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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 KRISTY LYNN FELKINS,
15 Defendant.

CASE NO. 2:20-CR-00175 TLN
STIPULATION TO FACTUAL BASIS FOR
GUILTY PLEA

16
17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
19 through defendant's counsel of record, hereby stipulate as to the following facts in relation to admissions
20 by the defendant relating to her guilty plea on March 17, 2022. The parties stipulate that the defendant
21 reviewed and admitted to the following factual basis:

22 1. On or about February 26, 2016, defendant KRISTY LYNN FELKINS created an account
23 on the website Besa Mafia, which purported to offer a variety of illegal services, including murder,
24 kidnapping, and assault, in exchange for cryptocurrency payments. Besa Mafia operated as a "hidden
25 service" on the Tor network, which is known as the "dark web." At least with regard to FELKINS, Besa
26 Mafia was actually a scam website that took users' money but never carried out the offered services.

27 2. FELKINS communicated with a Besa Mafia representative ("Besa Admin") regarding:
28 (1) whether the site was truly offering hitman services, (2) how to avoid detection by law enforcement,

1 and (3) how to securely purchase and transmit Bitcoin payments.

2 3. Between approximately March 6, 2016, and March 9, 2016, FELKINS sent Besa Mafia
3 just over twelve Bitcoin, the value of which was approximately \$5,000 at the time, for a hitman to kill
4 VICTIM-1 and make it look like an accident. FELKINS provided the home address of VICTIM-1 and
5 other information such as the time he left for work, vehicle information, and locations at which
6 VICTIM-1 could be located. After receiving Bitcoin from FELKINS (who was operating under a
7 moniker), a Besa Admin acknowledged receipt of the payment and told FELKINS that a nearby hitman
8 would be assigned to the job.

9 4. In the weeks following, FELKINS and Besa Admin had numerous exchanges confirming
10 that FELKINS intended that the Besa Admin follow through on his/her agreement to kill VICTIM-1.
11 For instance, in one communication, FELKINS asked Besa Admin: if it was “possible to make it seem
12 like it was a mugging gone wrong? Maybe they take his wallet? I understand if that means it might not
13 happen on Monday am, but may take an extra day or so to plan. If this isn’t possible I understand.” Besa
14 Admin responded that it would be possible to make it look like an accident, but it would cost an
15 additional \$4,000. FELKINS instructed Besa Admin to proceed as previously planned.

16 5. FELKINS also provided Besa Admin with VICTIM-1’s home address and travel plans.
17 FELKINS further explained that she wished VICTIM-1 dead because she did not want him to have
18 custody of her children, and also that she was likely to receive his retirement, their house, and a large
19 life insurance payout after his death. FELKINS also told Besa Admin that she did not care if his
20 girlfriend was harmed during the murder, and that she would pay an extra \$4,000 if VICTIM-1 was
21 killed the day after that communication—March 23, 2016—but “I really need it done no later than this
22 coming Friday.”

23 6. During the course of their communications, Besa Admin offered various excuses as to
24 why VICTIM-1 had not been killed. FELKINS continued to provide VICTIM-1’s location information,
25 requests to complete the job, and general instructions specific to the death of VICTIM-1.

26 7. FELKINS began to become suspicious that Besa Admin would not perform the murder as
27 promised around April of 2016. After Besa Admin failed to provide a credible photo of the supposed
28 hitman’s location (purportedly North Carolina, where VICTIM-1 was then located), FELKINS stopped

1 communication on or about April 19, 2016.

2 8. VICTIM-1 was not harmed or contacted by representatives of Besa Mafia.

3 9. FELKINS admits that she used the internet, a facility in interstate and foreign commerce,
4 to hire someone to murder VICTIM-1. She further admits that she communicated with a representative
5 of the group calling itself Besa Mafia with the intent of causing the murder of VICTIM-1. FELKINS
6 also admits that she sent a representative approximately twelve Bitcoin in exchange for the act of
7 murdering VICTIM-1.

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9 IT IS SO STIPULATED.

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11 Dated: March 17, 2022

PHILLIP A. TALBERT
United States Attorney

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13
14 /s/ PAUL HEMESATH
PAUL HEMESATH
Assistant United States Attorney

15
16 Dated: March 17, 2022

/s/ LINDA C. ALLISON
LINDA C. ALLISON
Counsel for Defendant
KRISTY LYNN FELKINS