

SECTION 2

INTRODUCTION AND STATEMENT OF PURPOSE

I, Saqvan Ali, submit this declaration and request for investigation for the purpose of preserving information, observations, and events that I personally witnessed during my employment with AT&T from January 2017 through March 2021.

This submission concerns my observations involving AT&T customer Hooman Asbaghi and the conduct that I personally witnessed while employed at the AT&T Del Mar Highlands / Del Mar Heights retail location.

The purpose of this submission is not to reach conclusions regarding matters beyond my personal knowledge. Rather, the purpose is to provide a truthful and accurate account of events that I directly observed, conversations that I personally heard, actions that I personally experienced, and concerns that developed through repeated observations over an extended period of time.

Throughout my employment, I became aware of what I believed to be unusual attention directed toward Mr. Asbaghi by management personnel and others within the organization. My concerns developed gradually as I observed recurring patterns involving the collection of information associated with Mr. Asbaghi, repeated discussions concerning his activities, repeated management involvement regarding his account matters, and conduct that appeared inconsistent with the treatment of ordinary customers.

As my concerns increased, I attempted to address those concerns through internal channels, including AT&T's ethics and hotline reporting systems. I made multiple reports because I believed the matters I was observing warranted review by individuals outside of the local management structure.

Over time, my continued efforts to raise concerns resulted in conflict with management personnel. I was instructed to stay away from matters involving Mr. Asbaghi, told to mind my own business, discouraged from assisting him directly, and ultimately received disciplinary action in the form of a final warning for alleged insubordination.

SECTION 1

EXECUTIVE SUMMARY

This submission is provided by Saqvan Ali, a resident of San Diego, California, and a former AT&T Customer Service Representative employed from January 2017 through March 2021 at the AT&T Del Mar Highlands / Del Mar Heights retail location.

The purpose of this submission is to preserve and document observations personally witnessed by the undersigned concerning AT&T customer Hooman Asbaghi during the course of the undersigned's employment.

During my employment, I observed conduct involving repeated collection of SIM card information associated with Mr. Asbaghi, repeated management attention directed toward his activities and telecommunications accounts, repeated discussions concerning him among management personnel, and conduct that caused me concern regarding access to customer information.

Over time, I became increasingly concerned regarding the treatment of Mr. Asbaghi and the manner in which information associated with his account appeared to be collected, discussed, and distributed within the organization. These concerns were based upon repeated observations occurring over an extended period of time rather than any single isolated event.

As my concerns increased, I reported those concerns through available AT&T ethics and hotline channels on numerous occasions. Based upon my recollection, I contacted AT&T's ethics and reporting channels approximately ten to fifteen times regarding matters involving Mr. Asbaghi and conduct that I believed warranted review.

Rather than receiving satisfactory explanations regarding the concerns I raised, I was instructed by management personnel to stay away from matters involving Mr. Asbaghi and to mind my own business. I was further discouraged from assisting Mr. Asbaghi directly despite my role as a customer service representative.

I ultimately received a final warning for alleged insubordination after repeatedly objecting to conduct that I believed was improper and after continuing to raise concerns regarding matters involving Mr. Asbaghi.

When I raised concerns regarding these activities, I was instructed by District Manager **Jesus Barraza** and store Managers to stay away from matters involving Mr. Asbaghi.

I was further instructed to allow management personnel to handle interactions involving him.

When I continued asking questions regarding what I was observing, I was told to mind my own business.

Following these conversations, I became increasingly reluctant to participate in activities involving the collection or transmission of information associated with Mr. Asbaghi.

2018

Throughout 2018, I had numerous interactions with Mr. Asbaghi as a customer.

During these interactions, Mr. Asbaghi repeatedly expressed concerns involving privacy, account access, electronic devices, telecommunications services, passwords, online accounts, and other related matters.

On numerous occasions, he presented information that he believed supported those concerns.

Although I do not recall every individual example due to the passage of time, these interactions occurred repeatedly and over an extended period.

The frequency of these concerns contributed significantly to my belief that the issues being raised deserved serious review.

2018 – Collection of SIM Information

Throughout this period, I continued observing what appeared to be a routine collection of SIM card information associated with Mr. Asbaghi.

Whenever new devices or services were purchased, information associated with those transactions was collected and provided to management personnel.

upon my personal observations, experiences, conversations, and events that I personally witnessed during my employment.

Primary Subject

Hooman Asbaghi

Mr. Asbaghi was an AT&T customer who regularly visited the Del Mar location during the period relevant to this submission. Through repeated interactions with Mr. Asbaghi and observations made during my employment, I became aware of numerous concerns involving his accounts, telecommunications services, devices, and privacy-related complaints.

