed a response to the supplemental information requested by the ALJ, as well as a supplemental request for expedited approval. The Joint Applicants also filed a motion to file under seal information contained in the Joint Applicants' supplemental request for expedited approval.

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<sup>22</sup> *Id.* at 2.

On September 24, 2025, the assigned Commissioner issued the Scoping Memo and Ruling (Scoping Memo) setting forth the issues and schedule for the proceeding. In the Scoping Memo, the assigned Commissioner found that Joint Applicants failed to demonstrate specific facts supporting an expedited schedule and denied the request.

On October 8, 2025, the ALJ issued a ruling requesting that the Joint Applicants provide additional information regarding disclosures pursuant to the verification required by D.13-05-035.

On October 10, 2025, the Joint Applicants and TURN each served opening testimony.

On October 17, 2025, the Joint Applicants filed a motion to strike portions of TURN's opening testimony on the grounds that it was out of the scope of the proceeding.

On October 22, 2025, the Joint Applicants filed a response to the ALJ's October 8, 2025, ruling requesting additional information.

On October 30, 2025, TURN filed a response to the Joint Applicant's motion to strike.

On November 7, 2025, Joint Applicants and TURN each served rebuttal testimony.

On November 12, 2025, TURN filed a motion requesting evidentiary hearings.

On November 13, 2025, Joint Applicants filed a reply to TURN's response to Joint Applicants October 17, 2025, motion to strike.

On November 19, 2025, Joint Applicants filed a response to TURN's motion for evidentiary hearings.

On November 21, 2025, the ALJ issued a ruling granting TURN's motion for evidentiary hearings, setting the evidentiary hearing on December 16, 2025, from 9:30 a.m. to 4:30 p.m., and providing evidentiary hearing instructions.

On November 24, 2025, Joint Applicants filed a motion to strike portions of TURN's rebuttal testimony. Alongside the motion, Joint Applicants filed a motion to file under seal confidential information included in their motion to strike portions of TURN's rebuttal testimony.

Also on November 24, 2025, Joint Applicants filed a response to the assigned ALJ's November 12, 2025, ruling requiring additional information.

On December 5, 2025, TURN filed a response to the Joint Applicants' motion to strike portions of its rebuttal testimony.

On December 11, 2025, the Joint Applicants filed a reply to TURN's response to Joint Applicants' November 24, 2025 motion to strike.

On December 12, 2025, the ALJ denied Joint Applicants' October 17, 2025 and November 24, 2025 motions to strike portions of TURN's opening testimony and rebuttal testimony. The ruling also granted Joint Applicants' motion to file under seal confidential information included in their motion to strike portions of TURN's rebuttal testimony.

On December 16, 2025, the evidentiary hearing was held. At the evidentiary hearing, Joint Applicants and TURN moved to admit evidence, which the ALJ granted.

On December 22, 2025, TURN filed a motion to de-designate as confidential the Joint Applicants' response to TURN Data Request 4-4, which was admitted into the record during the evidentiary hearing as exhibit TRN-27X-C.

On December 29, 2025, TURN filed a motion to de-designate portions of the evidentiary hearing transcript as confidential.

On December 31, 2025, Joint Applicants filed responses to TURN's motions to de-designate Joint Applicants' response to TURN Data Request 4-4 and portions of the evidentiary hearing transcript as confidential.

On January 9, 2026, the ALJ granted TURN's motions to de-designate Joint Applicants' response to TURN Data Request 4-4 and portions of the evidentiary hearing transcript as confidential. The ruling also required the court reporter to file a revised evidentiary hearing transcript, removing the redactions from the portions of the transcript that were de-designated as confidential by the ruling.

On January 13, 2026, the Joint Applicants emailed the ALJ and the service list asking for suspension of the January 9, 2026, ruling to allow Joint Applicants time to file a motion for reconsideration. On January 14, 2026, the ALJ stayed the January 9, 2026, ruling until 5:00 p.m. on January 16, 2026.

On January 16, 2026, the Joint Applicants filed a motion for reconsideration of the ALJ's January 9, 2025, ruling.

On January 21, 2026, the ALJ denied the Joint Applicants' motion for reconsideration.

On January 22, 2026, the court reporter filed a revised evidentiary hearing transcript removing the redactions from the portions of the transcript that were de-designated as confidential by the ALJ's January 9, 2026 ruling.

On January 27, 2026, the Joint Applicants and TURN each filed opening briefs. Concurrently with the filing of their opening brief, Joint Applicants filed a motion for leave to file under seal a confidential version of Joint Applicants' opening brief.

On February 10, 2026, the Joint Applicants and TURN each filed reply briefs.

On April 23, 2026, the Joint Applicants filed a notice to update the record, stating that David Abel, Aventiv's Chief Executive Officer, resigned effective April 20, 2026 and that Kevin Elder, Aventiv's President, would be assuming the role of Interim Chief Executive Officer, in addition to his current role as president.

### **3. Submission Date**

This matter was submitted upon filing of the reply briefs on February 10, 2026.<sup>23</sup> On April 23, 2026, Joint Applicants filed a notice to update the record stating that David Abel, Aventiv's Chief Executive Officer, resigned effective April 20, 2026, and that Kevin Elder, Aventiv's President, would be assuming the role of Interim Chief Executive Officer, in addition to his current role as President. Kevin Elder's professional biography was previously provided to the Commission in Exhibit F to the application. TURN did not dispute Mr. Elder's

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<sup>23</sup> Scoping Memo at 6.

technical qualifications. Because this notice does not constitute a materially disputed fact or argument, the submission date remains February 10, 2026.

#### **4. Jurisdiction**

Transferor, Platinum Equity, is a private equity investment vehicle that holds a majority indirect interest in Securus, a telephone corporation with a CPCN that authorizes it to provide resold interexchange services throughout California.<sup>24</sup>

Pursuant to Pub. Util. Code Section 854, Commission authorization is required for the proposed transfer of indirect ownership of Securus to SCRS Intermediate HC. After the transfer of Securus to SCRS Intermediate HC is completed, control of the CPCN will effectively transfer to SCRS Intermediate HC. SCRS Intermediate HC agrees to be subject to the Commission's authority for indirectly controlling Securus.

