

IN THE SUPREME COURT OF THE STATE OF NEVADA

TULY LEPOLO,
aka TAUTAMUA LEPOLO,
aka TUTAUMUA LEPOLO,

Petitioner,

vs.

THE EIGHTH JUDICIAL DISTRICT
COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF
CLARK; THE HONORABLE MICHAEL
VILLANI, DISTRICT JUDGE; AND THE
HONORABLE DAVID BARKER,
SENIOR DISTRICT COURT JUDGE,

Respondents,

STATE OF NEVADA,

Real Party in Interest.

Electronically Filed
Feb 08 2022 10:16 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 83755

RESPONDENT'S APPENDIX

W. JEREMY STORMS
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INDEX

<u>Document</u>	<u>Page No.</u>
Amended Criminal Complaint, filed 01/06/20	10-11
Arrest Warrant, dated 08/05/19.....	14
Criminal Complaint, filed 08/05/19	10
Justice Court Minutes of 10/28/19 (Arrest Warrant Return)	13
Justice Court Minutes of 01/06/20 (Preliminary Hearing)	12
LVMPD Declaration of Warrant/Summons, filed 08/05/19.....	1-9

CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on February 8, 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD
Nevada Attorney General

W. JEREMY STORMS
Chief Deputy Special Public Defender

JOHN AFSHAR
Deputy District Attorney

I, further certify that on February 8, 2022, a copy was sent via email to:

District Court, Department 17's JEA for Judge Villani:

Olivia Black – JEA
BlackO@ClarkCountyCourts.us

District Court, Senior Judges JEA for Judge Barker:

Ileen Spoor – JEA
SpoorI@ClarkCountyCourts.us

BY /s/ J. Hall
Employee, District Attorney's Office

JA/Suzanne Rorhus/jh

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
DECLARATION OF WARRANT/SUMMONS
(N.R.S. 171.106)
(N.R.S. 53 amended 7/13/1993)

FILED

2018 AUG 5 AM 11:31
Event Number: 3160403-3524

STATE OF NEVADA) Henry Taylor
) ss: DOB: [REDACTED]
COUNTY OF CLARK) LVMPD ID# 1884899

JUSTICE COURT
LAS VEGAS, NEVADA
GMR
DEPUTY

Robert Ochsenhirt, being first duly sworn, deposes and says:

That he is a detective with the Las Vegas Metropolitan Police Department, being so employed for a period of over 22 years, assigned to investigate the crime(s) of Murder with a Deadly Weapon committed on or about April 03, 2016, which investigation has developed Henry Taylor as the perpetrator thereof.

THAT DECLARANT DEVELOPED THE FOLLOWING FACTS IN THE COURSE OF THE INVESTIGATION OF SAID CRIME, TO WIT:

On 04-03-16 at approximately 2057 hours, LVMPD patrol officers responded to the call of a shooting at [REDACTED]. Patrol officers arrived on the crime scene and located a black female adult lying on the ground between buildings 25 and 26. The female was ultimately identified as Raquel Stapinski. Stapinski appeared to have suffered multiple gunshot wounds to the right side of her body. Medical personnel arrived and pronounced Stapinski deceased at the crime scene. Homicide detectives were contacted and responded to the crime scene to conduct the follow-up investigation.

The follow-up investigation revealed there had been two parties within the apartment complex that night. Dana [REDACTED] hosted one party in building 25, at apartment [REDACTED] and Elaine [REDACTED] hosted another party in building 26, at apartment [REDACTED]. Numerous people attended each party.

During the parties, Dana [REDACTED] son, Dwayne "Wayne Wayne" [REDACTED] wanted to fight a subject from [REDACTED] party. Several people associated with the two parties began to argue and fight with one another in the parking lot north of the two apartment buildings.

The matriarchs from each respective party, Dana [REDACTED] and Elaine [REDACTED] became involved in the fight. During the fight, Dana [REDACTED] brother Henry "T-Loc" Taylor fired a single shot from a 9mm semi-automatic handgun in the parking lot. The fight broke up and people made their way back to their respective apartments.