Respondent

AT&T

AT&T is identified as the primary respondent because the events described in this submission occurred during the course of my employment with AT&T and involve conduct, actions, communications, and account-related activities that occurred within the organization.

Individuals Referenced Within This Submission

John Goodrich

Former Store Manager at the Del Mar location. Mr. Goodrich participated in discussions regarding Mr. Asbaghi and made statements concerning Mr. Asbaghi that are described in this submission.

Jesus Barraza

District Manager. Mr. Barraza was involved in management decisions relating to matters discussed in this submission. Mr. Barraza instructed me to stay away from matters involving Mr. Asbaghi and to allow management personnel to handle interactions involving him.

Brian Brown

This pattern occurred repeatedly and became one of the primary reasons I became concerned regarding the treatment of Mr. Asbaghi.

2018 – Account Access Concerns

During my employment, I personally observed individuals access information associated with Mr. Asbaghi's accounts when he was not present and when there appeared to be no legitimate customer-service reason for doing so.

I also observed circumstances in which individuals appeared to possess detailed knowledge regarding Mr. Asbaghi's personal information and account-related matters.

These observations caused me concern regarding how information associated with Mr. Asbaghi was being accessed, discussed, and distributed.

My concerns were based upon repeated observations rather than any single isolated incident.

2018 – Statement by John Goodrich

One of the most memorable conversations I experienced during my employment involved former Store Manager John Goodrich.

During a discussion regarding Mr. Asbaghi, Mr. Goodrich stated words substantially similar to:

"Hooman's not crazy. These crazy ass people track him all day. I wonder why."

This statement remained memorable because it directly contradicted the way Mr. Asbaghi was often characterized by others.

The statement reinforced concerns I had already developed through my own observations.

2018 – Ethics and Hotline Reporting

As my concerns continued to increase, I contacted AT&T's ethics and hotline reporting channels on multiple occasions.

This declaration is being submitted so that the information contained herein may be preserved and reviewed by any appropriate authority, investigator, attorney, regulatory agency, or other authorized party. It is my hope that the information I provide will assist in determining whether further investigation, review, or preservation of records is appropriate.

All statements contained in this submission are made to the best of my knowledge, recollection, and belief and are based upon events that I personally witnessed or experienced during my employment.

This submission is not intended to speculate regarding matters outside my personal knowledge. Rather, it is intended to preserve events that I personally witnessed, conversations that I personally heard, actions that I personally experienced, and concerns that developed through direct observation during my employment with AT&T.

The information contained within this submission is provided so that any reviewing authority, investigator, attorney, regulatory body, or other authorized party may evaluate the events described herein and determine whether further review or investigation is warranted.

SECTION 3

PARTIES AND INDIVIDUALS INVOLVED

Witness / Declarant

Saqvan Ali

I am a resident of San Diego, California. I was employed by AT&T Mobility from January 2017 through March 2021 as a Customer Service Representative at the AT&T Del Mar Highlands / Del Mar Heights retail location.

My responsibilities included assisting customers with account management, device activations, SIM card replacements, billing inquiries, upgrades, troubleshooting, and customer support. The information contained within this submission is based

Another individual known to me as **Kameron** was present and personally heard the conversation.

2019 Through March 2021

The concerns described in this submission continued to remain with me throughout the remainder of my employment.

Although I attempted to focus on my responsibilities, the events I had witnessed and the lack of satisfactory explanations continued to affect my confidence in the organization.

March 2021

I voluntarily ended my employment with AT&T.

At the time of my departure, many of the concerns described in this submission remained unresolved.

March 2024

In approximately March 2024, after my employment with AT&T had ended, I encountered **Kathy Amir Teymour**.

During our conversation, Ms. Teymour referenced Mr. Asbaghi being outside of the country.

This statement stood out to me because I was unaware of any reasonable explanation for how she would possess that information.

The conversation caused me to reflect upon concerns I had previously developed during my employment and reinforced my belief that the events described within this submission warranted preservation and review.

SECTION 5

FULL WITNESS TESTIMONY AND DETAILED OBSERVATIONS

An individual whose name was referenced in connection with matters involving Mr. Asbaghi.

Rodney Crooks

An individual whose name was referenced in connection with matters involving Mr. Asbaghi.

Kameron

An additional witness who was present during the incident involving Mr. Asbaghi's sister and who personally heard statements made during that encounter.

Additional Individuals

There may be additional individuals whose identities I no longer recall due to the passage of time. Should further information become available, I reserve the right to supplement this submission with additional names, information, or supporting testimony.

SECTION 4

DETAILED CHRONOLOGY OF EVENTS

January 2017

I began my employment with AT&T as a Customer Service Representative at the AT&T Del Mar Highlands / Del Mar Heights retail location in San Diego County, California.

