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1 DECLARATION OF WESLEY DOYLE

2 I, Wesley Doyle, declare as follows:

3 1. I am over the age of 18 and a United States citizen. I have personal
4 knowledge of the facts stated in this declaration and could testify competently to
5 them if called to do so. I do not have a financial interest in this case.

6 2. On April 30, 2015, I was employed at KECO, Inc. KECO's office is
7 located at 3235 Hancock Street, #2, in San Diego. KECO is located next to the Hi-
8 Lite Bookstore.

9 3. I arrived at work around 8 am. There were news crews surrounding
10 KECO and the other business, including in the alley between KECO and the
11 bookstore. Andy Bleier and I walked into the office together. I asked him what had
12 happened. He said that someone had been shot in the alley that night.

13 4. I walked into his brother Austin's office. Austin Bleier is the president
14 of Marine Sync. Austin was sitting at his computer. He asked me: "Do you want to
15 see the most fucked up video in your life?" I said yes.

16 5. Austin played a video on his computer. I understood that the video
17 contained footage from two surveillance cameras that KECO has on the side alley.
18 The video was from the previous night/morning, a few hours before I arrived at
19 work. I have watched this video (the "KECO Video") 20 to 30 times.

20 6. The video showed somebody I later learned to be Fridoon Rawshan
21 Nehad ("Fridoon"). Fridoon was walking at an average pace toward the eastern end
22 of the alley. As he had walked close to two thirds of the way down the alley, a
23 police car pulled up. A police officer, who I later learned to be Officer Neal
24 Browder, stepped out of the car. The car's overhead emergency lights were not
25 turned on.

26 7. Officer Browder got out of the car. He stepped around the driver's side
27 door, with the door remaining wide open, so there was nothing between him and
28 Fridoon. He took a relaxed stance. Fridoon continued to walk toward a dumpster at

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1 the northeast end of the alley. Without notice, when Fridoon was about 15 feet
2 away, Officer Browder raised his weapon and shot Fridoon.

3 8. There is no audio on the KECO Video. But I could tell when the
4 shooting occurred because there was a muzzle flash, which was clearly visible on
5 the video. Immediately after that, Fridoon collapsed.

6 9. The KECO Video was shocking to me and, I believe, to anybody else
7 who sees it. From what I recall, Officer Browder did not make any physical
8 movement in an attempt to communicate with Fridoon, i.e., raise his hand indicating
9 to stop. And Officer Browder did not use any other measures, such as a taser,
10 against Fridoon. He did not even get into a shooting stance. The shooting appeared
11 to be unprovoked; Officer Browder appeared to shoot Fridoon hastily.

12 10. From what I recall of the KECO Video, Fridoon's pace slowed when
13 Officer Browder appeared. And his pace slowed considerably when Officer
14 Browder drew his weapon. I believe Fridoon actually came to a complete stop
15 before Officer Browder pulled the trigger.

16 Under penalty of perjury, under the laws of the United States of America, I
17 declare that the foregoing is true and correct. Executed this 25th day of June, 2015,
18 at San Diego, California.

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WESLEY DOYLE