#### **5. Issues Before the Commission**

The issues in this proceeding are as follows:

1. Does the application meet all Commission requirements sufficient to grant authorization for the transfer of control, including compliance with Public Utilities Code Section 854(a) and Rule 3.6?
2. Are conditions of approval necessary to protect and promote the public interest?
3. Does the proposed transfer align with the Commission's Environmental and Social Justice Plan?

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<sup>24</sup> *Id.* at 5 [citing D.04-05-049].

## 6. Standard of Review

Joint Applicants seek approval of the transaction pursuant to Pub Util. Code Section 854(a), which requires Commission authorization before a public utility may “merge, acquire, or control either directly or indirectly any public utility organized and doing business in this state.” The purpose of this and related code sections is to enable the Commission, before any transfer of public utility authority is consummated, to review the proposal and to take such action, as a condition of the transfer, as the public interest may require.<sup>25</sup>

The Commission has broad discretion under Pub Util. Code Section 854 to approve or reject a proposed transaction. If necessary and appropriate, the Commission may attach conditions of approval to a transaction to protect and promote the public interest.<sup>26</sup>

## 7. The Public Interest

The primary question in a transfer of control proceeding under Pub. Util. Code Section 854(a) is whether a transaction will be in the public interest.

### 7.1. Joint Applicants’ Contentions

Joint Applicants argue that the proposed transaction is not adverse to the public interest. Specifically, Joint Applicants state that the proposed transaction will significantly reduce the debt obligations of Securus’s parent company, Aventiv, and will enable Securus to continue providing incarcerated persons communications services.<sup>27</sup> Joint Applicants further note that reducing Aventiv’s

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<sup>25</sup> See D.18-04-008 at 5.

<sup>26</sup> *Ibid.*

<sup>27</sup> Application at 14.

debt will have other public interest benefits. Joint Applicants state that deleveraging will allow Securus to better redirect resources to benefit consumers, such as investing in system upgrades, improved customer support systems, and new technologies.<sup>28</sup>

Joint Applicants further state that the proposed transaction will not result in any changes in service and will be “imperceptible” from the customer perspective.<sup>29</sup> Joint Applicants state they do not expect the proposed transaction to change Securus’s current rates/price lists, terms and conditions of service, or customer contracts.<sup>30</sup> Joint Applicants also expect that Securus will continue to be managed and operated by primarily the same officers and key personnel.<sup>31</sup>

## **7.2. TURN’s Contentions**

TURN, in contrast, argues that Joint Applicants fail to demonstrate that the proposed transaction is in the public interest.<sup>32</sup> TURN asserts that reducing debt obligations is not enough to create a public interest in the proposed transaction. According to TURN, merely reducing Aventiv’s debt is insufficient to make the company viable and Securus may have to address financial shortfalls by increasing customer rates.<sup>33</sup> TURN also argues that Securus may exploit customer data to make up for any financial gaps post-transaction.<sup>34</sup> More

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<sup>28</sup> Joint Applicants’ Opening Brief at 12.

<sup>29</sup> *Id.* at 12-13; *see also* Application at 14.

<sup>30</sup> Application at 13.

<sup>31</sup> *Id.* at 11.

<sup>32</sup> TURN Opening Brief at 16-18.

<sup>33</sup> TURN Exhibit 15 at 5.

<sup>34</sup> TURN Exhibit 1 at 24-27.

generally, TURN asserts that SCRS Intermediate HC may prioritize cost reductions and financial gains over customer needs.<sup>35</sup>

TURN also argues that the proposed transaction will result in less transparency and uncertainty, as it remains unclear what entities would, in the short or long term, assume a controlling interest in SCRS Intermediate HC.<sup>36</sup> They also raise concerns that the post-restructuring secured debt does not represent the fair value of the company because the private, out-of-court nature of the proposed transaction lacks transparency, as compared to a bankruptcy filing.<sup>37</sup>

### **7.3 Discussion**

After reviewing the arguments and testimony of Joint Applicants and TURN, we do not find support in the record for the harms TURN alleges. We are not persuaded that the record demonstrates that the proposed transaction will likely result in increased prices or negative impacts to the services that Securus provides. We also do not find support for TURN's concerns that the proposed transaction will result in cost-cutting measures or harms to Securus's customers' privacy, which TURN bases largely on Aventiv's pre-transaction policies on

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<sup>35</sup> *Id.* at 26; TURN Opening Brief at 21.

<sup>36</sup> TURN Opening Brief at 23-24; TURN Exhibit 1 at 15-16.

<sup>37</sup> TURN Exhibit 1 at 12-13.

customer data,<sup>38</sup> and the prior experience of SCRS Intermediate HC's prospective board of directors.<sup>39</sup>

The application states that the change in ownership will be “seamless” and is not expected to change Securus’s current prices, terms and conditions of service, or customer contracts.<sup>40</sup> Based on this expectation, it appears that the proposed transaction will result in Securus continuing to operate and contribute to California’s telecommunications marketplace and that the transaction will not impact Securus’s ability to meet its public utility obligations. However, we do acknowledge that the record on this point is based largely on Securus’s expectation that Securus’s current prices, terms and conditions of service, or customer contracts will remain unchanged due to the proposed transaction. Given this, as well as the concerns that TURN has raised, we find it reasonable to impose a condition that requires Securus to report changes to its terms and conditions of service that occur within two years of the transfer, which we discuss in more detail later in this decision. With this condition, we believe the record supports the transaction is in the public interest.

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<sup>38</sup> TURN Opening Testimony at 25-26.

