

# **EXHIBIT 19**

BEFORE THE  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

SANDY JUDD and TARA HERIVEL,

Complainants,

v.

AT&T COMMUNICATIONS OF THE  
PACIFIC NORTHWEST, INC., and T-NETIX,  
INC.,

Respondents.

Docket No. UT-042022

**SUPPLEMENTAL AFFIDAVIT OF  
NANCY LEE IN SUPPORT OF T-  
NETIX, INC.'S MOTION FOR  
SUMMARY DETERMINATION**

I, Nancy Lee, do hereby affirm the following:

1. I am the same Nancy Lee who submitted affidavits in this proceeding on April 21 and June 27, 2005.
2. I am making this affidavit to discuss the business consolidation of T-NETIX with a firm named Gateway Technologies, Inc. ("Gateway"). As stated in my April 21 Affidavit, I was employed by Gateway from 1990 until it merged with T-NETIX in 1999, and my last position there was Chief Financial Officer.
3. Gateway was a Texas corporation that provided services and equipment to correctional facilities throughout the nation, including in the State of Washington. Gateway was a leading competitor of T-NETIX. It was certified as an operator services provider ("OSP") in Washington. Gateway provided operator services to several correctional facilities in Washington.
4. Gateway was not affiliated with T-NETIX in any way prior to the merger. Gateway was not a party to the T-NETIX-AT&T contract or to any other contract to which T-NETIX was a party. Accordingly, Gateway did not serve the facilities that T-NETIX has served as AT&T's subcontractor. Specifically, it did not serve the McNeil Island, Monroe, or Clallam Bay facilities. It also did not serve Airway Heights.
5. The Gateway/T-NETIX merger was done as a stock acquisition whereby T-NETIX purchased 100% of Gateway's common stock, making Gateway a wholly owned subsidiary of T-NETIX. After the merger was consummated in June 1999, T-NETIX began contacting the utility commissions in each state where Gateway was certificated in order to request a name change to the certification, thus essentially transferring the

certification T-NETIX. Gateway remained a service provider in its own right under its certification pending these certificate transfers.

- 6. On January 9, 2001, T-NETIX requested that the Washington Utilities and Transportation Commission change the name on Gateway's certification to T-NETIX. The request was granted January 25, 2001.

I affirm, in accordance with the laws of perjury in the State of Texas, that the foregoing is true and correct.

*Nancy K. Lee*  
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 Nancy Lee

SUBSCRIBED AND SWORN TO BEFORE ME this 28<sup>th</sup> day of July, 2005.

*Cindy A. Perry*  
 \_\_\_\_\_  
 NOTARY PUBLIC

My Commission Expires: 9-7-2005

