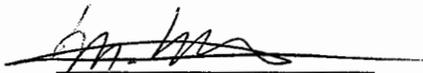


I, Muhammad Mateeullah, hereby declare under penalty of perjury under the laws of the State of Washington that the following statements are true and correct, that I am over the age of 18 years and competent to testify to them, and that I do so from my own personal knowledge:

- 1) I am originally from Pakistan, and have been in the US since I was 13. I came here with my family in 2003.
- 2) I worked at Toyota of Kirkland as a car salesman starting in about April 2013 for about eight months.
- 3) I quit and moved to another job partly because of the racism I observed at Toyota of Kirkland.
- 4) Whenever customers who had brown skin would come in, they would be treated differently and worse than Caucasians, especially in terms of profiling customers on sight. My managers included Peter Hubris, and Tony Pho. Jim Roes was the general manager. From my observation, some of the other managers had the same issues, but Peter was the worst. Lin Loy also seemed to profile customers unfairly, but Peter was the worst.
- 5) Peter seemed to always assume that Pakistanis, Indians and other brown Asian or Middle Eastern people were wasting his time and he would not try hard to make a deal. I noticed he treated the customers differently. When I would bring a proposed sale, he would look at me differently than when I would bring similar deals for Caucasian customers. The look on his face was as if he were pained to have to work with them. He would say things like "why are you even bringing this to me, this guy is not going to buy, tell him to get out." I could not even get him interested in selling to some customers sometimes. It was very frustrating.
- 6) I recall Peter saying "your people, they are just going to waste your time." This happened multiple times. He did not use language like "this customer is not going to buy" or this "guest" or "your customer" is not going to buy. The language "your people" felt very clearly to be a reference to Indian and Pakistani people, or people he thought were from my original homeland. He would say things like "You know your people don't buy shit, tell them to get out."
- 7) It seems clear that they hired me to sell to Pakistani and Indian people, in part due to my language skills, but it was strange that the other salesmen would not go out to help people who simply appeared to be from those countries. Instead, I was often encouraged to go talk to them when they walked onto the lot. Caucasian salespeople would tend to ignore the customers who looked like they were not American. It was assumed when a brown person walked onto the lot that they were not going to buy, because they were "cheap" or frugal, and that they were only here to compare prices, not buy.
- 8) Jim Roes never seemed to pay any attention to me, other than when we met for the first time. After that he ignored me, but he seemed friendly with the Caucasian sales people. He would have conversations with them, but never acknowledge non-white people, even if they were standing there.

SIGNED this 5<sup>th</sup> day of January, 2015, at Seattle, Washington.



Muhammad Mateeullah