My duties included assisting customers with wireless accounts, billing concerns, upgrades, device activations, SIM card replacements, troubleshooting, and general customer support.

2017

District-level management personnel whose names were repeatedly associated with matters involving Mr. Asbaghi during my employment.

Stephen Eisermann

Management personnel referenced in connection with discussions and activities involving Mr. Asbaghi.

Kathy Amir Teymour

AT&T employee with whom I had a conversation in approximately March 2024 concerning Mr. Asbaghi.

Larry Lendre

An individual whose name was referenced in connection with matters involving Mr. Asbaghi.

Mark Baum

An individual whose name was referenced in connection with matters involving Mr. Asbaghi.

Mark Rosen

An individual whose name was referenced in connection with matters involving Mr. Asbaghi.

Ashley Kieth

An individual whose name was referenced in connection with matters involving Mr. Asbaghi.

Neil Nydegger

An individual whose name was referenced in connection with matters involving Mr. Asbaghi.

Emma Crooks

During the course of my employment, I became aware that AT&T customer Hooman Asbaghi was frequently discussed among management personnel and employees at the Del Mar location.

Mr. Asbaghi's name was known by numerous individuals within the organization and appeared to receive a level of attention that I did not observe with ordinary customers.

At the time, I did not fully understand the significance of these discussions. However, as time progressed, I began to recognize recurring patterns involving Mr. Asbaghi and matters associated with his accounts and telecommunications services.

2017 Through Early 2018

As my employment continued, I observed repeated collection of information associated with Mr. Asbaghi whenever he purchased devices, SIM cards, hotspots, or other telecommunications products and services.

Whenever Mr. Asbaghi conducted transactions involving new equipment or services, information associated with those transactions was frequently requested by management personnel.

Over time, I became concerned because the repeated collection and transmission of information associated with a single customer appeared unusual compared to the treatment of other customers.

I also became aware of repeated conversations involving Mr. Asbaghi among management personnel and employees.

Early 2018

By early 2018, my concerns had increased substantially.

I began questioning why so much attention was being directed toward Mr. Asbaghi and why information associated with his accounts and purchases appeared to be routinely collected and discussed.

Background and Basis of Testimony

I, **Saqvan Ali**, provide the following testimony based upon my firsthand observations, experiences, conversations, and events that I personally witnessed during my employment with AT&T from January 2017 through March 2021.

The statements contained within this section are based upon my direct knowledge unless otherwise indicated. Any opinions expressed are based upon observations I personally made during the course of my employment.

My purpose in providing this testimony is to preserve an accurate record of events that I witnessed and to assist any reviewing authority in understanding the concerns that developed during my employment.

Introduction to Hooman Asbaghi

During my employment at AT&T, I became acquainted with customer Hooman Asbaghi.

Unlike ordinary customers who visited the store occasionally, Mr. Asbaghi became a frequent topic of discussion among management personnel and employees.

Over time, I became aware that his name was widely recognized within the organization and that an unusual amount of attention was directed toward matters involving him.

As I continued interacting with Mr. Asbaghi and observing events surrounding him, I began developing concerns regarding how he was being treated and how information associated with him appeared to be handled.

Repeated Collection of SIM Information

One of the earliest concerns I developed involved the repeated collection of SIM card information associated with Mr. Asbaghi.

Whenever Mr. Asbaghi purchased a device, obtained a SIM card, activated service, upgraded equipment, or conducted related transactions, information associated with those transactions was routinely requested and collected by management personnel.

Background and Basis of Testimony

I, **Saqvan Ali**, provide the following testimony based upon my firsthand observations, experiences, conversations, and events that I personally witnessed during my employment with AT&T from January 2017 through March 2021.

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Introduction to Hooman Asbaghi

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Unlike ordinary customers who visited the store occasionally, Mr. Asbaghi became a frequent topic of discussion among management personnel and employees.

Over time, I became aware that his name was widely recognized within the organization and that an unusual amount of attention was directed toward matters involving him.

As I continued interacting with Mr. Asbaghi and observing events surrounding him, I began developing concerns regarding how he was being treated and how information associated with him appeared to be handled.

Repeated Collection of SIM Information

One of the earliest concerns I developed involved the repeated collection of SIM card information associated with Mr. Asbaghi.

Whenever Mr. Asbaghi purchased a device, obtained a SIM card, activated service, upgraded equipment, or conducted related transactions, information associated with those transactions was routinely requested and collected by management personnel.

Based upon my recollection, I submitted approximately ten to fifteen reports regarding matters involving Mr. Asbaghi and conduct that I believed warranted review.

My purpose in making these reports was to ensure that concerns I had personally observed would be reviewed by individuals outside of the local management structure.

I do not currently possess copies of those reports because any associated records were maintained on company-issued equipment that was returned upon separation from employment.

