

Exhibit B

STATE OF MICHIGAN

IN THE WAYNE COUNTY CIRCUIT COURT

PEOPLE OF THE STATE OF MICHIGAN,

Plaintiff,

Hon. Patricia S. Fresard

VS

KEVIN DESHAWN SYKES,

Defendant.

AFFIDAVIT OF FELICIA MARIE DYER

BEFORE ME, the undersigned notary personally appeared Felicia Dyer, who being by me first duly sworn, on her oath, deposes and says:

1. I, Felicia Dyer, on the early morning of December 29, 2001 went to Page's Palace with my god-sister, Chanika Moore. We were looking to get a few drinks.
2. We were at the bar for about ten minutes before we decided to leave because I saw "Soup"—a guy I had seen around the neighborhood, 7 Mile area, and at the Blue and Gold Club—standing at the door with the gun. The gun was an army type rifle and he was holding it under his coat.
3. As we were leaving, I saw Soup walk out of Page's Palace with the gun, and I heard the shooting occur as I was leaving the area in my vehicle.
4. The prosecution, during cross examination, questioned me regarding Chanika Moore, my god-sister. The prosecution seemed to think that Chanika Moore was related to Tyrone Moore – an individual who went to the police station about this shooting. The prosecutor

continued to question me about this until I felt beaten down by the questioning. However, Chanika Moore is not related to the Tyrone Moore associated with this case. Chanika Moore has an uncle named Tyrone Moore, but he was never involved in this case, and only shares a common name.

5. During a conversation I had with Randall Upshaw, Mr. Sykes's trial attorney, I lied about the description of the shooter. I did not give the description or the name of the shooter I saw, because I did not want to implicate someone who was not in police custody due to fear of my own safety. I feared retaliation of the actual perpetrator: I knew Soup had a reputation for being someone you did not want to cross.
6. During my testimony at trial, I was never questioned about the description of the shooter by either the prosecution or the defense. Additionally, I never spoke with Mr. Sykes's appellate attorney.
7. The shooter actually had a dark complexion, short hair, and he was a little taller than me with heels, so about 6 feet. He was wearing a dark t-shirt and jeans. I immediately recognized him as Soup.
8. I have never personally known either Soup, or Kevin Sykes. I had, however, seen both of them around the neighborhood before.
9. Sykes was not the individual I saw with the gun on the early morning of December 29, 2001.
10. Students from the Michigan Innocence Clinic came to meet with me on 03/19/15. This was the first time I told the truth about what I saw that night, provided a description of the man with the gun, and what I believe to be his street name.

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11. I have never spoken with Kevin Sykes or any of his friends or family about this case.

Before talking to Michigan Innocence Clinic, I never talked to any of Sykes's attorneys about this case.

12. I have not been intimidated, coerced, bribed, threatened, or in any way forced into signing this statement. I have no incentive to lie in this statement.

Further Affiant sayeth naught.

This 10 day of July, 2015.

Felicia Dyer
Felicia Dyer

Subscribed and sworn to before me on July 10, 2015 in Washtenaw County, Michigan.
My commission expires: 12/9/18

Signature: *Joanne Odom*
Notary Public, State of Michigan, County of Washtenaw

Joanne Odom
JOANNE ODOM
NOTARY PUBLIC, STATE OF MI
COUNTY OF WASHTENAW
MY COMMISSION EXPIRES Dec 9, 2018
IN COUNTY OF MI