CONTINUATION

Event #: 160403-3524

Witness Courtney [REDACTED] was interviewed and related the following: Courtney was in her upstairs apartment, which looked down over the complex parking lot. Throughout the day people gathered in the parking lot from two parties in the complex. A fight ultimately broke out in the parking lot between two male subjects. She looked out her sliding glass door, but could not see the subjects very well, but believed the males fighting were black. Courtney turned to go back to her living room, when she heard a single gunshot. She looked back outside and saw people had started to disperse. She grabbed her cellular telephone and called 9-1-1. She was on the phone with 9-1-1 and watched a male go into a white Chevrolet Suburban with California license plates and retrieve a black handgun. The male walked toward the area of apartment [REDACTED] and fired approximately nine (9) times at the people standing in the hallway in front of [REDACTED]. After the shooting, the suspect fled on foot (east) between the buildings toward Torrey Pines. Courtney described the shooting suspect as approximately 30 years old, possibly African American, approximately 6'0" tall, 200 pounds, last seen wearing a white t-shirt and basketball shorts.

Homicide Detective Sanborn identified the white Chevrolet Suburban as having California license plate [REDACTED]. The vehicle was parked under covered parking north of the shooting scene. A California Department of Motor Vehicles records check revealed the Suburban was registered to Elise [REDACTED] at [REDACTED]. The Suburban was photographed and sealed at the crime scene in preparation to be towed to the crime lab for further forensic processing.

Witness Stanley [REDACTED] was interviewed and related the following: Stanley arrived in Las Vegas on Friday (April 1st) to celebrate a family member's birthday. He stayed at [REDACTED] apartment [REDACTED] which belonged to his aunt, Elaine [REDACTED]. On Sunday night (April 3rd) Stanley wanted to go out with his sister, Kaloni [REDACTED] however, while waiting for her to arrive, he fell asleep. Stanley later awoke to the sound of an argument outside of the apartment. Stanley exited the apartment and saw several family members standing near the carport area. The family members were arguing with other subjects who were known to his family. Approximately 20 people were involved in the argument. Stanley walked up to the crowd of people, and an unknown black male produced a handgun. Stanley then heard four gunshots, ducked down, and ran to apartment [REDACTED] with several other family members. The male with the gun was black, in his late 20-30s, with short hair a muscular build and appeared to be intoxicated. The male was wearing all black clothing and he was armed with a handgun. Stanley insisted his cousin's baby's daddy "Antoine" could identify the shooter.

Witness Gordon [REDACTED] was interviewed and related the following: Gordon came to Las Vegas to visit family. He stayed at [REDACTED] apartment [REDACTED] which belonged to his aunt, Elaine [REDACTED]. On Sunday night (April 3rd) Gordon was preparing to go out with other family members. He and several other family members exited the apartment. Several of his family members began to argue with other people, who apparently knew his family. A black male he knew as Wayne Wayne wanted to fight his cousin. Wayne Wayne's mom (Dana [REDACTED]) jumped into the fight, which caused his Aunt Elaine to get involved.

CONTINUATION

Event #: 160403-3524

Suddenly an individual by the moniker of "T-Loc" produced a handgun and fired. Gordon has known T-Loc for a long time, but did not know his real name. T-Loc lived in the other apartment involved in the incident. Gordon said "Antoine" would know T-Loc's real name. T-Loc was described as a black male, 20-30 years of age, stocky build, with tattoos. T-Loc was wearing a white tee-shirt, black shorts, and a black hat with a "W" on the front. T-Loc was armed with a chrome handgun.

Witness Maleka [REDACTED] related the following: She was inside her apartment [REDACTED] and heard a commotion coming from the parking lot. She went outside to see what was going on and saw a boy being jumped. She was unable to describe the boy who was being jumped, but she believed he was being jumped by approximately five black males. There were approximately 15-20 people out in the parking lot, when 5-6 gunshots went off. She ran back to her apartment and called the police. She denied anyone from her apartment was involved in the fight outside. She recently moved to the complex and did not recognize any of the subjects involved in the fight. She also did not see who was shooting.

During the follow-up investigation, Homicide Detective Sanborn identified Maleka [REDACTED] as Elaine [REDACTED] (NV OLN [REDACTED]). Several witnesses mentioned an "Elaine" as someone who would know the identity of the shooting suspect. Elaine [REDACTED] had falsely identified herself to investigators with an alias of Maleka [REDACTED]. [REDACTED] denied she or any of her family was involved in the fight or shooting. The follow-up investigation revealed the suspect in the shooting was related to Elaine [REDACTED] and she appeared to investigators to be protecting the suspect and not assisting investigators with the investigation.

