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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiffs,

v.

\$30,609.00 IN U.S. CURRENCY AND REAL PROPERTY – 6176-6184
FEDERAL BOULEVARD, SAN DIEGO (APN 543-020-0200)

Defendants.

Civil Case No. 37-2017-00012428-CU-AF-CTL
City Attorney No. 1163365

DECLARATION OF ATTORNEY ROBERT T. BRYSON

I, Robert T. Bryson, hereby declare as follows:

1. I am an attorney duly licensed to practice law before all of the courts of the State of California, and I am the principal attorney in the law firm of R.T. Bryson. I, along with Dharmi Mehta, represented Mr. Darryl G. Cotton in the criminal action M230071 filed in San Diego Superior Court. Except where otherwise stated, I have personal knowledge of the matters stated herein and if sworn as a witness could and would testify competently thereto.
2. I represented Mr. Cotton at the 5 April 2017 appearance in which Mr. Cotton pleaded guilty to HS 1166.5(a) Misd-17(b)(4).

1 3. At the time of the pleading, I understood that Mr. Cotton was forfeiting his rights
2 to all *items seized* on the 6 April 2016 raid. I did not and do not believe that Mr. Cotton consented
3 to his real property located at 6176 Federal Boulevard, San Diego, California 92114 would be
4 considered an *item* and thus encompassed within Mr. Cotton’s guilty plea.

5 4. I further understood that Mr. Cotton’s waiver extended solely to *seized* items. Mr.
6 Cotton’s real property was never seized, never received notice or a receipt that this property was
7 considered seize along with the other items seized on April 6, 2016, and therefore lies outside the
8 scope of the guilty plea entered on 6 April 2017.

9 5. Had Mr. Cotton been properly informed or had I been aware that the property at
10 6176 Federal Boulevard, San Diego, California 92114 was subject to a seizure, I would not have
11 advised Mr. Cotton to plead guilty to the charges negotiate by the City Attorney.

12 6. Mr. Cotton and I negotiated in good faith with the City Attorney’s office and at no
13 point was made aware that the subject property was deemed to be seized as a result of the events
14 that took place on April 6, 2016.

15
16 I declare under penalty of perjury under the laws of the state of California that the
17 foregoing is true and correct.

18 Executed this May 9, 2017, at San Diego, CA.

19 */s/ Robert T. Bryson II*
20 Robert T. Bryson II, Esq.