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 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT

13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 STEPHEN WILLIAM BEAL,

18 Defendant.

No. SA CR 19-047-JLS

GOVERNMENT'S SENTENCING POSITION;
 EXHIBITS

Hearing Date: January 19, 2024

Hearing Time: 8:30 a.m.

21 Plaintiff United States of America, by and through its counsel
 22 of record, the United States Attorney for the Central District of
 23 California and Assistant United States Attorneys Mark Takla,
 24 Annamartine Salick, Sarah Gerdes, and Solomon Kim hereby files its
 25 Sentencing Position for defendant STEPHEN WILLIAM BEAL.

26 //

27 //

28

1 This sentencing position is based upon the attached memorandum
2 of points and authorities, the Presentence Investigation Report, the
3 files and records in this case, and such further evidence and
4 argument as the Court may permit.

5 Dated: January 5, 2024 Respectfully submitted,

6 E. MARTIN ESTRADA
7 United States Attorney
8 CAMERON L. SCHROEDER
9 Assistant United States Attorney
 Chief, National Security Division

10 *Mark Takla*

11 MARK TAKLA
12 ANNAMARTINE SALICK
13 SARAH GERDES
 SOLOMON KIM
 Assistant United States Attorneys

14 Attorneys for Plaintiff
 UNITED STATES OF AMERICA

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

Defendant STEPHEN WILLIAM BEAL's crimes are some of the most heinous seen in this district. He faces sentencing for the bombing murder of his ex-girlfriend, Ildiko Kranjyak ("Ildiko"). The bomb dismembered Ildiko, blew pieces of her out a window, and caused her midsection, arms, and hands to disintegrate. The bomb seriously wounded two others who miraculously survived, despite standing a few feet from Ildiko when the bomb exploded. A jury convicted defendant of four counts: 18 U.S.C. § 2332a(a)(2) (Use of a Weapon of Mass Destruction Resulting in Death); 18 U.S.C. § 844(i) (Malicious Destruction of a Building Resulting in Death); 18 U.S.C. § 924(c) (Use of a Destructive Device During and in Relation to a Crime of Violence); and 26 U.S.C. § 5861(d) (Possession of an Unregistered Destructive Device). The government recommends that the Court impose the maximum punishment for these offenses: a lifetime of imprisonment plus a mandatory consecutive sentence of thirty years of imprisonment, a supervised release term of five years, a special assessment of \$400, and restitution.

The Presentence Investigation Report ("PSR") concluded that defendant's (1) base offense level is 43 based on U.S.S.G. § 2A1.1 (First Degree Murder); and (2) criminal history category is I. The guideline range is a lifetime of imprisonment plus 30 years; a fine of \$50,000 to \$500,000, a 2-5 year term of supervised release, and a mandatory special assessment of \$400. (PSR, at 3; Recommendation Letter, at 1-2.) The government agrees with the Probation Office's guideline calculations, recommended sentence, and recommendation regarding restitution. For the reasons outlined below, a lifetime of

1 imprisonment is the only appropriate sentence for defendant's
2 horrific offenses.

3 As the government has not received all restitution information
4 at the time of this filing, the government requests a deferred
5 restitution hearing set 90 days from sentencing pursuant to 18 U.S.C.
6 § 3664(d)(5).

7 **II. CORRECTIONS AND ADDITIONS TO THE PRESENTENCE REPORT**

8 Paragraph 9 - The PSR incorrectly states that defendant and
9 Ildiko dated for 18 months, as they met on June 24, 2016 and had
10 known each other for approximately 23 months prior to the murder.
11 (TEX.¹1200A, at 1.)

12 Paragraph 10 - Defendant threatened to kill himself after Ildiko
13 told him she needed "space . . . [f]or a long time." (TEX. 1200C, at
14 32.) Defendant found out that Ildiko was seeing two men during the
15 couple's March 2018 trip to Portugal. (Defendant's Interview, TEX.
16 1497; TEX. 1186A.) During the trip, defendant took pictures of
17 Ildiko's text messages with one of the other men. (TEX. 1186A.)

18 Paragraph 13 - The government recommends removing the language
19 "and ignoring I.K's pleas to leave her alone."

20 Paragraph 15 - The government recommends removing the date. The
21 government cannot say for certain when defendant left the box for
22 Ildiko.

23 Paragraph 62 - Defendant purchased two containers of lead
24 tetroxide approximately 6 months prior to his wife's fall down the
25

26
27 ¹ "TEX." Refers to the Government's Trial Exhibits. Exhibits
28 designated by "Ex." and a letter are exhibits to this filing. The
government did not include all cited to trial exhibits in this
filing. The government can provide them if requested.

1 staircase and toxicology report showing elevated levels of lead in
2 her system. (TEx. 781A; Ex. C.)

3 Paragraph 66, Recommendation Letter, at 4 - Defendant met
4 Valerie Stone in person for the first time on April 21, 2018, which
5 was approximately three weeks prior to the bombing and approximately
6 two weeks prior to purchasing the battery and box. (TEx. 1524.)

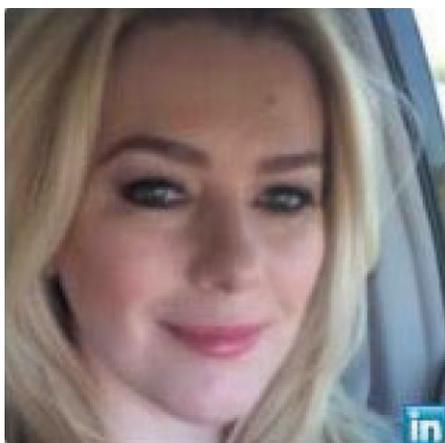
7 Recommendation Letter, at 5 - From 2019 through 2022, Valerie
8 Stone received approximately \$160,000 in defendant's fraudulent
9 disability payments. (TEx. 832; Ex. E.)

10 **III. BACKGROUND**

11 The following information is from the PSR or the exhibits and
12 testimony presented at trial.

13 **A. Ildiko Krajnyak**

14 Ildiko was the American dream. She immigrated to the United
15 States from Hungary to make a better life for herself. [Testimony of
16 Eva Boni, 6/21/2022 RT 793; Ex. A.]



24
25 She worked hard. She established her own successful business
26 providing esthetician services to those in Orange County. She had a
27 family who loved her. She had clients who loved her. And at the
28

1 time of her murder, she was taking care of her mother who had
2 dementia. [Testimony of Ronilo Vestil, 7/05/2022 RT 2249.]

3 **B. Defendant's Relationship with the Ildiko**

4 Defendant met Ildiko on a dating application in June 2016, and
5 began dating exclusively. (Exhibit 1200A, at 1.) Their relationship
6 was emotional. (PSR ¶¶ 10-12.)

7 Three months prior to the bombing, defendant threatened to kill
8 himself after Ildiko told him she needed space. (TEx. 1200C, at 32.)