<sup>39</sup> TURN argues that prospective board members Jorge Dominicis and Valerie Montgomery Rice’s prior involvement with Wellpath Holdings, Inc., which was the subject of multiple lawsuits relating to Wellpath’s provision of medical care, will result in Securus using IPCS customers’ medical data for profit or trying to avoid legal accountability for injuries to customers from that use. (TURN Exhibit 1 at 26 [citing TURN Exhibit 13].) TURN also argues that board member Tara Prakriya’s work in the field of Artificial Intelligence (AI) will result in Securus using IPCS customers’ personal data in AI projects. (*Ibid* [citing TURN Exhibit 14].) We do not find evidence in the record to support these conclusions.

<sup>40</sup> Application at 13.

Additionally, we do not find support in the record for TURN's concerns that the proposed transaction lacks transparency or certainty, which will harm the public interest. While bankruptcy may provide more transparency than the proposed transaction, there is no evidence to support that the current transaction is insufficient. As discussed more below, the Joint Applicants have provided the required information on the proposed transaction, the qualifications of the Transferee, and disclosures sufficient to grant a transfer of control.

Further, we do not agree with TURN that the lack of a controlling entity will harm the public interest. As discussed below, Joint Applicants have met the requirements for a transfer of control application by providing disclosures pursuant to D.13-05-035 for entities with an ownership of more than 10% in the Transferee. Moreover, if an entity wishes to acquire a controlling interest in the Transferee in the future and/or gains any actual or working control over the day-to-day business of Securus, that entity would need to seek the Commission's approval for the change in indirect control.<sup>41</sup>

Therefore, subject to the condition we set forth below, we find that the transfer of indirect control of Securus from Transferor Platinum Equity to Transferee SCRS Intermediate HC, is in the public interest.

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<sup>41</sup> See D.08-12-021 at 7-13 (finding that when evaluating whether an indirect transfer constitutes a transfer of control, the Commission should look to factors including 1) whether the acquiring entity's equity interest in the utility or parent will be greater than 50%, 2) whether the acquiring entity has the power to appoint a majority of the members of the board of directors or to direct management of the utility or its parent entity, and 3) whether the acquiring entity has actual or working control of the day-to-day business of the utility).

**8. Rule 3.6**

Rule 3.6 sets forth requirements for the contents of applications to acquire or control a utility under Pub. Util. Code Sections 851 through 854. Rule 3.6(c) specifies that such an application shall contain “detailed reasons upon the part of each applicant for entering into the proposed transaction, and all facts warranting the same.”

TURN contends that the application fails to meet the requirements of Rule 3.6(c) for the same reasons that they allege that the proposed transaction will not be in the public interest: TURN argues that the Joint Applicants fail to substantiate that the proposed transaction will result in public interest benefits, will not harm impacted communities, or will result in no changes to Securus’s users’ services.<sup>42</sup>

We find that the application meets the requirements of Rule 3.6(c). The application sets forth that the proposed transaction will reduce Aventiv’s debt obligations by over a billion dollars and allow Securus to continue providing services without interruption.<sup>43</sup> Moreover, as discussed elsewhere in this decision, the record supports that, with the condition imposed in this decision, the proposed transaction will be in the public interest.

**9. CPCN Criteria**

When a company that does not possess a CPCN desires to acquire a company that does, the Commission applies the same requirements to the acquiring company as would be applied to an applicant seeking the type of

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<sup>42</sup> TURN Opening Brief at 25.

<sup>43</sup> See Application at 2, 7-8.

CPCN held by the acquired company. An applicant that desires to operate as a provider of resold interexchange services must demonstrate that it has met the financial, technical qualifications, certification, and CEQA requirements of a CPCN holder, as discussed below.

### **9.1 Financial Qualifications**

To be granted a CPCN, an applicant for authority to provide resold interexchange services must demonstrate that it has a minimum of \$25,000 cash equivalent, reasonably liquid and readily available to meet the firm's start-up expenses.<sup>44</sup> An applicant must also demonstrate that it has \$25,000 to cover all deposits required by local exchange carriers and/or interexchange carriers in order to provide the proposed service.<sup>45</sup> SCRS Intermediate HC satisfies this requirement by providing an irrevocable guarantee for a period of at least 12 months after the Commission grants control of Securus.<sup>46</sup> TURN did not challenge the Joint Applicants' financial qualifications.

### **9.2 Technical Qualifications**

An acquiring entity must also make a reasonable showing of technical expertise in telecommunications or a related business. SCRS Intermediate HC supplied biographical information of its prospective board of directors. This information demonstrates sufficient expertise in telecommunications and related business.<sup>47</sup>

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<sup>44</sup> D.24-11-003 at 54-56, Appendix F.

<sup>45</sup> *Id.* at 54, Appendix F.

<sup>46</sup> Application at Exhibit D.

<sup>47</sup> Joint Applicants' Aug. 15, 2025 Response to ALJ's Ruling at Attachment A.

TURN states that “the Commission lacks information regarding how the new indirect ownership will have the technical, operational and financial expertise to manage Securus.”<sup>48</sup> However, beyond this statement, TURN provides no evidence that SCRC Intermediate HC’s board of directors lacks the technical expertise to support this application.

We find that the biographical information SCRS Intermediate HC provided for its prospective board of directors demonstrates sufficient technical expertise and training to operate as a telecommunications provider.