Late 2018

After repeatedly raising concerns regarding matters involving Mr. Asbaghi and objecting to conduct that I believed was improper, I received a final warning for alleged insubordination.

At the time, I believed the disciplinary action was connected to my refusal to remain silent regarding concerns I had repeatedly raised.

The disciplinary action had a significant impact on my morale, confidence, and future aspirations within the company.

Early 2019

In early 2019, I personally witnessed an incident involving Mr. Asbaghi's sister, "Ommid" at the Del Mar location.

She entered the store in a visibly emotional and distressed state and discussed information associated with Mr. Asbaghi's electronic accounts.

During the conversation, she indicated that she possessed extensive information associated with Mr. Asbaghi on her phone, including information relating to passwords, messages, photographs, iCloud-related information, and other electronic account data.

She expressed concern regarding Mr. Asbaghi becoming aware of that information.

The conversation was highly unusual and memorable.

This pattern occurred repeatedly.

Over time, I began noticing that information associated with Mr. Asbaghi appeared to receive far greater attention than information associated with ordinary customers.

Because of the frequency with which this occurred, I began questioning the purpose behind the collection and distribution of that information.

At the time, I was unable to obtain satisfactory explanations regarding why so much information associated with a single customer was repeatedly being gathered and discussed.

Management Interest in Hooman Asbaghi

As my employment continued, I observed repeated discussions involving Mr. Asbaghi among management personnel.

His name was mentioned frequently.

His activities, purchases, visits to the store, account matters, and personal circumstances were discussed far more often than those of ordinary customers.

The amount of attention directed toward him became increasingly difficult to ignore.

Based upon my observations, management personnel appeared unusually interested in matters involving Mr. Asbaghi.

Although I did not initially understand the significance of these discussions, the pattern became increasingly apparent over time.

Observations Regarding Account Access

One of my most significant concerns involved observations relating to access to information associated with Mr. Asbaghi.

During my employment, I personally observed individuals access information associated with Mr. Asbaghi's accounts when he was not present and when there appeared to be no legitimate customer-service purpose for doing so.

During a discussion concerning Mr. Asbaghi, Mr. Goodrich stated words substantially similar to:

"Hooman's not crazy. These crazy ass people track him all day. I wonder why."

I distinctly remember this statement because it contradicted the way Mr. Asbaghi was frequently described by others.

The statement suggested that concerns surrounding Mr. Asbaghi were known and discussed among individuals within the organization.

The statement reinforced concerns I had already developed through my own observations.

Corporate Reporting Efforts

As my concerns continued to grow, I sought review through AT&T ethics and hotline reporting channels.

Based upon my recollection, I submitted approximately ten to fifteen reports involving concerns associated with Mr. Asbaghi and conduct I believed warranted review.

My objective was not to create conflict.

My objective was to ensure that concerns I had personally observed would be reviewed by individuals outside of the local management structure.

I believed internal review was necessary because the concerns involved management personnel and activities occurring within the workplace.

Despite these efforts, I never received explanations that satisfactorily addressed the concerns I had raised.

Disciplinary Action

Following my repeated objections and continued questions regarding matters involving Mr. Asbaghi, I was subjected to disciplinary action.

I ultimately received a final warning for alleged insubordination.

I also observed situations in which individuals appeared to possess detailed knowledge regarding information associated with Mr. Asbaghi.

These observations caused me concern because they appeared inconsistent with ordinary customer-service activities.

My concerns developed gradually through repeated observations rather than a single isolated incident.

Over time, I became increasingly uncomfortable with what I was witnessing.

Attempts to Question What Was Occurring

As my concerns increased, I began asking questions regarding why so much attention was being directed toward Mr. Asbaghi.

I questioned why information associated with his accounts was repeatedly collected and discussed.

I questioned why management personnel appeared so interested in matters involving him.

I questioned why individuals appeared to possess knowledge regarding information associated with him.

Rather than receiving satisfactory explanations, I was instructed to stay away from matters involving Mr. Asbaghi.

I was told to allow management personnel to handle interactions involving him.

When I continued asking questions, I was told to mind my own business.

These responses increased my concern because they discouraged further inquiry rather than providing explanations.

Statement by John Goodrich

One conversation that remains particularly memorable involved former Store Manager John Goodrich.

Status:
Available.

Exhibit B

Witness Declaration and Request for Investigation

Date:
Current Submission

Description:
Expanded witness declaration prepared by Saqvan Ali containing a detailed chronology, observations, supporting information, and a request for review.

Relevance:
Primary declaration submitted in support of this matter.

Status:
Available.

Exhibit C

AT&T Ethics and Hotline Reports

Date:
Approximately 2018 through 2019

Description:
Reports submitted by Saqvan Ali through AT&T's ethics hotline, and internal reporting channels concerning concerns involving Hooman Asbaghi and related conduct.