9 The following month, defendant took Ildiko on a trip to
10 Portugal, where he spent almost \$10,000, including the purchase of a
11 \$5,000 Louis Vuitton purse. (TEx. 828.) During the trip to
12 Portugal, defendant learned that Ildiko was also dating two other
13 men. (Defendant's Interview, TEx. 1497; TEx. 1186A.) He learned
14 that Ildiko would be seeing one of the men during her Hungary trip
15 scheduled for May 2018. (TEx. 1186A.)

16 In April 2018, defendant attempted to win her back and took
17 Ildiko on a \$3,000 trip to Puerto Vallarta, Mexico. (TEx. 829.)
18 During this trip Ildiko told a friend that she was no longer
19 interested in defendant romantically. (TEx. 1567.)

20 In the month prior to the bombing, defendant repeatedly
21 attempted to see Ildiko, but Ildiko turned him down. (TEx. 1200C.)

22 **C. The Bombing**

23 At some point, defendant formulated a plan to kill Ildiko while
24 she was on a trip to Hungary. Defendant had a specialized expertise
25 in making fireworks and building high-powered rockets which he had
26 honed over many years. (PSR ¶ 18.) Defendant was an expert in
27 mixing explosive chemicals and building electrical fusing systems,
28 and used these skills to murder her. (Id.)

1 Defendant had over 130 pounds of explosive precursor chemicals
2 in his house. (PSR ¶ 17.) He also had wires and electric matches to
3 build an electrical fusing system. (Id.)

4 Defendant built a bomb, placed it in a cardboard box, and left it
5 at Ildiko's spa. (PSR ¶ 15.) Seven days prior to the bombing,
6 defendant purchase three 12"x6"x6" boxes. (PSR ¶ 20.) Six days
7 prior to the bombing, he purchased a Company A 9-volt battery in
8 cash. (Id.) On multiple occasions prior to the bombing, security
9 footage and cellular site analysis placed defendant at Ildiko's spa,
10 the bomb site. (PSR ¶ 4.) He also had a key to the spa and could
11 come and go as he pleased. (Id.)

12 On May 15, 2018 at approximately 1:05 p.m., Ildiko picked up a
13 12"x6"x6" box, placed it on her desk, and began to open it. (PSR
14 ¶ 16.) The bomb exploded instantly killing her, dismembering her
15 body, throwing her leg and torso through a window, and disintegrating
16 her midsection, arms, and hands. (Id.) Two of Ildiko's clients were
17 severely injured. (Id.) The building and surrounding area,
18 including a preschool across from the spa were evacuated. (Ex. I.)

19 The FBI found bomb fragments - yellow wire and Company A 9-volt
20 battery cells - in the ceiling above Ildiko's desk. (PSR ¶ 19.) The
21 oxidizer used in the bomb matched explosive chemicals found in
22 defendant's house. The battery, box, wires, and oxidizer connected
23 the bomb directly to defendant. (PSR ¶¶ 18-19.)

24 **IV. GUIDELINES CALCULATIONS**

25 The government concurs with the USPO's guideline calculations
26 and criminal history category.

27 The government agrees that Counts 1-2 and 4 are grouped for
28 guideline calculations as they involve the same victim connected by

1 the same objective and common scheme. (PSR ¶ 31.) Count 3 is not
2 grouped with the other counts as the statute mandates a consecutive
3 mandatory sentence. (PSR ¶ 32.)

4 The guideline for Count 1 - a violation of 18 U.S.C.
5 § 2332a(a)(2) (Use of a Weapon of Mass Destruction Resulting in
6 Death) - is U.S.S.G. § 2M6.1. (PSR ¶ 33.) If the defendant caused
7 intentional or knowing death, the cross-referenced guideline of
8 U.S.S.G. § 2A1.1 applies. U.S.S.G. § 2M6.1(c)(1). In this case,
9 defendant built and planted a bomb for the victim to open in her
10 business. There is no question that defendant intended to cause
11 Ildiko's death.

12 Base Offense Level

13 (First Degree Murder with death): 43 U.S.S.G. § 2A1.1
14 (PSR, at 4; Recommendation Letter, at 1-2.) Defendant has one
15 criminal history point resulting from his guilty pleas to fraud
16 offenses on November 9, 2023 and is in criminal history category I.
17 Defendant's guidelines range is a lifetime of imprisonment, a
18 supervised release term of 2-5 years (Counts 1 to 3), a fine of
19 \$50,000 to \$500,000, and a special assessment of \$400. In addition,
20 due to his conviction under Count 3, the Court must impose a 30-year
21 term of imprisonment consecutive to the initial term of imprisonment
22 imposed.

23 **V. VICTIM IMPACT AND RESTITUTION**

24 The government identified over 30 victims under 18 U.S.C.
25 §§ 1593, 3663, and 3663A in this case: (1) the decedent, Ildiko, and
26 her family members; (2) the injured survivors who were in the spa
27 when the bomb exploded, referred here as Victim #1 and Victim #2; (3)
28 everyone who was in or near 11 Mareblu at 1:05 p.m. on May 15, 2018

1 when the bomb exploded; and (4) commercial harm to 11 Mareblu's owner
2 and insurer. At this time, three crime victims have requested the
3 ability to speak at the sentencing hearing pursuant to the Crime
4 Victims' Rights Act, 18 U.S.C. § 3771(a)(4). At this time, the
5 government estimates a total of ten minutes for these three victims,
6 but that may increase if additional crime victims wish to address the
7 Court.

8 The government has been diligent in attempting to collect victim
9 impact statements and identify restitution amounts, however the
10 number of victims has slowed the process. As the government was not
11 able to include all such information in this filing, the government
12 requests a deferred restitution hearing set 90 days from sentencing
13 pursuant to 18 U.S.C. § 3664(d)(5).

14 1. Ildiko and Her Family

15 Ildiko died in the prime of her life at the age of 48.
16 Defendant's crimes left a son without a mother and other family
17 members without their loved one. Ildiko's family must also live with
18 the ghastly way defendant took her life.

19 Ildiko's husband stated that defendant's crimes took his family
20 away from him and that guilt keeps him from allowing himself full joy
21 and happiness. (Underseal Ex. AA.)

22 Ildiko was also described as:

23 • "Totally passionate, outgoing . . . Really big heart . . .
24 wears her heart on the sleeve" by Beth Baumhardt.

25 [6/21/2022 RT 745.]

26 • "Independent, happy, very hard worker" who made her own
27 money early and didn't depend on her parents by Eva Boni.

28 [6/21/2022 RT 793.]

- 1 • "She was beautiful . . . kind, caring, supportive. Just a
2 really amazing . . . good person" by Jett Martin.

3 [6/22/2022 RT 346.]

4 Ildiko's family requests that the Court impose a lifetime of
5 imprisonment.

6 2. Victim #1 and Victim #2

7 Victim #1 and her mother, Victim #2, were in the day spa when
8 the bomb went off. They had just finished receiving facials as a
9 special treat for a wedding they were attending that weekend. As
10 Victim #1 recounted during her trial testimony, she pulled her mother
11 close to her after their facials and stated "we look so cute."

12 [6/22/2022 RT 15.]