### **9.3 Certification Requirements**

An acquiring entity must attest that no affiliate, officer, director, partner, agent, or owner (directly or indirectly) of more than 10% of the acquiring company, or any person acting in a management capacity for that company, has:

- a. held one of these positions with a company that filed for bankruptcy;
- b. been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others;
- c. been convicted of a felony;
- d. been (to their knowledge) the subject of a criminal referral by a judge or public agency;
- e. had a telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction;
- f. personally entered into a settlement, or held one of these positions with a company that has entered into

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<sup>48</sup> TURN Opening Brief at 21.

settlement of criminal or civil claims involving violations of [Sections] 17000 *et seq.*, [Sections] 17200 *et seq.*, or [Sections] 17500 *et seq.* of the California Business & Professions Code, or of any other statute, regulation, or decisional law relating to fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; or

- g. been found to have violated any statute, law, or rule pertaining to public utilities or other regulated industries; or
- h. entered into any settlement agreements or made any voluntary payments or agreed to any other type of monetary forfeitures in resolution of any action by any regulatory body, agency, or attorney general.<sup>49</sup>

Also, the acquiring entity must attest that to the best of its knowledge, neither the acquiring entity, nor any affiliate, officer, director, partner, nor owner of more than 10%, or any person acting in such capacity whether or not formally appointed, is being, or has been investigated by the Federal Communications Commission (FCC) or any law enforcement or regulatory agency for failure to comply with any law, rule or order.<sup>50</sup>

During this proceeding, the Joint Applicants disclosed that Deutsche Bank, which would hold an approximate 14.5% equity interest in SCRS Intermediate HC,<sup>51</sup> has been the subject of, or involved with, regulatory actions, investigations, enforcement actions, and litigation.<sup>52</sup> Specifically, Joint Applicants describe 27

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<sup>49</sup> D.13-05-035, Ordering Paragraph 14.

<sup>50</sup> *Ibid.*

<sup>51</sup> TURN Exhibit 27X-R.

<sup>52</sup> Joint Applicants' Nov. 24, 2025 Response to ALJ's Ruling at 3.

disclosures with regard to Deutsche Bank that set forth various settlements, investigations, or lawsuits that have taken place in the United States or internationally from January 1, 2017, to the present.<sup>53</sup> None of these disclosures involves investigations or enforcement by the FCC or the Commission. TURN did not allege that the Joint Applicants failed to meet the certification requirements because of this disclosure.

Given that the record shows that Deutsche Bank will have only a minimal role, if any, in the day-to-day management of Securus,<sup>54</sup> we find that these disclosures do not pose a barrier to this instant application.<sup>55</sup>

Additionally, Joint Applicants disclosed that two prospective board members of SCRS Intermediate HC have held positions at a company that filed for bankruptcy. Joint Applicants disclosed that Jorge Dominicus served as Chief Executive Officer and Chair of Wellpath Holdings, Inc. (Wellpath), from 2018 to May 2025, and Valerie Montgomery Rice served as a director of Wellpath and served on its Compliance Committee.<sup>56</sup> Wellpath filed for Chapter 11 bankruptcy in November 2024 and successfully emerged from bankruptcy on May 9, 2025.<sup>57</sup> TURN did not allege that the Joint Applicants failed to meet the certification requirements because of this disclosure. We again find that these

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<sup>53</sup> *Id.* at 3-28.

<sup>54</sup> Application at 11; Joint Applicants' Aug. 15, 2025 Response to Assigned ALJ's Ruling at 2.

<sup>55</sup> As noted above, the Commission has found that when an acquiring entity gains actual or working control of the day-to-day business of the utility it constitutes a transfer of control that requires Commission approval. (*See* D.08-12-021 at 7-13.)

<sup>56</sup> Joint Applicants' Aug. 15, 2025 Response to ALJ's Ruling at Attachment B, p. 1.

<sup>57</sup> *Ibid.*

disclosures do not pose a barrier to this application. Joint Applicants demonstrated transparency in disclosing the information about the prospective board members.

Therefore, we find that the disclosures that SCRS Intermediate HC has made provide sufficient basis to approve the application.

## **10. CEQA**

When telecommunications providers seek to construct or install facilities, the Commission acts as the designated lead agency under CEQA to assess the project's potential environmental impacts and, to the extent feasible, mitigate any significant impacts.<sup>58</sup>

The indirect transfer of control at issue in this application proposes no new construction and requests no authority for future construction; it is merely a "paper transaction," with no potential to have any significant impact on the environment.<sup>59</sup> Accordingly, the application is exempt from CEQA review. The Transferee, SCRS Intermediate HC, must submit a new application should it propose the construction of facilities other than those within the authority to resell interexchange services granted to Securus as a nondominant interexchange carrier under its utility identification number U-6888-C.

## **11. Alignment with Commission's Environmental and Social Justice Plan**

Joint Applicants contend that the proposed transaction is consistent with the Commission's Environmental and Social Justice (ESJ) Action Plan's goal of

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<sup>58</sup> Public Resources Code §§ 21000, *et seq.*

<sup>59</sup> *See* Application at 7-8, 9-10; *see also* Cal. Code Regs., tit. 14, § 15061(b)(3) (CEQA exemption provisions).

expanding access to reliable communications services in disadvantaged communities.<sup>60</sup> Joint Applicants elaborate that this transaction will be seamless to Securus's users, including those in ESJ communities, and that it will not create disproportionate burdens or impacts on ESJ communities.<sup>61</sup> Further, Joint Applicants state that by reducing Aventiv's debt obligations, the proposed transaction will "improve operational stability and maintain or enhance service quality for incarcerated individuals," thereby improving reliable access to incarcerated individuals from ESJ communities.<sup>62</sup>

TURN argues that the proposed transaction will create impediments to incarcerated individuals in ESJ communities from accessing affordable and reliable communications services, in conflict with Goal 3.4 of the Commission's ESJ Plan.<sup>63</sup> Specifically, TURN alleges that the proposed transaction may result in price increases or service changes that will disproportionately harm ESJ communities.<sup>64</sup> Additionally, TURN argues that the Joint Applicants fail to support that the proposed transaction will benefit incarcerated persons and, therefore, persons in ESJ communities.<sup>65</sup> TURN further argues that in light of these harms to ESJ communities, the Commission should adopt the conditions of approval they advocate (discussed in detail below) to ensure that Securus's

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<sup>60</sup> Joint Applicants' Opening Brief at 16.

<sup>61</sup> *Ibid.*; see also Application at 13.

<sup>62</sup> Joint Applicants' Opening Brief at 16 (citing Joint Applicants Exhibit 1 at 8-9).

<sup>63</sup> TURN's Opening Brief at 43-44.

<sup>64</sup> *Id.* at 44-45.