Relevance:
May establish that concerns were reported internally and may identify dates, individuals, investigative actions, and company responses.

Status:
Not currently in possession of the undersigned. Believed to be maintained within AT&T records if preserved.

I have attempted to provide an accurate account based upon my recollection and personal observations.

To the best of my knowledge and belief, the information contained within this testimony is true and correct.

SECTION 6

EVIDENCE INDEX AND SUPPORTING MATERIALS

Purpose of Evidence Index

This Evidence Index is intended to identify documents, witnesses, records, and materials that may support, corroborate, explain, or otherwise relate to the observations described within this submission.

Certain records may currently be unavailable to the undersigned due to the passage of time, separation from employment, or lack of access to company-controlled systems. Nevertheless, those records are identified below because they may still exist and may be obtainable through appropriate investigative, regulatory, legal, or administrative processes.

Exhibit A

Original Witness Statement of Saqvan Ali

Date:

March 26, 2024

Description:

Written statement prepared by Saqvan Ali describing observations involving Hooman Asbaghi and events witnessed during employment at AT&T.

Relevance:

Provides a contemporaneous summary of concerns and observations made prior to preparation of this expanded submission.

Although I voluntarily left AT&T in March 2021, the events described in this submission remained with me.

The concerns I developed did not disappear simply because my employment ended.

In approximately March 2024, I encountered Kathy Amir Teymour.

During our conversation, she referenced Mr. Asbaghi being outside of the country.

The statement stood out to me because I was unaware of any reasonable explanation for how she would possess that information.

The encounter caused me to revisit concerns that had developed during my employment and reinforced my belief that the events I had witnessed should be documented and preserved.

Impact on Me Personally and Professionally

The events described in this testimony had a substantial impact on me.

Professionally, I became distracted and increasingly uncomfortable in my work environment.

My confidence in the organization was affected by concerns that I believed were not being properly addressed.

Personally, I experienced significant frustration and emotional distress as a result of witnessing conduct that concerned me while feeling unable to obtain meaningful answers regarding what I was observing.

The combination of repeated concerns, disciplinary action, and the lack of satisfactory explanations ultimately contributed to my decision to leave AT&T and pursue opportunities elsewhere.

Conclusion

I provide this testimony voluntarily and for the purpose of preserving information that I believe may be relevant to any future review, investigation, or proceeding.

At the time, I believed the disciplinary action was connected to my refusal to stop raising concerns and my unwillingness to simply ignore what I was observing.

The disciplinary action had a significant effect on me professionally.

Prior to these events, I had ambitions of advancing within AT&T into higher levels of leadership and management.

The events described in this submission negatively affected those aspirations and contributed to my decision to eventually leave the company.

Incident Involving Hooman Asbaghi's Sister

One of the most unusual events I witnessed occurred in approximately early 2019.

Mr. Asbaghi's sister entered the Del Mar location in a visibly emotional and distressed condition.

During the conversation that followed, she discussed information associated with Mr. Asbaghi's electronic accounts and devices.

She indicated that she possessed extensive information associated with Mr. Asbaghi on her phone.

The information she referenced included passwords, messages, photographs, iCloud-related information, and other electronic account data.

She expressed concern regarding Mr. Asbaghi becoming aware of that information.

The conversation was highly unusual and memorable.

Another individual known to me as Kameron was present and personally heard the statements that were made.

Because of concerns that had already developed through my observations involving Mr. Asbaghi, this incident had a significant impact on me and reinforced concerns I had already formed.

Continuing Impact After Leaving AT&T

Exhibit D

Employment Records

Date:

January 2017 through March 2021

Description:

Personnel records relating to Saqvan Ali, including employment history, evaluations, disciplinary actions, final warning documentation, and related records.

Relevance:

May corroborate disciplinary action, reporting activity, management interactions, and employment history.

Status:

Believed to be maintained by AT&T.

Exhibit E

Witness Testimony of Kameron

Date:

To Be Obtained

Description:

Potential witness testimony from Kameron regarding the incident involving Hooman Asbaghi's sister and statements made during that encounter.

Relevance:

Potential corroboration of events described in this submission.

Status:

Not currently obtained.

Exhibit F

Witness Testimony of Hooman Asbaghi

Exhibit D

Employment Records

Date:

January 2017 through March 2021

Description:

Personnel records relating to Saqvan Ali, including employment history, evaluations, disciplinary actions, final warning documentation, and related records.

Relevance:

May corroborate disciplinary action, reporting activity, management interactions, and employment history.

Status:

Believed to be maintained by AT&T.

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Date:

To Be Obtained

Description:

Potential witness testimony from Kameron regarding the incident involving Hooman Asbaghi's sister and statements made during that encounter.