13 Seconds later, both of their lives changed forever. [6/22/2022
14 RT 17.] The government is not going to rehash their harrowing escape
15 from the bomb site as Victim #1 has testified to her experience in
16 two trials. Victim #1 described the haunting vision of Ildiko
17 opening the box as the first thing she sees when she wakes up in the
18 morning and that last thing she sees before she goes to bed.

19 [6/22/2022 RT 16.]

20 Victim #1 was hospitalized in the intensive care unit for two
21 weeks with second and third degree burns and shrapnel injuries.
22 Victim #2 was also hospitalized with second and third degree burns
23 and lost one eye due to bomb shrapnel. (PSR ¶ 26.) Their treating
24 physician, Dr. Andrea Dunkelman testified about the treatment for
25 such injuries which included scraping the burned and dead skin from
26 their bodies. [6/22/2022 RT 743-764, Underseal Ex. BB.] A picture
27 of this process is at Underseal CC. There is no question that these
28 injuries caused both excruciating pain and suffering.

1 Victim #1 also stated that she was having a difficult time with
2 opening packages after the bombing. [Testimony of Ashley Mericle,
3 7/27/2022 RT 5050.]

4 3. Other Individuals in the Building

5 Other individuals in or near the building were also harmed:

6 Victim #3 reported that she has a fear of opening packages to
7 this day, suffers post-traumatic stress disorder, and felt anxiety
8 and emotional stress due to the loss of her income. (Underseal Ex.
9 DD.)

10 Victim #4 reported that she suffered from swelling and rashes
11 due to debris from the ceiling after the bomb went off and that she
12 feared opening packages and mail. (Underseal Ex. EE.)

13 Victim #5 reported that defendant's crimes caused her a great
14 deal of pain, fear, and loss, and suffered a substantial financial
15 hardship. (Underseal Ex. FF.)

16 Victim #6 reported she suffered from post-traumatic stress
17 disorder, that she was unable to do the things she enjoyed, and that
18 she will never have a sense of safety in her workplace again.
19 (Underseal Ex. GG.)

20 4. Commercial

21 The company that insured 11 Mareblu lost \$2.1 million in
22 insurance payments due to defendant's crimes. (Ex. J.)

23 **VI. SENTENCING FACTORS**

24 In determining the appropriate sentence, the Court must consider
25 the factors under 18 U.S.C. § 3553(a).

26 First, the Court must consider the nature and circumstances of
27 the offense. Defendant's crimes are particularly gruesome and
28 chilling. Tragically, defendant targeted one woman, his ex-

1 girlfriend. Her life ended when she opened a box. Diabolically,
2 defendant also caused catastrophic physical and emotional damages to
3 countless others with absolutely no connection to him, and who had
4 the misfortune of being in the room or near the room when the bomb
5 went off. Defendant knowingly chose a method of murder that would
6 guarantee immense and immeasurable collateral damage. He did not
7 care when the bomb would go off and who would be around. This bomb
8 went off at lunchtime in a busy commercial office building on a
9 weekday. The fact that only one person died and only two others were
10 hospitalized is pure luck and nothing less than a miracle. This act
11 could have easily caused additional injuries and deaths. Had
12 defendant's chemistry been off, he could have leveled the entire
13 building or even the block. Defendant's callousness, depravity, and
14 complete disregard for human life was sociopathic. The nature and
15 circumstances of the offenses warrant the maximum punishment under
16 the law.

17 Next, the Court must consider the history and characteristics of
18 the defendant. Defendant has engaged in criminal conduct for many
19 years and while in pretrial custody on the bombing offenses. He
20 committed disability insurance fraud, bankruptcy fraud, and Social
21 Security fraud, unjustly enriching himself of almost \$1.5 million in
22 totality over a decade. The government also notes the highly
23 suspicious circumstances of his prior wife's death: (1) the taking
24 out of an accidental death policy six weeks before she fell down a
25 staircase in his presence; (2) defendant's failure to tell
26 investigators that he was present for the fall; (3) his purchase of
27 lead tetroxide approximately six months prior to toxicology reports
28 showing she had elevated levels of lead in her system; (4)

1 defendant's claim that the lead poisoning was caused by a prior owner
2 making fishing lures in the house; and (5) defendant's failure to
3 cooperate with the doctor treating her in the hospital. (PSR ¶¶ 61-
4 62.) Defendant gave his girlfriend \$160,000 of fraudulent disability
5 money, yet also provided an affidavit to this Court claiming to be
6 indigent. Defendant appears to have been emboldened by his history
7 of criminal conduct. Defendant's history and characteristics warrant
8 a severe sentence.

9 Third, a lifetime of imprisonment is the only sentence that
10 reflects the seriousness of the offense, promotes respect for the
11 law, and provides just punishment for the offense. Ildiko's family
12 will never see her again. Defendant's crime has left a grieving son,
13 grieving widower, grieving brother, and grieving friends. Victim #1,
14 Victim #2, and others have to live with life-altering physical and
15 emotional injuries, including post-traumatic stress disorder,
16 anxiety, and a lack of feeling safe. Indeed, a sentence any less
17 than a lifetime of imprisonment plus 30 years of incarceration for a
18 murder of this nature risks undermining respect for the law and
19 inadequately reflecting the seriousness of the offense.

20 Fourth, a lifetime of imprisonment will protect the public from
21 further crimes of defendant. Defendant was raised in a middle-class
22 household with loving parents. He earned a college degree. He had
23 all the advantages in this world. Despite these circumstances and
24 his mature age, he engaged in at least a decade of criminal conduct
25 anyway. The public needs to be protected from him.

26 The recommended sentence also affords adequate deterrence to
27 criminal conduct, and adequately protects the public from further
28 crimes of this defendant.

1 **VII. ADDITIONAL SUPERVISED RELEASE CONDITIONS**

2 While the government requests a lifetime of imprisonment, the
3 government does not know what the Court will impose or whether
4 defendant will actually serve the totality of the imposed sentence.
5 The government proposes the following additional supervised release
6 conditions:

7 1. The defendant shall submit to his person and property -
8 including any residence, premises, vehicle, container, papers,
9 effects, and computers, cellular telephones, and other electronic
10 communications or digital storage devices or media under his control
11 - to search and seizure at any time of the day or night by any law
12 enforcement officer or probation officer, with or without a warrant,
13 probable cause, or reasonable suspicion.

14 2. The defendant shall not possess, attempt to possess, have
15 under the defendant's control, or have access to explosives,
16 oxidizers, explosive fuels, explosive chemicals, pyrotechnic powders,
17 gunpowder, smokeless powder, chemicals to make explosive powders,
18 fireworks, electric matches, blasting caps, electric squibs,
19 igniters, and fuses.

20 The government believes these proposed supervised release
21 conditions are necessary in light of the nature and seriousness of
22 defendant's offenses.

23 **VIII. CONCLUSION**

24 For the foregoing reasons, the government recommends the Court
25 sentence defendant to lifetime of imprisonment plus thirty years, a
26 five-year period of supervised release, a mandatory special
27 assessment of \$400, and restitution. This term consists of a
28 lifetime of imprisonment on Counts 1 and 2 to be served concurrently,

1 10 years on Count 4 to be served concurrently to Counts 1 and 2, and
2 30 years on Count 3 to be served consecutively to Counts 1, 2, and 4.