<sup>65</sup> *Id.* at 44.

services are affordable, of high quality, and do not impact users' privacy interests.<sup>66</sup>

We find that the proposed transaction is consistent with the Commission's ESJ Plan. Contrary to TURN's assertions, the record reflects that the proposed transaction will be "seamless" and is not expected to change Securus's current prices, terms and conditions of service, or customer contracts.<sup>67</sup> Moreover, the record reflects that the reduction in the debt obligations of Securus's parent company, Aventiv, will allow Securus to better redirect resources to benefit consumers, such as investing in system upgrades, improved customer support systems, and new technologies.<sup>68</sup> Given this support in the record, we find that the proposed transaction is consistent with Goal 3.4 of the Commission's ESJ Plan to improve "access to essential communications services at affordable rates."<sup>69</sup>

## **12. Conditions of Approval**

TURN proposes numerous conditions of approval that it argues are necessary to protect the public interest. Joint Applicants argue that conditions are unnecessary. We have considered each of the conditions that TURN proposes, and find no basis to conclude that many of the harms that these conditions are designed to prevent will actually occur as a result of this

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<sup>66</sup> *Id.* at 45.

<sup>67</sup> Application at 13.

<sup>68</sup> Joint Applicants' Opening Brief at 12.

<sup>69</sup> CPUC Environmental & Social Justice Action Plan at 24.

transaction.<sup>70</sup> Additionally, we find many of the conditions that TURN proposes overlap with existing Commission reporting requirements or address issues out of the scope of this proceeding. However, we do find it reasonable to require Securus to report any changes to its terms and conditions that occur within two years following the transfer. We discuss each proposed condition below.

### **12.1 Reporting Conditions**

TURN proposes that the Commission adopt numerous reporting requirements for this proceeding.

First, TURN recommends that the Commission require ongoing reporting of Securus's post-transaction ownership.<sup>71</sup> TURN argues that this reporting is necessary to fill the "information vacuum" caused by what it characterizes as the untransparent nature of the proposed transaction.<sup>72</sup>

As discussed above, we do not find that the record supports that these harms will occur. As a part of this proceeding, the Joint Applicants have disclosed the ownership of the Transferee post-transaction.<sup>73</sup> In the event that any entity acquires sufficient control of the Transferee, and thereby an indirect controlling interest in Securus, that entity would need to seek Commission approval for that transaction.<sup>74</sup> Moreover, current annual affiliate reporting

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<sup>70</sup> See, e.g., D.05-11-029 at 112 ("[W]e find no basis upon which to conclude that such adverse consequences which these conditions are designed to mitigate would result from this transaction.") and 113 (finding that proposed conditions cannot be justified if they are neither needed to "prevent serious adverse consequences" or do not represent "reasonable options").

<sup>71</sup> TURN Opening Brief at 28.

<sup>72</sup> *Id.* at 29; TURN Exhibit 1 at 15-16

<sup>73</sup> See TURN Exhibit 27X-R.

<sup>74</sup> See D.08-12-021 at 7-13.

requirements already require disclosure of the utilities' controlling corporation.<sup>75</sup> Given the lack of evidence of harm and these existing Commission requirements, we decline to impose an ownership reporting requirement here.

Additionally, TURN asks the Commission to require service quality reports,<sup>76</sup> and reports on changes to Securus' rates.<sup>77</sup> TURN argues that these reporting requirements are necessary to ensure that the proposed transaction does not result in harm to Securus's users' rates, service quality, or privacy interests.<sup>78</sup> However, as discussed above, we do not find that the record supports that the proposed transaction is likely to result in these harms. In fact, the record shows that the proposed transaction is not expected to change Securus's current rates/price lists or the services it provides its users.<sup>79</sup> As discussed below, if any changes to Securus' terms and conditions occur within two years of the transfer of control, we will require Securus to report that to the Commission. We therefore decline to impose these conditions of approval.

Further, TURN asks that the Commission require Securus to provide annual financial reports for any services it provides that fall outside Securus's current CPCN for resold interexchange services.<sup>80</sup> CPCN holders such as

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<sup>75</sup> See D.93-02-019 at Appendix A, p. 8 (requiring utilities to submit corporate organizational chart including controlling corporation at top of chart).

<sup>76</sup> TURN Opening Brief at 32-35.

<sup>77</sup> *Id.* at 40-41.

<sup>78</sup> *Id.* at 32-41.

<sup>79</sup> Application at 13-14.

<sup>80</sup> TURN Opening Brief at 30-32.

Securus are already required to provide annual financial reporting.<sup>81</sup> Moreover, as outlined in the Scoping Memo, the issue of whether additional services provided by Securus are regulated by the Commission is outside the scope of this proceeding.<sup>82</sup> Therefore, we decline to impose this condition.

Finally, TURN requests that the Commission require that Securus report any changes to its terms and conditions, specifically its privacy policy.<sup>83</sup> TURN argues that this condition is needed to ensure that the proposed transfer does not harm Securus's users' service quality or privacy interests.<sup>84</sup> As we have discussed above, we do not find that the record supports that the proposed transaction will result in harmful changes to Securus's terms and conditions. However, this finding is based in large part on the Joint Applicants' representations that the proposed transaction is not expected to result in any changes to Securus's terms and conditions or the services it provides.<sup>85</sup>

In light of this, we find it reasonable and in the public interest to impose a condition that Securus must submit a Tier 1 advice letter(s) informing the Commission of any changes to its terms and conditions that occur within two years of the effective date of the transfer of control. The advice letter(s) shall describe any changes to the terms and conditions and provide 1) a clean copy of the previous terms and conditions, 2) a clean copy of the new terms and

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<sup>81</sup> GO 104-A.

<sup>82</sup> Scoping Memo at 3.

<sup>83</sup> TURN Opening Brief at 38.

<sup>84</sup> *Id.* at 32-41.

<sup>85</sup> Application at 13-14.

conditions, and 3) a redline copy of the changes to the terms and conditions. The advice letter(s) shall be filed with the Communications Division in accordance with General Order 96-B 30 days prior to the effective date of the changes to the terms and conditions.