Witness Dana [REDACTED] related the following: Dana lived in apartment [REDACTED] and was having a birthday get together and BBQ. She went outside because of a commotion and saw several people in the parking lot fighting. She was on the walkway and heard gunshots. She turned to run and thought her friend Raquel was right behind her. She did not know how Raquel got shot. She did not see who was shooting but thought there was more than one person shooting. She was drunk and heard someone yell out to pick up the bullets, so she started to pick up bullets from outside her front door, when police officers arrived and detained her. She did not see anyone shooting from her front door area.

It was apparent from the evidence at the crime scene, the second person shooting (Henry Taylor) at the crime scene retrieved the 9mm handgun from Dana [REDACTED] apartment, from a back pack in her son Dwayne [REDACTED] bedroom. Witnesses identified Dwayne "Wayne Wayne" [REDACTED] as being involved in the original fight; however, he fled before police arrived.

It was apparent to investigators Dana [REDACTED] knew the identity of the persons involved in the shooting; however, she did not want to assist investigators and she appeared to be protecting the person(s) involved in the shooting.

CONTINUATION

Event #: 160403-3524

Witness Flora [REDACTED] related the following: Flora came to apartment [REDACTED] to visit with family. She was doing hair inside the apartment when she decided to have her sister-in-law take over. Flora left the apartment and spoke on her cellular telephone as she walked to the east end of the complex. She heard several gunshots and ran back to the apartment. Flora did not see the shooting, but the person she believed was the shooter ran past her on the sidewalk just south of building 25. Flora described the shooter as have a mixed race, possibly black and Hispanic male, approximately 5'8", and a medium build. He was wearing a white tee shirt and black or blue colored shorts. Flora could not name the shooter, but said she had seen him before. Flora later learned her friend, Raquel, was killed during the shooting. Flora said she did not know the identity of the shooter.

Prior to the interview, Flora was approached by Stanley and Gordon [REDACTED] who both gave her a hug. She knew the men as "Bill" (Stanley) and "Wally" (Gordon), and knew they were from California. Apparently they were known to her sister's family in apartment [REDACTED]. Flora knew the people living in apartment [REDACTED] specifically "Miss Elaine" could identify the shooter.

Witness Tavon [REDACTED] related the following: Tavon lived in apartment [REDACTED], which was just north of apartment [REDACTED]. He was in the kitchen between 2030-2100 hours, when he heard a single gunshot, followed by a lot of footsteps running by his front door. Tavon heard a little girl's voice tell her mom someone had been shot. Tavon went to his bedroom window and looked outside and saw a male walk up from the parking lot area. The male got to the sidewalk and started running up to the group, and yelled, "What's up now, you bitch ass nigger?" and fired 5-6 shots toward the group. Tavon ducked down as several bullets went into his apartment. Tavon described the shooting suspect as an approximately 35-40 year old Samoan or Hawaiian male. The male was approximately 6' tall, with shoulder length black hair, tattoos on both arms, and a stocky build. The male was wearing a white short sleeved shirt with a blue Washington Nationals logo on it, blue shoes, blue L.A. baseball hat, and possibly jeans.

After several hours at the crime scene, a tow truck arrived to tow the white Chevrolet Suburban (CA [REDACTED]) to the LVMPD Crime Lab for further forensic processing. The arrival of the tow truck caused the registered owner Elise [REDACTED] to exit apartment [REDACTED] and make contact with investigators.

Witness Elise [REDACTED] related the following: [REDACTED] came to Las Vegas with her six children for a birthday party. She drove to Las Vegas with only her children in her white Chevrolet Suburban (CA [REDACTED]) and arrived at her in-laws' apartment on Friday April 1, 2016. She had been staying at her in-laws' apartment (Building 25, Apartment [REDACTED]) since Friday. On the night of the shooting she was inside the apartment and did not see anything. She denied anyone would have retrieved a gun from her vehicle and said the keys were with her the entire night. [REDACTED] did not assist investigators and continued to deny anyone could have retrieved a gun from her vehicle.

Crime scene analysts and homicide detectives examined the crime scene for evidence. Investigators recovered one (1) 9mm cartridge case from the parking lot area where the original fight took place. Five (5) .40 S&W cartridge cases were recovered on the ground east of the alcove for apartment [REDACTED]. Four (4) additional 9mm cartridge cases were recovered on the ground in the alcove for apartment [REDACTED].