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DECLARATION OF MARK TAKLA

I, Mark Takla, declare as follows:

1. I am the Assistant United States Attorney assigned to this matter. I have knowledge of the facts set forth herein and could and would testify to those facts fully and truthfully if called and sworn as a witness.

2. Exhibit A is a true and correct copy of pictures of Ildiko Kranjyak and her family.

3. Exhibit C is a true and correct copy of business records obtained from Skylighter, Inc.

4. Exhibit H is a true and correct copy of text message Ildiko Krajnyak exchanged with her friend.

5. Exhibit I is a true and correct copy of a picture taken immediately after the bombing on May 15, 2018.

6. Exhibit J and Underseal Exhibits AA, DD through GG are true and correct copies of victim impact statements.

7. Underseal Exhibit BB is the trial testimony of Dr. Andrea Dunkelman.

8. Underseal Exhibit CC is a true and accurate copy of pictures of the medical treatment of Victim #1 at the hospital after the bombing.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed in Santa Ana, California, on January 5, 2024.

Mark Takla

MARK TAKLA

EXHIBIT A

Fwd: [EXTERNAL EMAIL] - Ildiko's eulogy

Nicholas Vicencia <nsvicencia@fbi.gov>

Thu 1/4/2024 10:53 PM

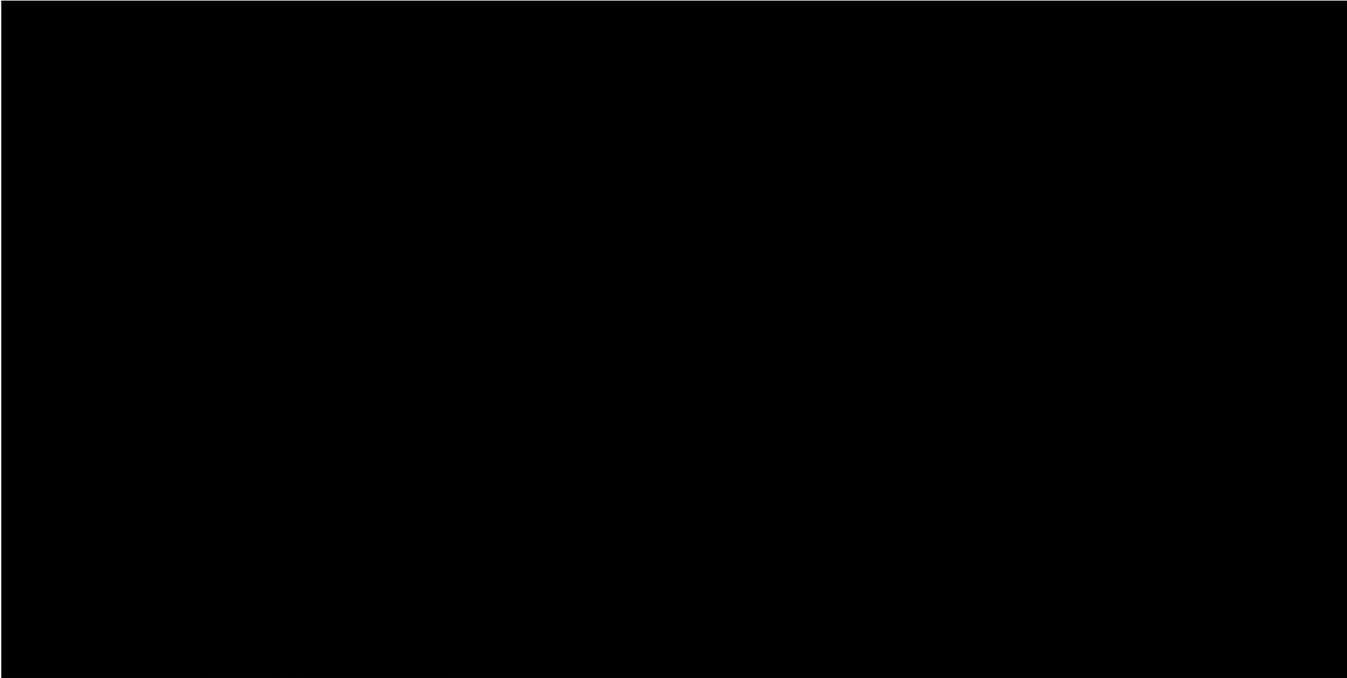
To:Takla, Mark (USACAC) <mtakla@usa.doj.gov>

From: nilo <niloteknos@gmail.com>

Sent: Thursday, January 4, 2024 10:51:07 PM

To: Vicencia, Nicholas S. (LA) (FBI) <nsvicencia@fbi.gov>

Subject: [EXTERNAL EMAIL] - Ildiko's eulogy



Mass of Remembrance



Ildiko Krajnyak

June 8, 1969—May 15, 2018

26 May 2018

10:00 am

San Francisco Solano Catholic Church

Rancho Santa Margarita, CA

Ildiko Krajnyak

Mother – Wife – Daughter – Sister – Friend

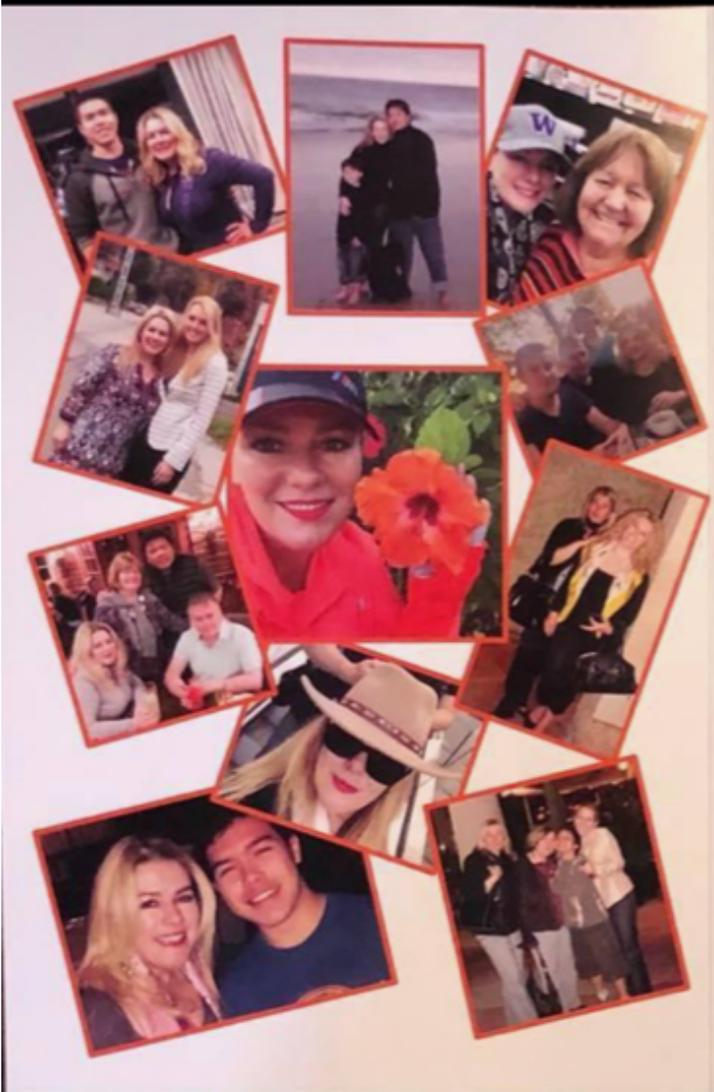


June 8, 1969 – May 15, 2018



**What we have once enjoyed
and deeply loved
We can never lose,
For all that we love deeply
Becomes a part of us.**

- Helen Keller



Ildiko Krajnyak

Ildiko was born on June 8, 1969 in Miskolc, Hungary to Juliana and Laszlo Krajnyak. Soon after graduating from high school, she pursued studies and training in the field of cosmetology, specializing in skin care. Ildiko established her own private salon in her hometown before immigrating to the United States in 1992.