Relevance:

Potential corroboration of events described in this submission.

Status:

Not currently obtained.

Exhibit F

Witness Testimony of Hooman Asbaghi

- Customer transaction records.
- Device purchase records.
- SIM replacement records.
- Management communications.
- Personnel records.
- Investigative records.
- Witness statements.

Preservation of any remaining records may assist in ensuring that relevant information is not lost.

Conclusion

The concerns identified within this section are presented solely for purposes of review and investigation.

I am not requesting that any conclusions be reached based solely upon my testimony. Rather, I respectfully request that qualified individuals review the available evidence, records, witnesses, and circumstances described throughout this submission and determine whether further investigation is warranted.

SECTION 8

REQUESTED REVIEW, INVESTIGATION, AND PRESERVATION OF RECORDS

Purpose of Request

The purpose of this submission is not to request that any predetermined conclusion be reached. Rather, it is to request that the information contained within this declaration be reviewed and that any available records relating to the matters described herein be preserved and examined by the appropriate authority.

Based upon the observations described throughout this submission, I respectfully request that the receiving authority determine whether further inquiry or investigation is warranted.

Requested Review

I respectfully request a review of the following matters:

1. The repeated collection of information associated with Hooman Asbaghi, including information relating to devices, SIM cards, telecommunications services, account activity, and related transactions.
2. The circumstances surrounding management involvement in matters relating to Hooman Asbaghi.
3. The repeated discussions and activities involving Hooman Asbaghi were observed during the relevant time period.
4. The circumstances surrounding concerns regarding access to information associated with Hooman Asbaghi's accounts.
5. The handling of concerns reported through AT&T's ethics and hotline channels.
6. The circumstances surrounding disciplinary action taken against the undersigned arose after concerns were repeatedly raised.

Requested Investigation

If deemed appropriate, I respectfully request that investigators review and evaluate:

- Customer account records.
- Account-access logs.
- Customer account notes.
- SIM replacement history.
- Device purchase history.
- Internal communications.
- Ethics and hotline reports.
- Personnel records.
- Management communications.
- Any investigative records generated during the relevant time period.

Date:
To Be Obtained

Description:
Potential witness declaration from Hooman Asbaghi concerning matters discussed within this submission.

Relevance:
May provide direct information concerning events, concerns, account activity, and experiences referenced throughout this filing.

Status:
Not currently attached.

Exhibit G

Customer Account Records

Date:
Relevant Time Period

Description:
Customer account records, account-access logs, account notes, transaction history, SIM replacement history, device purchases, service changes, and related telecommunications records associated with Hooman Asbaghi.

Relevance:
May corroborate transaction activity, account access, service history, and timeline events described in this submission.

Status:
Not currently available to the undersigned.

Exhibit H

Store Surveillance and Security Records

Date:
Relevant Time Period

Throughout the relevant time period, information associated with SIM cards, devices, telecommunications services, and related transactions involving Mr. Asbaghi appeared to receive unusual attention from management personnel.

The frequency with which this information was requested, collected, and discussed caused concern because it appeared different from the manner in which ordinary customer information was handled.

Accordingly, a review of records associated with the collection, use, and dissemination of information relating to Mr. Asbaghi may be appropriate.

Concern 2 – Access to Customer Account Information

A second area of concern involves observations relating to access to information associated with Mr. Asbaghi's accounts.

During my employment, I observed circumstances in which information associated with Mr. Asbaghi appeared to be accessed, reviewed, or discussed despite there being no apparent customer-service purpose for doing so.

I also observed circumstances in which individuals appeared to possess detailed knowledge regarding matters associated with Mr. Asbaghi.

Because customer privacy and account security are fundamental responsibilities within the telecommunications industry, review of account-access records, audit logs, account notes, and related records may assist in determining whether account activity was appropriate and authorized.

Concern 3 – Internal Reporting and Ethics Complaints

A third area of concern involves internal reporting.

Based upon my recollection, I submitted approximately ten to fifteen reports through AT&T ethics and hotline channels concerning matters involving Mr. Asbaghi and conduct that I believed warranted review.

The existence, handling, investigation, and disposition of those reports may be relevant to understanding whether concerns raised internally were appropriately reviewed.

Description:

Potential surveillance footage, security recordings, and related records from the AT&T Del Mar Highlands / Del Mar Heights location.

Relevance:

May corroborate customer visits, employee interactions, witness presence, and specific incidents described in this submission.

Status:

Unknown.

Exhibit I

Management Communications

Date:

Relevant Time Period

Description:

Internal communications, emails, messages, directives, notes, or records involving management personnel identified within this submission.

Relevance:

May corroborate discussions, instructions, decisions, and actions involving matters referenced herein.

Status:

Not currently available to the undersigned.