CONTINUATION

Event #: 160403-3524

Crime scene analysts and homicide detectives examined the apparent bullet path trajectories and determined the African American suspect was firing a 9mm handgun in an easterly direction from the entryway alcove of apartment [REDACTED] while the Samoan suspect was firing a .40 caliber handgun in a westerly direction toward the entryway alcove of apartment [REDACTED]. The victim, Raquel Stapinski, was caught in the cross fire and was struck several times by the Samoan suspect.

Investigators observed several areas of apparent blood along the south side of building 25, where the Samoan suspect fled on foot. The areas of blood continued east along the building, then north to the parking lot, where no additional areas of blood could be located. Crime scene analysts recovered four (4) swabs of the apparent blood on the south side of building 25.

It appeared to investigators the shooting suspect from the Samoan party made his way east along the building, stopping twice in two different apartment alcoves, before making his way to the parking lot and fleeing the scene. It was unknown if the suspect was injured during the initial fight in the parking lot or wounded during the subsequent shooting.

During the processing of the crime scene, investigators obtained a search warrant for apartment [REDACTED]. A bedroom was located in the southeast corner of the residence. State of Nevada Welfare Department paperwork and a Social Security Card both in the name of Dwayne [REDACTED] were located in the top drawer of a dresser. A black backpack was located on the floor, west of the bed. Three (3) cartridges were on the floor, north of the backpack. A "Winchester 9MM" ammunition box, containing "WIN 9MM LUGER" cartridges and loose ammunition were within the backpack. A pair of black pants was on the floor, north of the backpack. A wallet was attached to the pants with a chain and contained a Southern Nevada Health District ID card in the name of Dwayne [REDACTED].

Dwayne "Wayne Wayne" [REDACTED] the male known as T-Loc, and the unknown Samoan male shooting suspect all fled the crime scene prior to the arrival of police officers.

On 04-05-16, a complete autopsy was performed on the body of Raquel Stapinski at The Clark County Office of the Coroner/Medical Examiner. Doctor Olsen determined Stapinski died as the result of a gunshot wound of the right arm and axilla. The manner of Stapinski's death was ruled a homicide. During the autopsy a bullet was recovered from the left side of Stapinski's chest. The bullet was impounded as evidence by Crime Scene Analyst Lynch.

On 4-05-16, Homicide Detectives Sanborn and Ivie responded to the LVMPD Crime Lab to serve the search warrant on Elise [REDACTED] white 2004 Chevrolet Suburban (CA [REDACTED]). Crime Scene Analysts Fletcher, Grover, and Andrews assisted with the warrant service and conducted the forensic processing. The vehicle was parked in the Crime Lab garage and the seals were intact.

CONTINUATION

Event #: 160403-3524

Crime Scene Analyst Grover conducted the latent print processing on the Suburban and developed numerous latent prints on the exterior of the vehicle as well on various items inside the vehicle.

Crime Scene Analyst Grover also recovered and impounded swabs of possible DNA evidence recovered from the Monster Energy drink can, steering wheel, and shift lever. A search of the vehicle was conducted for firearms related evidence with negative results.

On 05-09-16, Forensic Scientist Angel Moses completed the requested forensic firearms examinations. The evidence bullets were microscopically examined in conjunction with one another. Based on the comparative examinations, Scientist Moses determined two (2) bullets (Items 8 & 36), one recovered from Victim Stapinski's body at autopsy, the other recovered from inside apartment [REDACTED], were fired from a single .40 caliber firearm.

The evidence cartridge cases were microscopically examined in conjunction with one another. Based on the comparative examinations, Scientist Moses determined there were a minimum of two firearms represented by the cartridge cases. The five (5) 9mm Luger cartridge cases had all been fired by a single firearm. The remaining five (5) .40 S&W cartridge cases all bore the same overall characteristics to one another; however, there were insufficient microscopic details for a conclusive identification.

Dwayne [REDACTED] was subsequently contacted and related the following: Dwayne was asleep inside his bedroom when he heard gunshots outside. He checked on his little brother, as people started to come inside his apartment. He fled over the back balcony before police arrived because he had a probation warrant. Dwayne denied he was ever outside during the fight or shooting. He also did not hear anyone come inside his room and get a gun out of a backpack. [REDACTED] also denied knowing anyone with the nickname of T-Loc. He did know who from his apartment was shooting or see who from the other apartment was shooting.