## **12.2 Affordability Conditions**

In addition to reporting requirements, TURN proposes two conditions related to affordability:

- a. a rate cap to prohibit Securus from raising its prices,<sup>86</sup> and
- b. a requirement that Securus disclose to its users the availability and potential eligibility for federal and state Lifeline programs.<sup>87</sup>

As discussed above, the record does not support a finding that the proposed transaction will increase Securus's rates or prices, or any other harms that would justify the imposition of these conditions. Moreover, the Commission has already imposed rate caps on IPCS providers pursuant to D.26-04-004.

Therefore, we decline to impose these conditions.

## **12.3 Privacy-Related Conditions**

TURN also proposes two additional privacy-related conditions:

- a. a requirement that the Joint Applicants provide all Securus users with "a clear mechanism to exercise their rights under the California Consumer Privacy Act (CCPA);" and
- b. a categorical prohibition on Securus "from training or otherwise developing its AI [artificial intelligence] tools or

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<sup>86</sup> TURN Opening Brief at 39-41.

<sup>87</sup> *Id.* at 41.

products using recordings, data or metadata of minors or children and non-incarcerated users.”<sup>88</sup>

As discussed above, the record does not support a finding that the proposed transaction will result in the use of Securus’s users’ data in ways that harm their privacy interests. We therefore have no basis to impose these conditions.

### **13. Conclusion**

The proposed transfer of control of Securus to SCRS Intermediate HC with the condition discussed above is in the public interest, meets the requirements for the Commission to grant CPCN authority to provide resold interexchange telecommunications services in California, and is exempt from CEQA. We therefore grant the application pursuant to Pub. Util. Code Section 854(a), subject to the condition set forth above and in the ordering paragraphs.

### **14. Summary of Public Comment**

Rule 1.18 allows any member of the public to submit written comments in any Commission proceeding using the “Public Comment” tab of the online Docket Card for that proceeding on the Commission’s website. Rule 1.18(b) of the Commission’s Rules of Practice and Procedure requires that relevant written comments submitted in a proceeding be summarized in the final decision issued in that proceeding.

No public comments were received in the “Public Comment” tab of the online Docket Card for this proceeding.

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<sup>88</sup> *Id.* at 38.

## 15. Procedural Matters

In support of the application, Joint Applicants provided Exhibits D and E containing financial information about SCRS Intermediate HC and Securus. These documents are granted confidential treatment for a period of three years without the need to file a motion for confidential treatment.<sup>89</sup> During this three-year period, this information shall not be publicly disclosed except on further Commission order or ALJ ruling. If the Joint Applicants believe that it is necessary for this information to remain under seal for longer than three years, the Joint Applicants may file a motion showing good cause for extending this order by no later than 30 days before the expiration of the grant of confidentiality.

On August 15, 2025, and January 27, 2026, Joint Applicants filed motions for leave to file under seal confidential portions of their August 15, 2025, response to the ALJ's request for supplemental information and their reply brief. Both these motions allege that these portions of the filings contain competitively sensitive, non-public information about the Joint Applicants and the proposed transaction. The filings were submitted in accordance with the requirements of General Order (GO) 66-D, Section 3.3 (Submissions in Formal Proceedings) and Rule 11. No objections were filed. After reviewing the confidential information and the motions for leave to file under seal, we find sufficient cause exists to grant the Joint Applicants' August 15, 2025, and January 27, 2026, motions for leave to file under seal.

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<sup>89</sup> D.24-11-003 at 48-54; GO 66-D.

Requests for confidential treatment have been submitted for exhibits APP-1, TRN-01C, TRN-15C, TRN-3C, TRN-16C, TRN-17C, TRN-18C, TRN-20C, and TRN-28X-C.<sup>90</sup> The requests are supported by declarations setting forth the basis for confidentiality, and each document designates the portion of the information that is to be treated as confidential, consistent with the requirements set forth in GO 66-D. After reviewing the exhibits, we find that they contain financial information designated confidential by D.24-11-003, or commercially sensitive, non-public information about the proposed transaction or the Joint Applicants' business operations and/or strategies. Joint Applicants and TURN also state that the information is subject to the terms of non-disclosure agreements between the Joint Applicants and TURN, and do not dispute that the exhibits should be treated confidentially. We therefore grant the requests for confidential treatment of these exhibits.

This decision affirms all rulings made by the ALJ and assigned Commissioner in this proceeding. All motions not ruled on are deemed denied.

#### **16. Comments on Proposed Decision**

The proposed decision of ALJ Shannon Clark in this matter was mailed to the parties in accordance with Section 311 of the Pub. Util. Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. TURN filed comments on May 21, 2026, and Joint Applicants filed reply comments on May 26, 2026.

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<sup>90</sup> TURN Exhibit 27X-C was de-designated as confidential and marked and admitted as exhibit TRN-27X-R pursuant to the assigned ALJ's January 9, 2026 ruling.

After reviewing the comments provided, we adopt one substantive change to the proposed decision to reset the submission date to February 10, 2026 – the day reply briefs were filed. We also make corrections to non-substantive typographical errors. We decline to adopt all other recommendations and discuss our reasons for doing so below. Per Rule 14.3(c), we give no weight to comments that fail to focus on factual, legal or technical errors, or merely re-argue a party's position.

TURN argues that the proposed decision errs by “shifting the burden of proof” from the Joint Applicants to TURN. We find no basis for this claim. The proposed decision finds that the application and the record demonstrate that the Joint Applicants meet the requirements sufficient for the Commission to grant the transfer of control. After examining the entire record, including the arguments and evidence submitted by TURN, the proposed decision finds that the proposed transfer is in the public interest.