Ildiko was known as a very hard worker. She took on many different jobs until establishing herself in the beauty industry in the U.S. Ildiko worked for various international beauty product companies, including Yon-ka, Pevonia and most recently, Cinque Monde. She was an educator, trainer and marketer of their fine beauty products.

Ildiko, when not traveling for her employer, made time to treat clients in her private salon, Magyar Kozmetika. Ildiko was extremely passionate about her work and was devoted to her son, husband and mother. Those who were blessed to be one of Ildiko's clients all knew how proud she was of her son, Keanu.

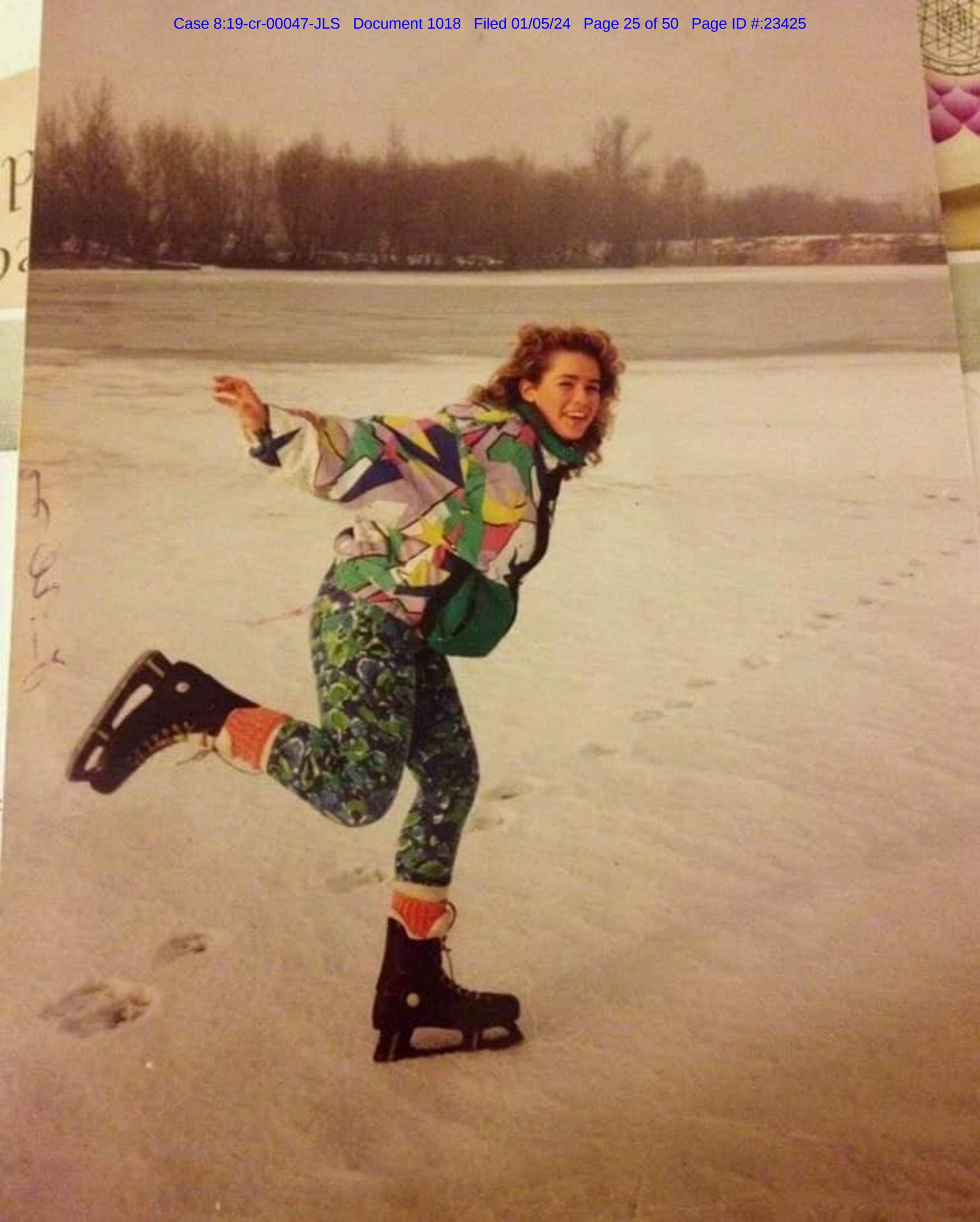
Ildiko was an intelligent, loving and strong woman who never took no for an answer. Her beauty and grace along with her always positive attitude, charming personality and contagious smile left all those who knew her feeling loved.

She is survived by her son Keanu; her unconditionally loving husband, Nilo Vestil; her mother, Julianna Krajnyak; brother, Laszlo Krajnyak; cousin, Eva Boni; niece and nephew, Barbara and Marco Krajnyak.



*Gone from our sight,
but never from our memories.
Gone from our touch,
but never from our hearts.*