It was apparent to investigators, Dwayne "Wayne Wayne" [REDACTED] was being untruthful and he did not want to assist the investigation.

Homicide Detective Sanborn was ultimately able to identify T-Loc as Henry Taylor.

Henry Taylor was subsequently contacted and related the following: He was Dana [REDACTED] brother, Dwayne [REDACTED] uncle, witness Flora [REDACTED] brother, and Antoine [REDACTED] brother. Taylor denied being present at [REDACTED] birthday party on the night of April 3, 2016, despite having several people identify him by moniker and describe him. Taylor recalled being told about the party and fight incident by family members, but insisted he was not present. Henry's brother Antoine has a baby with a female member of the Samoan family, Cecilia Jackie [REDACTED].

It was apparent to investigators, Henry "T-Loc" Taylor was being untruthful and he did not want to assist the investigation.

CONTINUATION

Event #: 160403-3524

On 09-14-16, Forensic Scientist Heather Gouldthorpe, completed the AFIS (Automated Fingerprint Identification System) search of the selected latent fingerprints recovered during the processing of the Chevrolet Suburban. One suitable print (Q54 B) from the exterior right front door was searched and identified to the right ring finger of Tuly Lepolo (FBI# 95252HA9). One suitable print (Q27) from the Monster Energy drink can was identified to the right thumb of Tuly Lepolo (FBI# 95252HA9). One suitable print (Q68) from the left side of the hood was identified to the left palm of Tuly Lepolo. One suitable print (Q69) from the left side of the hood was identified to the right palm of Tuly Lepolo.

Homicide Detective Sanborn conducted a police records check on Tuly Lepolo, which revealed Tuly was a Samoan male with long black hair and tattoos on both arms, who was also known as Tautamua Lepolo. He was listed between 5'9" – 5'11" inches tall, and weighed between 180-260 pounds. The address listed on Tuly Lepolo's California driver's license was [REDACTED] Department of Corrections records revealed Tuly Lepolo was affiliated with the Hoodlum Crip Boys gang, and had the nickname of Trigger.

The AFIS fingerprint information and the physical descriptors of Tuly "Tutamua" Lepolo, were consistent with the witness information investigators received regarding the suspects actions and physical description.

On 11-03-16, Forensic Scientist Allison Rubino completed the requested Biology/DNA Forensic work. The DNA profile obtained from the swab from the mouth of the Monster Energy can from the center console drink holder of the Chevrolet Suburban was consistent with a distinguishable mixture of at least two individuals, with at least one being a male. The major DNA profile was consistent with a single unknown male individual **Unknown Male #1**. The DNA profile obtained from the swab from the steering wheel and shift lever of the 2004 Suburban was consistent with a distinguishable mixture of at least three individuals, with at least one being a male. The major DNA profile was consistent with **Unknown Male #1**. The full DNA profiles obtained from the apparent suspect blood samples AB1, AB2, AB3, and AB4, were consistent with **Unknown Male #1**.

On 11-22-16, Homicide Detective Sanborn received a CODIS Hit Notification Report from the LVMPD Forensic Lab regarding evidence from event number 160403-3524. During a search of the National DNA Index System (CODIS) database a match occurred between the DNA profile of **Unknown Male #1** obtained from blood sample AB1 to a California Offender. The California DOJ DNA Data Bank Laboratory provided their offender information as: Tuly Lepolo with FBI number 95252HA9.

Homicide Detective Sanborn reached out to San Bernardino County Sheriff's Department (SBCSD) Homicide Detective Jonathan Cahow for assistance with obtaining a search warrant in the State of California for a sample of Tuly Lepolo's DNA. The DNA sample was necessary to complete the forensic comparison to the CODIS Hit Notification Report from the LVMPD Forensic Lab regarding evidence from event number 160403-3524.

CONTINUATION

Event #: 160403-3524

SBCSD Gang Task Force Detectives located Tuly Lepolo living at [REDACTED]. Also located at the residence on California Street was Elise [REDACTED] white Chevrolet Suburban (CA [REDACTED] SBCSD Detectives conducted physical surveillance and noted Tuly Lepolo still had complete access to the white Chevrolet Suburban.

On 04-19-17, SBCSD Gang Task Force Detectives established physical surveillance on the residence at [REDACTED]. At approximately 1415 hours, detectives observed Tuly Lepolo drive away from the residence in [REDACTED] white Chevrolet Suburban. A vehicle stop was conducted and Lepolo was detained. Lepolo was transported to the SBCSD Headquarters building for the service of the search warrant.

