

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AARON HERNANDEZ,

Plaintiff,

v.

SECURUS TECHNOLOGIES, INC.,

Defendant.

C.A. No. 16-12402-RGS

DECLARATION OF SHAHEEN MOHAMMADIPOUR

I, Shaheen Mohammadipour, under penalty of perjury and pursuant to 18 U.S.C. § 1621, hereby state and affirm that:

1. I am a Field Service Investigator for Securus Technologies, Inc. (“Securus”). Suffolk County Jail (Massachusetts) is the facility that I serve on behalf of Securus.
2. I am making this Declaration in support of the Securus Motion to Dismiss. I have personal knowledge of all facts herein and can testify to the same.
3. I have extensive experience with the logs Securus keeps of every time a recording of an inmate call is accessed. I researched the logs to find records of any time a recording of a call placed by Aaron Hernandez from Suffolk County Jail was accessed. I provided this information to Suffolk County in December 2016 when Suffolk County was required to produce documents in the criminal case against Mr. Hernandez.
4. On July 18, 2014, three successful attempts to access Aaron Hernandez call recordings were made. The user name for these attempts was “install@secur.tx”. These three calls are the ones at issue.

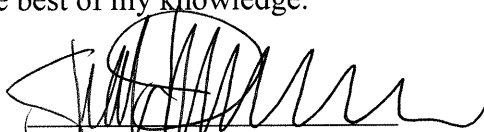
5. On January 9, 2017, at Securus' direction, I listened to the three recordings of Aaron Hernandez's calls that were accessed by "install@secur.tx". I had never listened to these call recordings prior to this instance.

6. I listened to all three recordings. Every call was placed to the same telephone number and based on the Securus Inmate phone system, the number belongs to Shayann Jenkins. The telephone number was not part of a list of numbers that Aaron Hernandez's lawyers requested to have added to the privileged call list maintained by the Suffolk County Sheriff's Department.

7. At the beginning of *all three calls*, I heard a clear verbal admonishment that the call will be monitored, and that if the inmate is intending to speak with an attorney he or she should hang up the phone immediately.

I affirm that the foregoing is true and correct to the best of my knowledge.

Dated: January 9, 2017



Shaheen Mohammadipour