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FILED  
SEP 14 2015  
CLERK OF THE SUPERIOR COURT  
COUNTY OF STANISLAUS  
BY  DEPUTY

14 SUPERIOR COURT OF CALIFORNIA  
15 COUNTY OF STANISLAUS

16 PEOPLE OF THE STATE OF CALIFORNIA, Case No. 1490969

17 Plaintiff,  
18 vs.  
19 GEORGIA DEFILIPPO,  
20 Defendant.

DECLARATION OF STEPHEN KRIMEL  
IN SUPPORT OF GEORGIA  
CARSON'S REQUEST FOR OR  
RELEASE OR A BAIL REDUCTION  
Date: September 14, 2015  
Time: 10:00 a.m.  
Dept: 8

21 I, STEPHEN B. KRIMEL, under penalty of perjury, do hereby  
22 state, declare and swear that if called as a witness in this  
23 matter, my testimony would be in accord with the following, and  
24 that these matters stated herein are true and correct of my own  
25 knowledge except as to those matters stated on information and  
26 belief, and as to those matters, I believe them to be true.

27 1. Attached hereto and incorporated herein by this  
28 reference is a copy of my Curriculum Vitae, which requires only

1 several updates, as follows:

2 a. My certification by the State Bar as a Criminal  
3 Law Specialist spanned twenty (20) years from 1993-2013). I  
4 did not apply for recertification in September 2013;

5 b. In 2005 I acquired the two largest bail bond  
6 agencies in northern Nevada (Action and Annie's) through my  
7 wholly owned Nevada Corporation Action Annie's, Inc. These  
8 agencies conduct flight risk assessments on approximately  
9 1,800 persons per annum, and issue approximately 1,200 bail  
10 bonds for criminally accused persons. All bail bonds  
11 exceeding \$25,000 are personally reviewed/approved by me in  
12 the normal course of doing business.

13 c. I am currently the President of the Nevada Bail  
14 Agents' Association, founded in 1992, which is the state  
15 trade association for the Nevada bail bond industry. I hold  
16 a Bail Agent's license issued by the State of Nevada.

17 d. In the Stanislaus County Superior Court Case No.  
18 1436501, People v. A. J. Pontillo, in January 2013  
19 (preliminary hearing, five days on the stand) and July to  
20 December 2014 (jury trial - acquittal of all charges), Judge  
21 Stefan qualified me as an expert on bail law and bail  
22 practices (see PXT Vol. 3, p. 1233 for example). I  
23 testified for several days before the jury of A. J.  
24 Pontillo, who was represented by Frank Carson, Esq.

25 e. I was first found to be an expert witness on § 187  
26 P.C. bail amount and flight risk assessment in 1998 in  
27  
28

1 Riverside County, People v. Michael Lanning.

2 2. In preparing this declaration and for sworn testimony,  
3 I met with and interviewed Georgia Carson, her daughters and  
4 husband, office staff, friends and others who know her in an  
5 effort to confirm information about her that I received from her  
6 file, documents and public records. I believe, therefore, that  
7 my opinions are based on sound facts and logical conclusions  
8 premised upon the facts of this case viewed without bias. While  
9 I have known Georgia Carson for several years, I do not believe  
10 that relationship will cause bias on my part. I will have no  
11 involvement in, or financial interest in any bail bond the court  
12 orders.

13 3. I have reviewed the booking and bail information on  
14 inmates in the Stanislaus County Jail (hundreds) and the bail  
15 schedules for Los Angeles County and Sonoma County re bails set  
16 on § 187 P.C. (Murder) defendants in preparing this evaluation.  
17 I have also read in detail the 326 page arrest affidavit, the  
18 search warrant and affidavit, and the opposition to bail and 12  
19 page affidavit of D.A. Investigator Kirk Bunch in support  
20 thereof.

21 In the course of my jail record review of § 187 P.C.  
22 detainees in Stanislaus County, I randomly selected thirty cases  
23 in which, as here, bail had been set. The results of that review  
24 are accurately set forth in the memorandum of law filed herewith.  
25 The results were:

	<u>AMOUNT</u>	<u>NUMBER OF DEFENDANTS</u>
1		
2	\$10,000,000	3
3	5,000,000	2
4	4,000,000	1
5	2,000,000	16
6	1,250,000	4
7	1,000,000	4

8 All of the above materials and others appearing in Georgia  
9 Carson's Motion to Recuse the Stanislaus County D.A.'s Office,  
10 incorporated herein by this reference, I believe support by  
11 following opinions and conclusions:

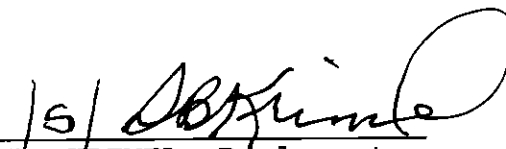
12 a. There exists a severe, ongoing feud between Frank  
13 Carson and certain personnel in the Stanislaus County  
14 District Attorney's office which underlies the pursuit and  
15 overcharging of Georgia Carson; nothing I have read or seen  
16 supports a first degree murder charge or a "lying in wait"  
17 special circumstance allegation against her. I believe this  
18 overcharging was intentional, in part to make it more  
19 difficult for Mrs. Carson to make bail and to ultimately  
20 consume her assets on bail premium charges instead of being  
21 able to compensate her defense counsel and ancillary defense  
22 serves. I am unable to reconcile her status with any other  
23 explanation.

24 b. Georgia Carson is an ideal candidate for an OR  
25 release...never before arrested in her 64 years, 62 of which  
26 have been in Modesto. Her entire family and life is here,  
27

1 and she poses no risk of flight. An OR release is within  
2 the Court's discretion.

3 c. If bail is required, it is my opinion the sum of  
4 \$500,000 is sufficient to guarantee her appearance and  
5 compel her family to assist in indemnifying and obtaining  
6 her bail.

7 Executed this 14<sup>th</sup> day of September, 2015, at Modesto,  
8 California.

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12 STEPHEN E. KRIMEL, Declarant  
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