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January 1, 2014

07:45

Edit

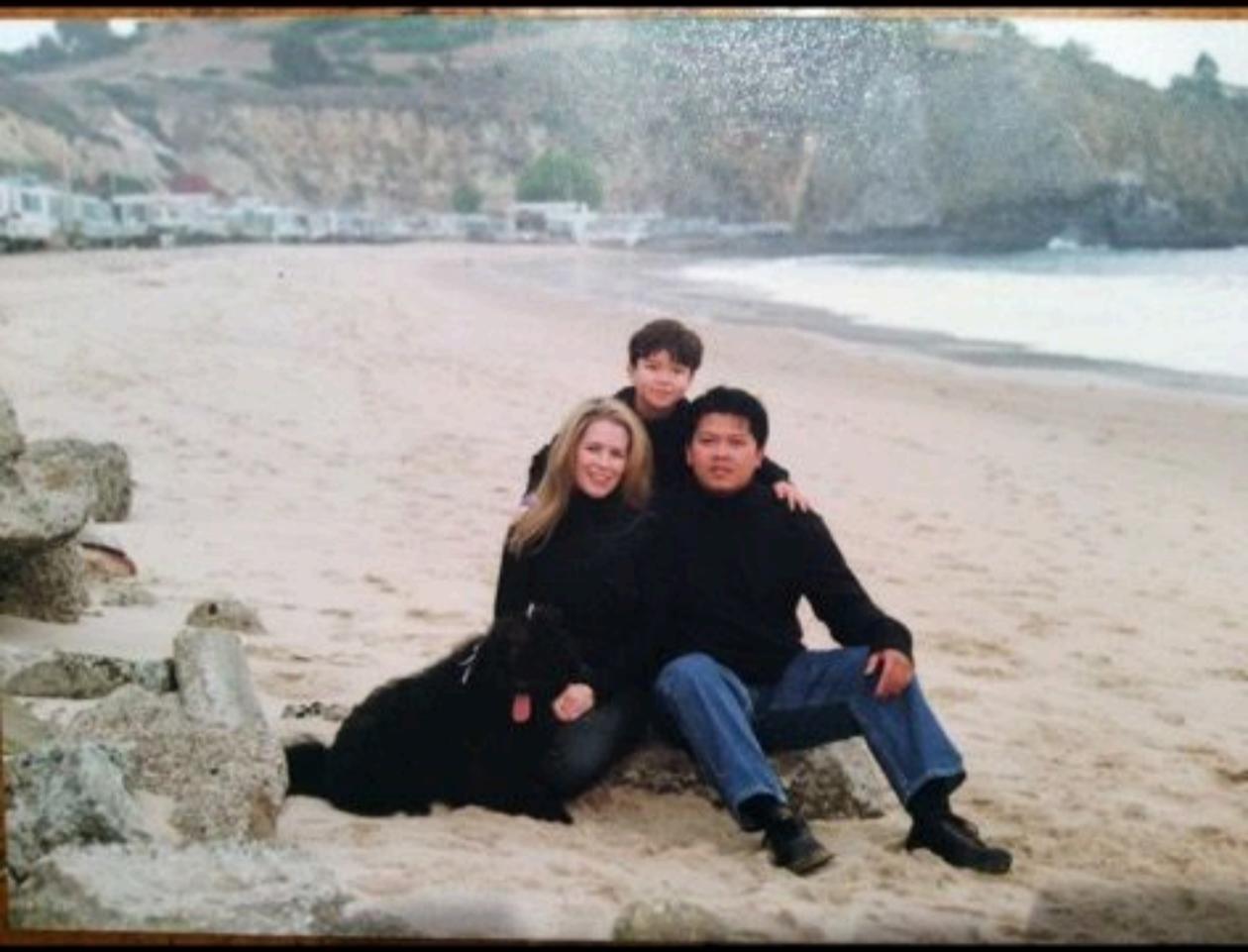


14:36



May 28, 2018
10:39

Edit





USA_518969



EXHIBIT C

Skylighter, Inc.
 P.O. Box 480
 Round Hill, VA 20142-0480
 540/338-3877 540/338-0968 (Fax)

Order # 57060A	COPY	Invoice Date 08/20/07	Page 1
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Bill To Stephen Beal 	Ship To
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Customer No. 11327	Sales I.D. HEG/LSK	Reference #	Source CS /ISKY	Terms XXXXXXXXX6476 VISA
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Ordered By	Warehouse	Phone Number (714) 916-2965	Total Wt. 0.0 Lbs	Zone	Pkg 0	Ship Via DS
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Thank you for your order. Your credit card charge will show up under "Skylighter" on your monthly credit card statement. Out-of-stock items in B/O column will be shipped as soon as they're back in stock.

Qty	B/O	Ship	Item #	Description	Un. Price	Ds	Amount	
1	0	1	CH5517	Lead Tetraoxide*	12.21	--	12.21	
1	0	1	CH8112	Ferro-Titanium, -40-325 mesh	21.89	--	21.89	
1	0	1	CH8180	Magnesium Carbonate	8.60	--	8.60	
1	0	1	INSUR	Insurance on shipment 2%	0.85	--	0.85	
1	0	1	SURCHARGE	5% Surcharge - Regulatory Compliance	2.14	--	2.14	
							MERCHANDISE INVOICE TOTAL \$	45.69
							SHIPPING & HANDLING \$	13.22
							INVOICE TOTAL \$	58.91
							CR. CARD: VI, APPR:041553 \$	-58.91

Skylighter, Inc.
 P.O. Box 480
 Round Hill, VA 20142-0480
 540/338-3877 540/338-0968 (Fax)

Order # 57411A	COPY	Invoice Date 08/28/07	Page 1
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Bill To Stephen Beal 	Ship To
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Customer No. 11327	Sales I.D. HEG/LSK	Reference #	Source CS /ISKY	Terms XXXXXXXXX6476 VISA
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Ordered By	Warehouse	Phone Number (714) 916-2965	Total Wt. 0.0 Lbs	Zone	Pkg 0	Ship Via DS
------------	-----------	--------------------------------	----------------------	------	----------	----------------

Thank you for your order. Your credit card charge will show up under "Skylighter" on your monthly credit card statement. Out-of-stock items in B/O column will be shipped as soon as they're back in stock.

Qty	B/O	Ship	Item #	Description	Un. Price	Ds	Amount	
2	0	2	CH5200	Potassium Chlorate*	7.75	--	15.50	
1	0	1	CH5517	Lead Tetraoxide*	12.21	--	12.21	
5	0	5	CH8068	Charcoal, Air Float	4.29	8	19.73	
3	0	3	CH8169	Lactose	7.65	--	22.95	
1	0	1	CH8180	Magnesium Carbonate	8.60	--	8.60	
1	0	1	INSUR	Insurance on shipment 2%	1.58	--	1.58	
1	0	1	SURCHARGE	5% Surcharge - Regulatory Compliance	3.95	--	3.95	
							MERCHANDISE INVOICE TOTAL \$	84.52
							SHIPPING & HANDLING \$	28.50
							INVOICE TOTAL \$	113.02
							CR. CARD: VI, APPR:038788 \$	-113.02

EXHIBIT E

Funds from Stephen Beal to Valerie Stone**Source of Funds: Beal - Chase Account Ending 3350 and 5309****Signers: Stephen Beal; Valerie Stone - Added 3/27/2019****Funds Received by Stone: Union Bank Acct Ending 7828, Wells Fargo Acct Ending 1976, US Bank REI****Mastercard Ending 6980 and Western National****Period: April 1, 2018 - June 25, 2022****FoA: Lorrie Hirsch**

Deposits Received From Beal	Begin 4/1/2019	2020	2021	2022	Grand Total
Chase Ckg 984673350 - Beal	\$26,129.84	\$49,274.79	\$53,001.85		\$128,406.48
Union Acct Ending 7828	\$10,450.00	\$8,500.00			\$18,950.00
US Bank Mastercard Acct Ending 6980	\$11,704.00	\$6,147.90			\$17,851.90
Wells Fargo Acct Ending 1976		\$7,970.00	\$7,270.00		\$15,240.00
Western National - Rent		\$20,391.77	\$32,172.73		\$52,564.50
Citi Costco Visa Ending 2376 - Stone	\$3,975.84	\$6,265.12	\$13,559.12		\$23,800.08
Stephen Beal - Chase Ending 5309		\$7,550.00	\$250.00	\$177.53	\$7,977.53
Union Acct Ending 7828		\$6,000.00			\$6,000.00
Wells Fargo Acct Ending 1976		\$1,550.00	\$250.00		\$1,800.00
Cash - Valerie Stone				\$177.53	\$177.53
Grand Total	\$26,129.84	\$56,824.79	\$53,251.85	\$177.53	\$136,384.01

