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File No. 942.27

October 10, 2019

Via U.S. MAIL ONLY

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Re: Gabrielino-Tongva Tribe v. SMDC, Jonathan Stein, et al

LASC Case No. BC 361307 / Honorable Y. Palazuelos, Dept. 9, Spring St. Ct.house

Dear Addresses:

We are writing to inform you that our client, the Gabrielino-Tongva Tribe (a group which is currently led by Sandonne Goad, and was previously led by Virginia Carmelo) recently prevailed in long-standing litigation against Jonathan Stein ("Stein"), Law Offices of Jonathan Stein ("LOJS"), and Stein's alter-ego, St. Monica Development Co. LLC ("SMDC") (collectively Stein, LOJS and SMDC are referred to as "Stein Defendants"). The Statement of Decision, and the Judgment were finalized on August 27, 2019, and included an award of \$20,411,067.23 in damages and an additional \$7,000,000 in punitive damages.

We were recently informed that the group of Tongva people whom you purport to represent is planning on using confidential documents which belong to our client, the Gabrielino-Tongva Tribe, a group which is currently led by Sandonne Goad, and was previously led by Virginia Carmelo and representing those documents as belonging to your group. We are informed that your group came into possession of those documents when Jonathan Stein tendered them to your group for your use.

As noted above, the Statement of Decision became final on August 27, 2019 and specifically orders that any documents be returned to our client. The Statement of Decision is binding on Jonathan Stein and everybody affiliated with him specifically orders that the documents which belong to the Gabrielino-Tongva Tribe and were retained by Stein when this dispute arose in Fall of 2006 be returned to our client. The Statement of Decision also enjoins your group from holding itself out to be the Gabrielino-Tongva Tribe. The Order specifically ORDERS Defendant Jonathan Stein and all of his related entities to

- "1) Deliver to the Tribe all of the Tribe's information in documentary or electronic form, or any other form, including but not limited to any all originals and copies of the Tribe's membership records and financial records;
- "2) Deliver to the Tribe all of the Tribe's computers, disks, and electronic equipment in the form and condition in which they were taken from the Tribe;
- "3) Deliver all of the above within 30 days of the service of this Judgment."

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See Statement of Decision (Case No. BC 361307) P. 84, Lines 8 – 15.

We have included a copy of the voluminous statement of decision and judgment to this mailing so that you can review it and understand the gravity of the claims alleged against Mr. Stein. Some of you were witnesses for Mr. Stein during his trial. Significantly, you were aware that this action was on-going, and you should have been kept appraised of the serious nature of the order issued by the Court, in which Mr. Stein was found liable for fraud, and lost all of his claims. He was also found to not have a legal basis for retaining possession of the Gabrielino-Tongva Tribe's documents and thus had no legal basis for tendering them to you. You were named as the party that now has possession of these documents during testimony. You have no legal basis for retaining custody of these documents and not complying with the court order to return them to the lawful owners who are the Gabrielino-Tongva Tribe led by Sandonne Goad and previously Virginia Carmelo. We respectfully request that any documents in your possession be tendered to the custody of our clients, pursuant to the Court Orders embodied by the Statement of Decision and Judgment and that you refrain from representing to anybody that these documents are lawfully in your possession as it is our contention that you have no right to retain custody of them.

Nothing in this letter should be interpreted as waiving any rights or remedies available under law -- all of which are expressly reserved.

Sincerely,

Jamie E. Wright, Esq.