SBCSD Homicide Detective Cahow provided Lepolo with a copy of the search warrant prior to recovering a sample of Lepolo's DNA, via the application of a Buccal Swab Kit. The Buccal Swab kit was subsequently turned over to Homicide Detective Sanborn, who impounded it as evidence.

Homicide Detectives Sanborn and Mauch attempted to interview Tuly Tutaumua Lepolo; however, Lepolo did not wish to provide a statement regarding the case. Lepolo stated he was not in Las Vegas at the time of the murder.

On 09-11-17, Forensic Scientist Allison Rubino completed the requested Biology/DNA Forensic work regarding the comparison of Tuly Lepolo's known DNA to the evidence. The DNA profile obtained from the swab from the mouth of the Monster Energy can from the center console drink holder was consistent with a distinguishable mixture of at least two individuals, with at least one being a male. The major DNA profile was consistent with Tuly Lepolo. The DNA profile obtained from the swab from the steering wheel and shift lever of the 2004 Suburban was consistent with a distinguishable mixture of at least three individuals, with at least one being a male. The major DNA profile was consistent with Tuly Lepolo. The full DNA profiles obtained from the blood samples AB1, AB2, AB3, and AB4, were consistent with Tuly Lepolo.

The complex relationships between the party attendees (witnesses) and the shooters resulted in the lack of cooperation during the follow-up investigation. Investigators believed witnesses from both sides knew the identity of both of the respective shooters. Investigators also noted that victim Raquel Stapinski was not a blood relative to either side of the suspected shooters, which furthered the lack of the cooperation.

1 JUSTICE COURT, LAS VEGAS TOWNSHIP
2 CLARK COUNTY, NEVADA

3 THE STATE OF NEVADA, 2019 AUG -5 A 11: 31

4 Plaintiff, JUSTICE COURT
LAS VEGAS, NEVADA

CASE NO: 19F15993A-B

5 -vs-

DEPT NO: 11

6 TULY LEPOLO #8471381,
7 HENRY TAYLOR #1884899,

8 Defendants.

CRIMINAL COMPLAINT

9 The Defendants above named having committed the crime of MURDER WITH USE
10 OF A DEADLY WEAPON (Category A Felony - NRS 200.010, 200.030, 193.165 - NOC
11 50001), in the manner following, to wit: That the said Defendants, on or about the 3rd day of
12 April, 2016, at and within the County of Clark, State of Nevada, did willfully, unlawfully,
13 feloniously and with malice aforethought, kill RAQUEL STAPINSKI, a human being, with
14 use of a deadly weapon, to wit: firearm, by shooting at and into the body of the said RAQUEL
15 STAPINSKI, the said killing having been (1) willful and premeditated, and/or (2) pursuant to
16 a challenge to fight by each Defendant whereby RAQUEL STAPINSKI was shot and killed
17 in the cross-fire.

18 All of which is contrary to the form, force and effect of Statutes in such cases made and
19 provided and against the peace and dignity of the State of Nevada. Said Complainant makes
20 this declaration subject to the penalty of perjury.

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22 _____
23 08/05/19

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27 19F15993A-B/lal
28 LVMPD EV# 160403003524
(TK11)

19F15993A
CRM
Criminal Complaint
11286988



ORIGINAL

LAS VEGAS JUSTICE COURT
FILED IN OPEN COURT

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

JAN 06 2020

BY: 

THE STATE OF NEVADA,

Plaintiff,

-vs-

TULY LEPOLO #8471381,
HENRY TAYLOR #1884899,

Defendants.

CASE NO: 19F15993A-B

DEPT NO: 11

AMENDED
CRIMINAL COMPLAINT

The Defendants above named having committed the crime of MURDER WITH USE OF A DEADLY WEAPON (Category A Felony - NRS 200.010, 200.030, 193.165 - NOC 50001) and ASSAULT WITH A DEADLY WEAPON (Category B Felony - NRS 200.471 - NOC 50201), in the manner following, to wit: That the said Defendants, on or about the 3rd day of April, 2016, at and within the County of Clark, State of Nevada,

COUNT 1 - MURDER WITH USE OF A DEADLY WEAPON

did willfully, unlawfully, feloniously and with malice aforethought, kill RAQUEL STAPINSKI, a human being, with use of a deadly weapon, to wit: firearm, by shooting at and into the body of the said RAQUEL STAPINSKI, the said killing having been (1) willful and premeditated, and/or (2) pursuant to a challenge to fight by each Defendant whereby RAQUEL STAPINSKI was shot and killed in the cross-fire.