TURN also requests several modifications to the condition imposed by the proposed decision. First, TURN proposes that the reporting period of the condition be extended to five years, rather than two. We decline to adopt this change. The two-year period included in the proposed decision reflects a period immediately following the transfer when changes to Securus' terms and conditions caused by the transfer could reasonably be expected to occur. We find no basis to extend this period further. Second, TURN proposes that the condition should be modified to require Securus to submit a Tier 2 or Tier 3 advice letter. TURN argues that a Tier 2 or 3 advice letter is more appropriate because under Telecommunications Industry Rule 7.1 of G.O. 96-B, matters

appropriate for a Tier 1 advice letter include “changes to the text of a tariff that does not affect a rate, charge, term or condition.” While we acknowledge this general rule for tariffed entities, we find that a Tier 1 advice letter is more appropriate here, where the scope of the changes to Securus’ terms and conditions are unknown, and changes may not take place at all.

Third, TURN proposes amending the condition to specify that Securus must report changes to terms and conditions between Securus and its end users, as well as changes to contract terms between Securus and its institutional customers. We decline to implement this change. The purpose of the condition imposed by the proposed decision is to capture any changes to terms and conditions that would impact end users, and the current condition as proposed accomplishes this. We do not find any basis to include changes to contract terms Securus has with its institutional customers.

Fourth, TURN proposes amending the proposed decision’s condition, or adding additional conditions, to better address their service quality and privacy concerns. We decline to implement these changes. The proposed decision did not find that the record supported that harms to service quality or privacy interests were likely to occur. Further, to the extent that the proposed transaction results in changes to Securus’ terms of service or privacy policies<sup>91</sup>, the current condition would already require reporting of these changes.

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<sup>91</sup> We note that the Joint Applicants agreed in their reply to TURN’s comments that Securus will construe the reporting condition to encompass changes to Securus’ privacy policies.

TURN argues that the proposed decision errs by admitting the Joint Applicants' April 23, 2026 "Notice to Update the Record" into the record, which states that Aventiv's current CEO, Mr. Abel has resigned and that Mr. Elder, Aventiv's current president, will assume the role of interim CEO. TURN argues that Rule 13.15 requires that the Joint Applicants' file a motion in order for the Commission to reopen the record. We correct the proposed decision to note that the update received on April 23, 2026 does not constitute a material change of fact contemplated by Rule 13.15 that necessitates re-opening the record. Mr. Elder's biographical information was provided in the application and remains unchanged. We modify the proposed decision to set the submission date to February 10, 2026 – the day reply briefs were filed.

TURN also disputes Mr. Elder's qualifications to be CEO, though they provide no discussion of why Mr. Elder is not qualified to be interim CEO. We find no basis to support this argument. TURN further argues that the proposed decision's determination of the technical qualifications of the prospective executives and board of directors is undermined by Mr. Abel's departure. As a result, TURN requests that the Commission strike finding of fact (FOF) 8. FOF 8 states, "Securus is expected to continue to be managed and operated by primarily the same officers and key personnel after the transfer." We disagree that this update undermines the proposed decision. FOF 8 remains unchanged by the update that Joint Applicants provided. The record reflects that the day-to-day management of Securus will continue to be undertaken by Aventiv's

executive board, of which Mr. Elder is current member.<sup>92</sup> The board of directors of the transferee will have no direct involvement with the day-to-day management of Securus.<sup>93</sup> We therefore decline to strike FOF 8 or make any further changes to the proposed decision.

### **17. Assignment of Proceeding**

Christine Harada is the assigned Commissioner, and Shannon Clark is the assigned ALJ and Presiding Officer in this proceeding.

### **Findings of Fact**

1. Securus was granted a CPCN to provide resold interexchange telecommunications services as a non-dominant interexchange carrier with the corporate identification number U-6888-C pursuant to D.04-05-049, under its prior name, Evercom Systems, Inc.
2. Securus notified the Commission of its name change via Advice Letter No. 3, effective October 21, 2010.
3. Platinum Equity, a Delaware limited partnership, is a private equity investment vehicle that currently holds an approximately 72.63% indirect controlling interest in Securus.
4. SCRS Intermediate HC is a holding company currently controlled by SCRS Holding Corporation, and ultimately, Platinum Equity.
5. Aventiv is Securus's parent company and provides technology and connectivity solutions for correctional facilities, law enforcement agencies, and incarcerated people.

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<sup>92</sup> Application at 11; Joint Applicants' Aug. 15, 2025 Response to Assigned ALJ's Ruling at 2.

<sup>93</sup> Joint Applicants' Aug. 15, 2025 Response to Assigned ALJ's Ruling at 2.

6. In this application, the Joint Applicants request authorization to transfer indirect control of Securus to SCRS Intermediate HC pursuant to Pub. Util. Code Section 854(a).

7. The proposed transaction is not expected to result in changes to Securus's rates, price lists, terms and conditions of service, or customer contracts.

8. Securus is expected to continue to be managed and operated by primarily the same officers and key personnel after the transfer.

9. The application proposes no new construction. There is no possibility that the proposed transaction will have a significant adverse impact on the environment.

10. The proposed transaction will significantly reduce the debt obligations of Securus's parent company, Aventiv, and will allow Securus to continue providing services to its users without interruption.

11. The application includes financial documentation demonstrating that SCRS Intermediate HC has a minimum of \$25,000 cash equivalent, reasonably liquid and readily available, as well as \$25,000 to cover all deposits required in order to provide resold interexchange services.

12. SCRS Intermediate HC supplied biographical information of its prospective board of directors that demonstrates sufficient expertise in telecommunications and related businesses.

13. Deutsche Bank, which holds approximately a 14.5% equity interest in SCRS Intermediate HC, has been the subject of, or involved with, regulatory actions, investigations, enforcement actions, and litigation.

14. Two prospective board members of SCRS Intermediate HC, Jorge Dominicus and Valerie Montgomery Rice, held positions within a company that filed for bankruptcy.

