



December 23, 2025

The Honorable Brendan Carr
Chairman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: General Support for Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities (GN Docket No. 13-111)

Dear Chairman Carr and Commissioners:

We, the undersigned State Attorneys General, write in support of FCC's proposal entitled "Support for Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities" (GN Docket No. 13-111).

The number of contraband cell phones recovered from state prisons is staggering and is a matter of grave concern for communities throughout the United States. Inmates use these contraband cell phones to conduct and coordinate violent crimes, including murder, child sexual exploitation, drug trafficking, kidnapping, aggravated battery of law enforcement officers, and other crimes such as money laundering, wire fraud, and identity theft. The scope of the problem and the direct threat to public safety cannot be overstated. There are many examples of criminal activity outside of prisons and jails being directed by inmates within those institutions with the use of contraband cell phones.

In Georgia, an inmate eligible for parole in 2023 used a contraband cell phone to solicit child sexual abuse material and to arrange a sexual encounter with an individual thought to be a minor. He was later sentenced to nearly 20 years in federal prison for online child solicitation.¹ In Alabama, prison inmates used contraband cell phones, social engineering techniques, and spoofing technology to trick retailers into transferring funds under fraudulent pretenses. The proceeds of

¹ <https://www.justice.gov/usao-sdfl/pr/man-prison-rape-sentenced-additional-235-months-federal-child-exploitation-crimes>

these telephone scams were then used to, among other things, finance the purchase of controlled substances and pay bribes to corrections officers.²

Arkansas similarly grapples with combatting contraband cell phones. The Arkansas Department of Corrections identified 230 gang leaders incarcerated in maximum security facilities who were caught and found guilty of multiple charges of possession of a cell phone in over 538 individual instances. These 230 inmates were from known threat groups including Bloods, Crips, Aryan Circle, and White Aryan Resistance, along with the largest group Gangster Disciples. Further investigations showed evidence of these leaders conducting illegal activities on the contraband cell phones, including drug trafficking, drone drops into the facilities, witness intimidation, and coordinating the movement of money and other gang activities throughout Arkansas and the United States. In 2022, Samuel Hartman coordinated his escape from a prison with the use of a contraband cell phone. Hartman was serving a life sentence for rape when he coordinated his escape with his wife and mother. He was arranged to be picked up by a vehicle reinforced with bulletproof materials, which drove him to a nearby boat ramp where he used jet skis to escape down the river. He was captured in 2023 in West Virginia.

In Idaho, prosecutors presented text messages exchanged from an inmate's cell phone where he plotted his escape during a hospital visit in Boise which resulted in the injury and shooting of three law enforcement officers.³ In Maryland, fifteen people have been indicted in three different prison contraband conspiracies. The investigation unveiled a sophisticated criminal network that employed drones, a correctional officer, and a hospital, allowing the distribution of dangerous drugs, including fentanyl, and a wide array of contraband such as cell phones, tools, and other illicit items.⁴

In South Carolina in 2020, 40 individuals associated with the Insane Gangster Disciples orchestrated a sprawling criminal enterprise from within prison. The activities included murder, kidnapping, firearms distribution, and international drug operations, all coordinated using contraband cell phones.⁵ Three years later, a separate South Carolina inmate was sentenced to 70 months in federal prison after pleading guilty to conspiracy to commit money laundering for his role in a scheme to extort and defraud military members using cell phones.⁶

In Tennessee, a federal indictment in 2021 charged 27 individuals with a various federal crimes relating to a large-scale conspiracy to distribute heroin, methamphetamine, fentanyl and cocaine. This criminal activity occurred inside the prison system and resulted in charges including kidnapping, money laundering, making threats by cell phone, and firearms violations.⁷

² <https://www.justice.gov/usao-ndal/pr/seven-indicted-role-prison-based-phone-scam-and-paying-bribes-corrections-officers>

³ <https://abcnews.go.com/US/boise-inmate-accomplice-ambush-hospital-captured/story?id=108362755>

⁴ <https://www.cbsnews.com/baltimore/news/fifteen-indicted-in-contraband-conspiracies-with-inmates-at-maryland-prison/>

⁵ <https://www.justice.gov/archives/opa/pr/40-charged-largest-federal-racketeering-conspiracy-south-carolina-history>

⁶ <https://www.justice.gov/usao-sc/pr/south-carolina-inmate-sentenced-federal-prison-role-military-sextortion-scheme-1>

⁷ <https://www.justice.gov/usao-mdtn/pr/reign-violence-and-drug-distribution-orchestrated-tennessee-prison-results-federal>

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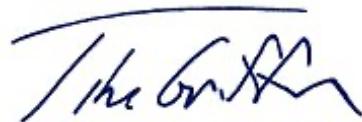
While we recognize that some have expressed concerns that jamming technology could potentially interfere with legitimate calls, including calls to emergency services, those concerns are unwarranted as most prisons have alternative methods to communicate with emergency services. Additionally, those concerns are outweighed by the present danger that contraband cell phones present to the American public. For example, we are aware of instances where contraband cell phones have been used to completely overwhelm 911 systems, endangering the public by impeding legitimate emergency calls from authorized communications. Around 2019, inmates at Macon State Prison learned they could defeat the prison's Wireless Containment System by dialing 911. By using contraband cell phones, these inmates were able to successfully overwhelm and shut down the entire 911 center, which is part of the largest 911 system in Georgia, encompassing 13 counties. This incident and ones like it further underscore the need for jamming technology.

We commend FCC for taking action to help address the critical threat to public safety caused by contraband cell phones. This is a major step in the right direction for keeping citizens and corrections personnel safe. We encourage you to adopt this rule which will undoubtedly serve to protect citizens across the United States.

Sincerely,



Christopher M. Carr
Georgia Attorney General



Tim Griffin
Arkansas Attorney General



Steve Marshall
Alabama Attorney General



Stephen J. Cox
Alaska Attorney General



James Uthmeier
Florida Attorney General



Brenna Bird
Iowa Attorney General

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Kris W. Kobach
Kansas Attorney General



Russell M. Coleman
Kentucky Attorney General



Liz Murrill
Louisiana Attorney General



Lynn Fitch
Mississippi Attorney General



Austin Knudsen
Montana Attorney General



Mike Hilgers
Nebraska Attorney General



Drew Wrigley
North Dakota Attorney General



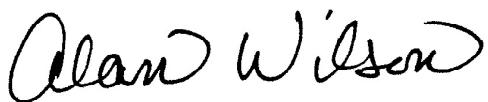
Dave Yost
Ohio Attorney General



Gentner Drummond
Oklahoma Attorney General



Dave Sunday
Pennsylvania Attorney General



Alan Wilson
South Carolina Attorney General



Marty J. Jackley
South Dakota Attorney General

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Jonathan Skrmetti
Tennessee Attorney General



Ken Paxton
Texas Attorney General



Derek Brown
Utah Attorney General



Jason Miyares
Virginia Attorney General



John B. McCuskey
West Virginia Attorney General