Items of Interest:

Funds Received from Beal:	\$	136,384.01
Potential Cash/ATM from Beal: (Orange Tab)	\$	23,599.60
	\$	159,983.61

EXHIBIT H

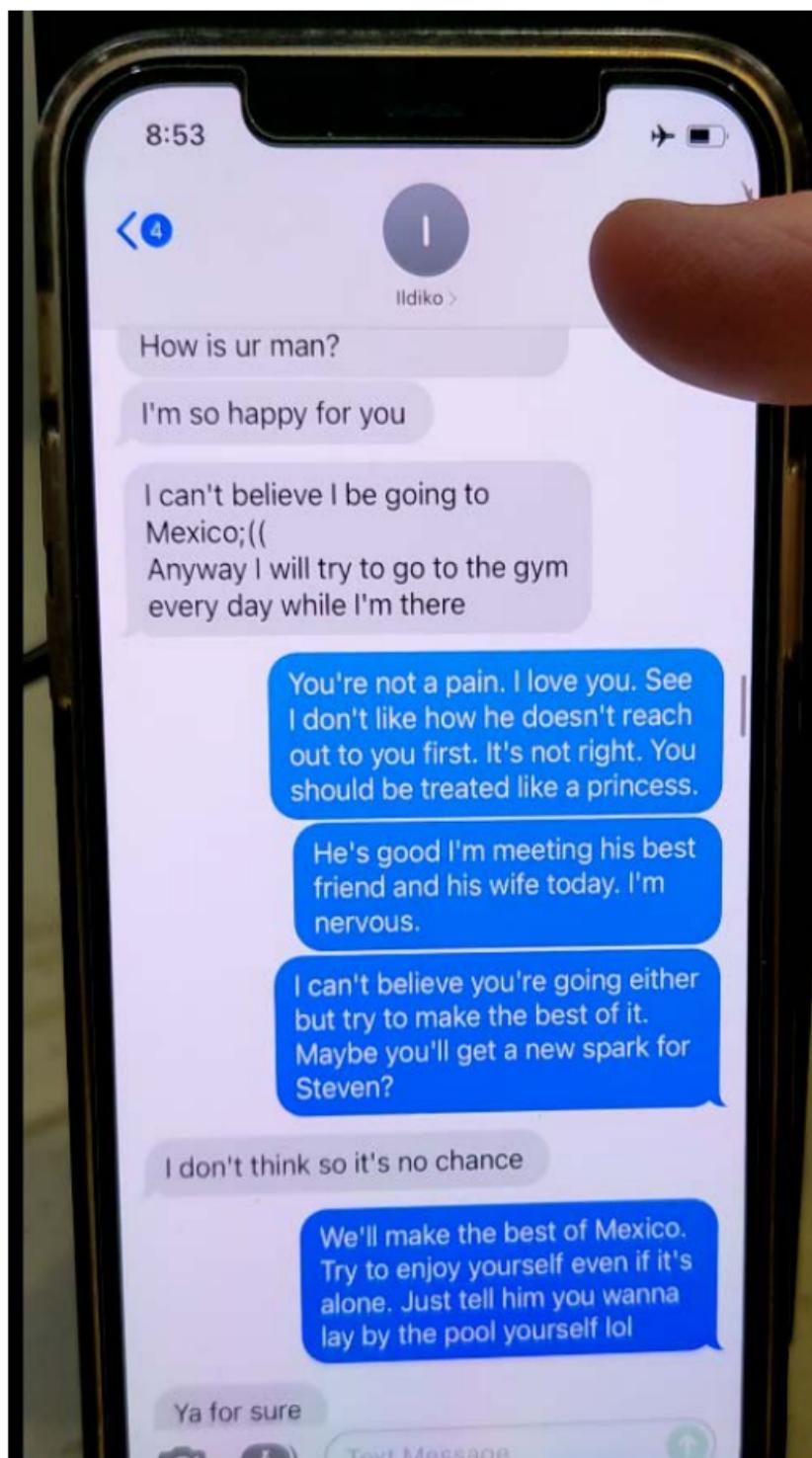


EXHIBIT I



EXHIBIT J

Anna Guan

Case No: 0973 8:19CR00047-001

Defendant: Stephen Beal

Our Claim Number: 3010826880

Our Insured: Jack R. Barnes

Hello,

Here is our information for restitution:

Building: \$1,755,535.33

Business Income: \$337,628.45

Deductible paid by insured: \$8,106.60

Total amount paid: \$2,101,270.38

I have attached the documents that support what we have paid out.

Payment may be sent to:

PO Box 268992

Oklahoma City, OK 73126

Please reference claim number 3010826880 on all payments

Thank you,

Jennifer Sebby

Truck Insurance Exchange

616-977-5893



Toll Free: (800) 435-7764
Email: myclaim@farmersinsurance.com
National Document Center
P.O. Box 268994
Oklahoma City, OK 73126-8994
Fax: (877) 217-1389

October 17, 2019

BARNES, JACK R.
28062 TEFIR
MISSION VIEJO CA 92692-1300
Delivered by email to: jrb sport@att.net

RE:	Insured:	Barnes, Jack R.
	Claim Unit Number:	3010826880-1-3
	Policy Number:	0606617769
	Loss Date:	05/15/2018
	Location of Loss:	11 Mareblu, Aliso Viejo, CA
	Subject:	Important Claim Information

Dear Mr. Barnes:

Thank you for choosing us to provide for your insurance needs. We value you as a customer and appreciate the opportunity to be of service.

Enclosed, please find the updated loss of rents worksheet for the rental period through November 14, 2019. Please be advised that the loss of rents coverage is limited to 18 months or the actual period of restoration to put the property back to its pre-loss condition, whichever comes first.

A payment for the loss of rents is being sent to you electronically, please allow up to 48 hours for it to arrive in your account that you have on file with us. This will be the final loss of rents payment since we have reached the 18 month policy limit.

We encourage you to visit www.farmers.com to learn more about our self-service options available to you, including the ability to view your claim status, upload documents and photos and find local service providers.

If you have any questions, please call me at (858) 342-6465.

Thank you.

Truck Insurance Exchange

A handwritten signature in black ink, appearing to read "Daniel Gil".