Exhibit J

Additional Supporting Materials

Date:

Various

Description:

Any future documents, records, witness statements, screenshots, correspondence, account information, or supporting materials obtained after submission of this declaration.

Accordingly, preservation and review of any ethics reports, hotline records, investigative notes, or related materials may be appropriate.

Concern 4 – Management Conduct

The actions and instructions of management personnel may also warrant review.

When concerns were raised regarding matters involving Mr. Asbaghi, I was instructed to stay away from him, allow management personnel to handle matters involving him, and mind my own business.

The reasons for these instructions and the circumstances surrounding them may assist in understanding the events described within this submission.

Concern 5 – Employee Retaliation Concerns

Another area warranting review involves the disciplinary action I received after repeatedly raising concerns.

I ultimately received a final warning for alleged insubordination.

Although I cannot determine the motivation behind that disciplinary action, the timing and circumstances surrounding it caused me concern.

Review of employment records, disciplinary records, performance records, management communications, and related materials may assist in determining whether there was any connection between concerns I raised and the disciplinary action that followed.

Concern 6 – Preservation of Historical Records

Given the age of the events described within this submission, preservation of any remaining records may be important.

Potentially relevant materials may include:

- Ethics and hotline records.
- Employee communications.
- Account-access logs.
- Account notes.

I further request that any individuals with direct knowledge of the events described within this submission be identified and interviewed if appropriate.

Potential Witnesses for Review

Potential witnesses may include, but are not necessarily limited to:

- Hooman Asbaghi.
- Kameron.
- John Goodrich.
- Jesus Barraza.
- Brian Brown.
- Stephen Eisermann.
- Kathy Amir Teymour.
- Other employees, supervisors, managers, or individuals who may possess relevant knowledge.

Request for Preservation of Records

Because many of the events described in this submission occurred several years ago, preservation of any remaining records may be critically important.

Accordingly, I respectfully request that any available records potentially relating to the matters described herein be preserved to the extent permitted by law and policy.

Such records may include:

- Account-access logs.
- Customer account notes.
- Ethics and hotline reports.
- Internal communications.
- Personnel records.
- Management communications.
- Customer transaction records.
- Device purchase records.
- SIM card records.
- Investigative files.

Professional Impact

- Surveillance records.
- Electronic records and databases.

Purpose of Preservation Request

The purpose of this request is to ensure that potentially relevant information remains available should further review, investigation, administrative proceedings, legal proceedings, or witness interviews become necessary.

Good Faith Statement

This submission is made in good faith.

The information contained herein is provided for review and investigation based upon my personal observations and experiences.

I respectfully request only that the matters described throughout this submission be evaluated fairly, objectively, and based upon the available evidence and records.

Conclusion

I respectfully request that the receiving authority review the information presented within this submission, determine whether additional inquiry is warranted, preserve any relevant records that remain available, and take any actions deemed appropriate based upon the evidence obtained through such review.

SECTION 9

IMPACT STATEMENT

Purpose of This Statement

The purpose of this section is to explain the personal and professional impact that the events described throughout this submission had upon me and to explain why I believe it is important that my observations be preserved and reviewed.

Professional Impact

Relevance:

May provide additional corroboration or clarification of matters described in this filing.

Status:

Reserved for future supplementation.

Reservation of Rights

The undersigned reserves the right to supplement this Evidence Index with additional exhibits, witness statements, documents, records, correspondence, or other supporting materials that become available after the date of submission.

Nothing contained within this Evidence Index should be interpreted as limiting the scope of evidence that may later be submitted in connection with this matter.

SECTION 7

REGULATORY CONCERNS AND MATTERS WARRANTING REVIEW

Purpose of This Section

The purpose of this section is not to make final conclusions regarding liability, wrongdoing, or violations of law. Rather, the purpose is to identify matters personally observed by the undersigned that may warrant review, investigation, preservation of records, or further inquiry by an appropriate authority.

The concerns described below are based upon observations made during the course of employment at AT&T and are presented so that qualified investigators, regulators, attorneys, or other authorized parties may determine whether further review is appropriate.

Concern 1 – Repeated Collection of Customer Information

One of the primary concerns identified in this submission involves the repeated collection of information associated with customer Hooman Asbaghi.

The situation remained with me long after the events occurred and continued to affect me even after my employment ended.

Impact on Personal Integrity

One of the most difficult aspects of the events described within this submission was the conflict between my responsibilities as an employee and my personal belief that concerns should be reported when something appears improper.

I believed it was my responsibility to raise concerns when I observed conduct that appeared unusual or inconsistent with normal practices.

The fact that concerns were repeatedly raised through internal channels yet remained unresolved left me feeling that I had not fulfilled my obligation to ensure those concerns were properly reviewed.

