ABE WARANOWITZ AFFIDAVIT

I, Abraham Waranowitz, hereby affirm that the following is true and accurate to the best of my recollection:

- 1. I was a Radio Frequency (RF) Engineer, and I formerly worked for AT&T Wireless in the Baltimore-Washington area. I began working as an RF Engineer at AT&T Wireless in 1995 in Paramus NJ.
- 2. I was the State's expert witness with regard to cell tower technology in *State v. Adnan Syed*, Case Nos. 199103042-46. I was called as a State's witness and I testified on 2/8/00 and 2/9/00.
- 3. Just prior to my testimony, in the courthouse, Urick presented me with a document which I was viewing for the first time referred to as State's Exhibit 31. I remember reviewing one page of the document. Since this appeared to have ordinary AT&T cell site data on it, I accepted it as it was presented.
- 4. As an RF Engineer, I did not work with billing records (or subscriber activity reports) and had never seen AT&T Wireless billing or legal documents before I was presented with this document. RF Engineers worked with raw data from the switch. Billing records were separated from engineering activity for security and privacy.
- 5. What Urick did not tell me, or call my attention to, in relation to Exhibit 31, was that AT&T had previously issued the disclaimer that "Outgoing calls only are reliable for location status. Any incoming calls will NOT be considered reliable information for location."
- 6. If I had known that it was AT&T Wireless' legal policy for incoming calls to not be considered reliable information in determining cell phone location, I would have inquired further within my organization and attempted to learn why this disclaimer was issued.
- 7. If I had been made aware of this disclaimer, it would have affected my testimony. I would not have affirmed the interpretation of a phone's possible geographical location until I could ascertain the reasons and details for the disclaimer.
- 8. I consider the existence of the disclaimer about incoming calls to have been critical information for me to address. I do not know why this information was not pointed out to me.
- 9. I first conveyed the information above to Justin Brown and his cell tower expert, Jerry Grant, in a telephone call on September 29, 2015.

Abraham Waranowitz

Date