Daniel Gil
Special Commercial Property General Adjuster
dan.gil@farmersinsurance.com
(858) 342-6465

CC: JAMES TUCKER

Enclosure(s):

General Supporting Documents -



Toll Free: (800) 435-7764
Email: myclaim@farmersinsurance.com
National Document Center
P.O. Box 268994
Oklahoma City, OK 73126-8994
Fax: (877) 217-1389

February 11, 2020

BARNES, JACK R.
28062 TEFIR
MISSION VIEJO CA 92692-1300
Delivered by email to: jrbsport@att.net

RE:	Insured:	Barnes, Jack R.
	Claim Unit Number:	3010826880-1-1
	Policy Number:	0606617769
	Loss Date:	05/15/2018
	Location of Loss:	11 Mareblu, Aliso Viejo, CA
	Subject:	Settlement Notice

Dear Mr. Barnes:

Thank you for choosing us to provide for your insurance needs. We value you as a customer and appreciate the opportunity to be of service. We deposited your claim payment to the account you registered while enrolling for direct deposit. Funds are generally available within 48 hours.

As discussed, all or a portion of the Building Ordinance or Law - B&C Combined loss has exceeded the policy limit(s) of \$78,000. The excess loss amount beyond the available coverage limit is \$1,893.40. Be advised that this excess loss amount has been used to partially absorb your \$10,000 deductible. The deductible has been reduced to \$8,106.60

A payment of \$359,576.98 is being issued to you at this time. This amount includes the following:

1. I have previously emailed you the estimate for Supplement #2 in the amount of \$217,396.37 which includes the break down for the Building Ordinance (code improvement) repairs.
2. The final misc. repairs and cost items agreed to and itemized on the Statement of Loss totalling \$46,573.70.
3. The recoverable depreciation amount of \$95,606.91.

The attached Statement of Loss worksheet explains your settlement in more detail.

We intend to pursue reimbursement of amounts we paid, including your deductible, if applicable, from the responsible party who caused or contributed to this loss. If we receive payment, we will reimburse your deductible, if one was applied, according to your state's law.

We wish to inform you there are time limits as found in the Conditions language of your policy. These limits may have been extended by statute in your state. The time period set forth in the Conditions section is the shortest period which may apply.

E. Property Loss Conditions

4. Legal Action Against Us

No one may bring a legal action against us under this insurance unless:

- a. There has been full compliance with all of the terms of this insurance; and
- b. The action is brought within 2 years after the date on which the direct physical loss or damage occurred.

Please note, on occasion, policies are updated with newer editions. We encourage you to reference your policy and included endorsements for any updates.

It is our goal to provide our customers with the best possible service. If you have any questions about the claim, please do not hesitate to contact me directly at my primary phone number (858) 342-6465. Although not my main office number, in case of immediate need an alternative number for our claims office is (866) 850-6372.

Thank you.

Truck Insurance Exchange



Daniel Gil
Special Commercial Property General Adjuster
dan.gil@farmersinsurance.com
(858) 342-6465

CC: JAMES TUCKER

Enclosure(s):

General Supporting Documents -



Claim #: 3010826880
Insured: Barnes
GA: Daniel Gil
DOL: 5/15/2018

Tuesday, February 11, 2020

Truck Insurance Exchange

BUILDING COVERAGE **BUILDING STATEMENT OF LOSS**

Description of Building Damage:	Policy limit:	\$2,049,400.00
Locksmith - Martin Lock & Safe inv # 84969		\$522.80
Security 5/25 - 6/2 and General Repairs		\$7,679.42
HVAC Service Call 6/6/18 - Ron's HVAC		\$381.00
Security 6/3 - 6/9 and General Repairs		\$5,460.00
Temp Fence and Emerg Svcs - City of A. V.		\$25,145.00
HVAC Service Call 6/8/18 - Ron's HVAC		\$155.00
Security camera wiring and repair - CTS		\$5,620.75
Elev ator service call and repair - KONE		\$3,048.50
Security 6/10 - 6/16 and General Repairs		\$5,460.00
Debris Removal Dumpster Fee - City of A. V.		\$1,963.52
Security 6/17 - 6/23 and General Repairs		\$5,460.00
Security camera wiring and repair 2 - CTS		\$6,234.50
Debris Removal Fee - Rogelio Sanchez		\$1,850.00
Elev ator service call and phone repair - KONE		\$786.04
Cleaning Fee - Team One Mgmt invoice 152-X		\$550.00
Carpet Cleaning - Team One Mgmt		\$300.00
Elev ator Phone Replacement - KONE		\$990.00
Emergency Services - ACI		\$28,476.66
Building Repair Estimate		\$926,486.57
MEP Engineering Services - SAMS Engineering		\$16,800.00
DVR, Modem, DSL and Camera repairs - CTS		\$1,395.00
HVAC air purifier replacement - Ron's HVAC		\$5,160.00
Fire sprinkler emerg repair - FAST		\$728.96
Fire sprinkler emerg service call - FAST		\$456.07
HVAC service call - Ron's HVAC		\$155.00
Structural Engineering - Hansen Engineering		\$30,723.34
Structural Eng. Plan Check - Hansen Eng.		\$3,142.65
Sprinkler Repair invoice - Sanchez Gardening		\$980.00
Main water line repair - MMS		\$755.00
Water line repair - MMS		\$155.00
HVAC Economizer (2) - Ron's HVAC		\$2,300.00
Locksmith at Bathrooms - Martin Lock		\$188.40
Sprinkler Repair 2 invoice - Sanchez Gardening		\$3,080.00
Irrigation Repairs - Sanchez Gardening		\$3,080.00
Carpet Cleaning - Team One Mgmt inv. #156		\$280.00
Sprinkler/irrigation Repairs - Sanchez Gard.		\$3,050.00
Security camera wiring - CTS invoice 3893		\$1,490.00
Building Repair Supplement - ACI Const.		\$347,907.33

	Date of Payment	Amount of Payment
<Less prior pay ments:>	6/4/2018	\$8,202.22
<Less prior pay ments:>	6/11/2018	\$5,841.00
<Less prior pay ments:>	6/18/2018	\$39,429.25
<Less prior pay ments:>	6/19/2018	\$1,963.52
<Less prior pay ments:>	6/29/2018	\$11,694.50
<Less prior pay ments:>	7/5/2018	\$2,636.04
<Less prior pay ments:>	7/17/2018	\$1,840.00
<Less prior pay ments:>	Paid to ACI	\$28,476.66
<Less prior pay ments:>	7/24/2018	\$820,879.66
<Less prior pay ments:>	Paid to SAMS Eng	\$16,800.00
<Less prior pay ments:>	7/26/2018	\$7,740.03
<Less prior pay ments:>	8/1/2018	\$155.00
<Less prior pay ments:>	Paid to Hansen Eng	\$30,723.34
<Less prior pay ments:>	Paid to Hansen Eng	\$3,142.65
<Less prior pay ments:>	9/27/2018	\$1,890.00
<Less prior pay ments:>	10/26/2018	\$2,488.40
<Less prior pay ments:>	11/29/2018	\$3,080.00
<Less prior pay ments:>	2/26/2019	\$3,360.00
<Less prior pay ments:>	5/9/2019	\$4,640.00
<Less prior pay ments:>	5/20/2019	\$400,976.08
<Less prior pay ments:>		
<Less prior pay ments:>		
This Payment:		\$359,576.98