This submission is, in part, an effort to preserve those observations so that they are not lost due to the passage of time.

Reason for Coming Forward

I am providing this testimony because I believe the events I observed should be documented and preserved.

I do not submit this declaration for personal gain, revenge, retaliation, or any improper purpose.

My objective is simply to provide a truthful account of events that I personally witnessed and to ensure that those observations are available for review by any authority, investigator, attorney, regulator, or other party with a legitimate interest in the matters described herein.

I believe that preserving accurate witness testimony is important regardless of the conclusions ultimately reached by any reviewing authority.

Continuing Concern

Even years after leaving AT&T, certain events continued to stand out in my memory.

At the time the events described within this submission occurred, I was employed by AT&T and had aspirations of advancing within the organization into leadership and management positions.

As my concerns regarding matters involving Hooman Asbaghi increased, I found it increasingly difficult to focus solely on my job responsibilities. The repeated situations I observed, combined with the lack of satisfactory explanations when concerns were raised, created ongoing professional stress.

Rather than feeling supported when attempting to raise concerns through internal channels, I felt discouraged from asking questions and discouraged from pursuing matters that I believed warranted review.

When I was instructed to stay away from matters involving Hooman Asbaghi and was later disciplined for alleged insubordination, I became increasingly concerned about my future within the organization.

The disciplinary action negatively affected my morale, confidence, and belief that concerns could be raised without adverse consequences.

Over time, these circumstances contributed to my decision to leave AT&T and pursue employment opportunities elsewhere.

Emotional Impact

The events described in this submission also had a significant emotional impact on me.

I experienced ongoing frustration because I repeatedly observed conduct that concerned me while feeling unable to obtain meaningful answers regarding what I was witnessing.

The repeated concerns, the lack of satisfactory explanations, and the disciplinary action that followed created a sense of helplessness and uncertainty.

I often questioned whether concerns I was raising were being taken seriously and whether appropriate individuals were reviewing the issues being reported.

The conversation involving Kathy Amir Teymour in approximately March 2024 caused me to revisit concerns that had originated during my employment and reinforced my belief that the matters described within this submission should be formally documented.

For that reason, I have prepared this submission to ensure that my observations, experiences, and concerns are preserved in a complete and organized manner.

Conclusion

The impact of these events extended beyond my employment and affected me both professionally and personally.

While I cannot determine what conclusions should ultimately be drawn by investigators or reviewing authorities, I believe the events described within this submission warrant preservation, review, and fair consideration.

It is for that reason that I have chosen to provide this statement and place my observations on the record.

SECTION 10

DECLARATION UNDER PENALTY OF PERJURY, CERTIFICATION, SIGNATURE PAGE, AND NOTARY ACKNOWLEDGMENT

CERTIFICATION OF DECLARANT

I, Saqvan Ali, hereby certify that I have reviewed the contents of this submission and that the statements contained herein are true and correct to the best of my knowledge, recollection, and belief.

I further certify that this submission is based upon my personal observations, experiences, conversations that I personally heard, events that I personally witnessed, and information known to me during the course of my employment with AT&T.

Where statements are based upon recollection, they are provided honestly and in good faith based upon my memory of events occurring during the relevant time period.

Where opinions are expressed, those opinions are based upon observations that I personally made and experiences that I personally encountered.

GOOD FAITH DECLARATION

This submission is made voluntarily and in good faith.

I am not submitting this declaration for purposes of harassment, retaliation, personal gain, or any improper purpose.

My purpose is to preserve information that I personally witnessed and to ensure that those observations are available for review by any appropriate authority, investigator, attorney, regulator, or other authorized party.

I respectfully request that the information contained within this submission be evaluated fairly, objectively, and based upon the available evidence.

DECLARATION UNDER PENALTY OF PERJURY

I, Saqvan Ali, declare under penalty of perjury under the laws of the State of California that the foregoing statements contained within this submission are true and correct to the best of my knowledge, recollection, and belief.

I understand that this declaration may be submitted to regulatory agencies, investigators, attorneys, courts, administrative bodies, or other authorized entities and that it is intended to serve as a truthful account of events that I personally witnessed.

I make this declaration freely, voluntarily, and without coercion.

Executed on: 6-19-26

At: San Diego, California

DECLARANT

Saqvan Ali

Date:

6-19-26

NOTARY ACKNOWLEDGMENT

State of California

County of San Diego

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

On June 19, 2026 before me,
Savannah Stackhouse, Notary Public, personally appeared
Saqvan Ali, who proved to me on the basis of satisfactory evidence to be the
person whose name is subscribed to this instrument and acknowledged to me that
he executed the same in his authorized capacity and that by his signature on the
instrument the person executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California
that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Notary Public

(SEAL)



END OF SUBMISSION