15. SCRS Intermediate HC cannot attest that no one associated with or employed by SCRS Intermediate HC as an affiliate, officer, director, partner, agent, or owner (directly or indirectly) of more than 10% of SCRS Intermediate Holding Corporation, or anyone acting in a management capacity for SCRS Intermediate Holding Corporation:

- a. held one of these positions with a company that filed for bankruptcy; (b) been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others;
- b. been convicted of a felony;
- c. been the subject of a criminal referral by a judge or public agency;
- d. had a telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction;
- e. personally entered into a settlement, or held one of these positions with a company that has entered into settlement of criminal or civil claims involving violations of Section 17000 *et seq.*, Section 17200 *et seq.*, or Section 17500 *et seq.* of the California Business & Professions Code, or of any other statute, regulation, or decisional law relating to fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others;
- f. been found to have violated any statute, law, or rule pertaining to public utilities or other regulated industries;  
or

- g. entered into any settlement agreements or made any voluntary payments or agreed to any other type of monetary forfeitures in resolution of any action by any regulatory body, agency, or attorney general.

16. SCRS Intermediate HC cannot attest that, to the best of SCRS Intermediate HC's knowledge, neither Volcano Vision, or any affiliate, officer, director, partner, nor owner of more than 10% of SCRS Intermediate HC, or any person acting in such capacity whether or not formally appointed, is being, or has been investigated by the FCC or any law enforcement or regulatory agency for failure to comply with any law, rule or order.

17. Users of IPCS overwhelmingly fall within ESJ communities.

18. The indirect transfer of control of Securus to SCRS Intermediate HC is consistent with the Commission's ESJ Action Plan.

19. The record supports that, with the imposition of the condition that Securus report any changes to its terms and conditions of service within two years of the effective date of the transfer, the transfer is in the public interest.

20. The Joint Applicants filed documents which have a presumption of confidentiality pursuant to D.24-11-003 and GO 66-D in Exhibits D and E to the application.

21. On August 15, 2025, and January 27, 2026, Joint Applicants filed motions for leave to file under seal confidential portions of their August 15, 2025, response to ALJ's request for supplemental information and their reply brief that allege that the filings contain competitively sensitive information about the proposed transaction and which were submitted consistent with the requirements of GO 66-D, Section 3.3 and Rule 11.

22. Requests for confidential treatment have been submitted for exhibits APP-1, TRN-01C, TRN-15C, TRN-3C, TRN-16C, TRN-17C, TRN-18C, TRN-20C, and TRN-28X-C and are supported by declarations setting forth the basis for confidentiality, and each document designates the portion of the information that is to be treated as confidential, consistent with the requirements set forth in GO 66-D. The exhibits contain financial information designated confidential by D.24-11-003; commercially sensitive, non-public information about the proposed transaction; or the Joint Applicants' business operations and/or strategies, which is the subject of non-disclosure agreements between the Joint Applicants and TURN.

### **Conclusions of Law**

1. The application meets the Commission's requirements for approval of a transfer of control and the indirect transfer of control of Securus to SCRS Intermediate HC should be approved subject to the condition that in the event that Securus makes any changes to its terms and conditions of service within two years of the effective date of this transfer, Securus shall submit a Tier 1 advice letter(s) with the Communications Division in accordance with General Order 96-B reporting any changes to its terms and conditions of service 30 days prior to the effective date of such changes.

2. SCRS Intermediate HC's financial documents provided in Exhibits D and E to the application should be given presumptive confidential treatment pursuant to D.24-11-003 for a period of three years without the need for a motion to seal the documents. If SCRS Intermediate HC believes that it is necessary for this information to remain under seal for longer than three years, SCRS Intermediate

HC should file a motion showing good cause for extending this order by no later than 30 days before the expiration of this order.

3. It is reasonable to grant Joint Applicants' August 15, 2025, and January 27, 2025, motions for leave to file under seal.

4. It is reasonable to grant the requests for confidential treatment of exhibits APP-1, TRN-01C, TRN-15C, TRN-3C, TRN-16C, TRN-17C, TRN-18C, TRN-20C, and TRN-28X-C.

5. All rulings made by the ALJ and assigned Commissioner in this proceeding should be affirmed.

6. All motions not ruled on should be denied.

7. A. 25-05-016 should be closed.

## **O R D E R**

### **IT IS ORDERED** that:

1. The indirect transfer of control of Securus Technologies, LLC to SCRS Intermediate Holding Corporation is approved pursuant to Public Utilities Code Section 854(a), subject to the condition set forth in this decision.

2. In the event that Securus Technologies, LLC's terms and conditions of service change within two years of the effective date of the transfer of control, Securus Technologies, LLC shall submit a Tier 1 advice letter(s) to the Communications Division in accordance with General Order 96-B. The Tier 1 advice letter(s) shall report any changes to its terms and conditions of service and shall be submitted 30 days prior to the effective date of such changes. The advice letter(s) shall describe any changes to the terms and conditions and provide 1) a

clean copy of the previous terms and conditions, 2) a clean copy of the new terms and conditions, and 3) a redline copy of the changes to the terms and conditions.

3. The proceeding is submitted as of April 23, 2026.

4. Exhibits D and E to the application are granted confidential treatment for a period of three years after the issuance date of this decision pursuant to Decision 24-11-003. During this three-year period, this information shall not be publicly disclosed except upon further Commission order or Administrative Law Judge ruling. If SCRS Intermediate Holding Corporation believes that it is necessary for this information to remain under seal for longer than three years, SCRS Intermediate Holding Corporation may file a motion showing good cause for extending this order by no later than 30 days before the expiration of this order.

5. The August 15, 2025, and January 27, 2025, motions of Platinum Equity Capital Partners, IV, L.P. and SCRS Intermediate Holding Company for leave to file under seal are granted.

6. Exhibits APP-1, TRN-01C, TRN-15C, TRN-3C, TRN-16C, TRN-17C, TRN-18C, TRN-20C, and TRN-28X-C are granted confidential treatment and shall not be publicly disclosed except on further Commission order or Administrative Law Judge ruling.

7. All rulings made by the Administrative Law Judge and assigned Commissioner in this proceeding are affirmed.

8. All motions not ruled on are denied.

9. Application 25-05-016 is closed.

This order is effective today.

Dated June \_\_\_, 2026, at Sacramento, California