

AFFIDAVIT OF [REDACTED]

I, [REDACTED], having been sworn, state as follows:

1. I am [REDACTED]. I am a resident of [REDACTED]. I am over the age of 18 and I have personal knowledge of the facts set forth in this affidavit.
2. I know Robert Keith English who is the owner of a martial arts school known as Tactical Martial Arts Academy, located at 9828D Midlothian Turnpike, Richmond, VA 23235. I know Robert Keith English because I trained at Tactical Martial Arts Academy from June, 2009 to January, 2015. From 2013 to 2015 I was also one of his instructors.
3. I was present between June, 2009 and January, 2015 and heard Robert Keith English make the following statements:
  - On more than one occasion, he stated that he was a former member of the United States Marine Corps. (He made these statements as part of his "sales pitch" to me when I visited the dojo, prior to becoming a student. He also stated that he received Special Forces combat training, and that if I became his student, I would benefit from his military knowledge and experience.);
  - I was present during several seminars that he teaches every year to students at VCU. In presenting his "bio" to the students, he always mentioned that he was a former Force Recon Marine.
  - On multiple occasions, he related experiences as a Marine during classes. (These statements were usually made to illustrate what would happen under direct stress in a combat situation. There are too many instances of this to list each one, but he made these types of statements at least 2 or 3 times a week for the entire 5 ½ years that I was a student.)
  - He stated that he was knowledgeable about EOD and that his Marine training covered bomb deactivation, disassembly and tactical explosive use. He stated that he employed these skills during some of the missions he was involved in.
  - He stated that his military background taught him the value of integrity and honor.

- As I was preparing for my Black Belt test, which required that I fight 4 rounds of full contact kickboxing with him, on multiple occasions during the 3 months leading up to the test, he asked me why I didn't train with him and stated that no one else could teach me the techniques and skills that he possessed from his Marine training.
  - The first Christmas after I started training with him I gave him a book on Marine history and while looking at it, he began to share his experiences as a Marine and related how during his service he had done some of the things represented in the photos and that he had been a member of or worked with some of the groups or teams depicted.
  - For several months he was working as an instructor at an airsoft facility called Tactical Response Unleashed which gives civilians the opportunity for civilians to experience "CQB" and invited me to come "check it out". I attended one of these sessions and during the briefing, he stated to those in attendance that he would be teaching us the same techniques that he was taught during his time in the Marine Corps. (He also alluded to learning police tactics while working with the "police force" within his military unit.)
  - After I became an instructor in 2013, he would instruct me to cater to the students that had a military background in order to retain them and help grow his business. He stated that they attended because of his Marine background and we should do all we can to keep them interested in the program.
4. In addition to the oral statements he personally made attesting to his service as a Marine, Mr. English also made written claims and did other acts to hold himself out as having served as a Marine. Specifically, he
- Claimed in his bio on his website, that he was a Force Recon Marine. (This claim was subsequently removed from his bio, but it was there when I joined in 2009).
  - He has obtained what appears to be a Force Recon tattoo on his shoulder. (I saw this tattoo on several occasions as he changed his shirt in the training area and he stated to me that he got the tattoo during his time in the Marine Corps.)
  - When other students, believing that he had served as a Marine, gave him Marine Corps themed gifts and thanked him for his service, he readily accepted them without contradicting the implied acknowledgment of his service. On the contrary, he would often openly express his appreciation to them and would often tell "war stories" about his experiences in Force Recon.

- Similarly, on military holidays or anniversaries, when students and friends would thank him for his service in person and on social media, he would acknowledge their thanks and appreciation verbally or in writing.


FURTHER AFFIANT SAYETH NOT



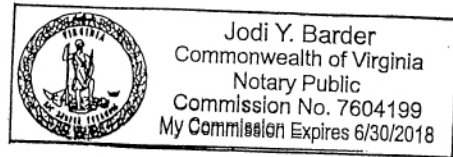
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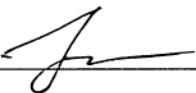
COUNTY/CITY OF Henrico

The foregoing Affidavit was subscribed and sworn before me in the jurisdiction aforesaid this

23<sup>rd</sup> day of July, 2015, by 

My commission expires 6/30/18



  
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Notary Public