COUNT 2 - ASSAULT WITH A DEADLY WEAPON

did willfully, unlawfully, feloniously and intentionally place another person in reasonable apprehension of immediate bodily harm and/or did willfully and unlawfully attempt to use physical force against another person, to wit: FLORA MARIE TAYLOR, with use of a deadly weapon, to wit: a firearm, by pointing said firearm at FLORA MARIE TAYLOR.

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19F15993A
ACRM
Amended Criminal Complaint
11924173



1 All of which is contrary to the form, force and effect of Statutes in such cases made and
2 provided and against the peace and dignity of the State of Nevada. Said Complainant makes
3 this declaration subject to the penalty of perjury.

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19F15993A-B/dd-MVU
LVMPD EV# 160403003524
(TK11)

**Justice Court, Las Vegas Township
Clark County, Nevada**

Department: 11

Amended Court Minutes



L011930926

19F15993A State of Nevada vs. LEPOLO, TULY

Lead Atty: Special Public Defender

1/6/2020 9:00:00 AM Preliminary Hearing (In Custody)

Result: Bound Over

PARTIES PRESENT:	State Of Nevada	Thomas, Morgan
	Attorney	Special Public Defender
	Defendant	LEPOLO, TULY

Judge: Goodman, Eric

Court Reporter: Smith, Patsy

Court Clerk: Contreras, Chrystina

PROCEEDINGS

Events: Amended Criminal Complaint

Filed in Open Court

Unconditional Bind Over to District Court

Review Date: 1/7/2020

Defendant unconditionally waives right to Preliminary Hearing. Defendant Bound Over to District Court as Charged. Defendant to Appear in the Lower Level Arraignment Courtroom A.

Remand - Cash or Surety

Counts: 001; 002 - \$0.00/\$0.00 Total Bail

Case Closed - Bound Over

District Court Appearance Date Set

Jan 14 2020 9:00AM: In Custody

Charges: 002: Assault, with use of deadly weapon

Plea/Disp: 001: Open murder - with the use of a deadly weapon or tear gas [50001]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

002: Assault, with use of deadly weapon [50201]

Disposition: Waiver of Preliminary Hearing - Bound Over to District Court

**Justice Court, Las Vegas Township
Clark County, Nevada**

Department: 11

Court Minutes



L011655641

19F15993A State of Nevada vs. LEPOLO, TULY

Lead Atty: Special Public Defender

**10/28/2019 7:30:00 AM Arrest Warrant Return
Hearing (In Custody)**

Result: Matter Heard

PARTIES PRESENT:
State Of Nevada Attorney
Orwoll, Andrea
Savage, Jordan S.
Defendant
LEPOLO, TULY

Judge: Goodman, Eric

Court Reporter: Smith, Patsy

Court Clerk: Veloz, Edward

PROCEEDINGS

Attorneys:	Savage, Jordan S.	LEPOLO, TULY	Added
	Special Public Defender	LEPOLO, TULY	Added

Hearings:	10/29/2019 7:30:00 AM: Status Check	Added
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Events: Initial Appearance Completed

Advised of Charges on Criminal Complaint, Waives Reading of Criminal Complaint

Defendant Identified as Indigent

Defendant and the Court discussed the appointment of counsel and defendant requested appointment of counsel.

Special Public Defender Appointed

Status Check

Special Public Defender to do a conflict check.

Bail Stands - Cash or Surety

Counts: 001 - \$0.00/\$0.00 Total Bail

Bail to be Set in Court

WARRANT ELECTRONICALLY GENERATED AND ENTERED INTO NCJIS
***** DO NOT MANUALLY ENTER INTO NCJIS ******

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

State Of Nevada VS LEPOLO, TULY ID# : 8471381	Case No: 19F15993A Warrant No: 19F15993A-2019-1 Dept No: 11 Agency: Metro-DTAC/PSU
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Arrest Warrant

THE STATE OF NEVADA,

TO: ANY SHERIFF, CONSTABLE, MARSHALL, POLICEMAN, OR PEACE OFFICER IN THIS STATE:

A COMPLAINT AND AN AFFIDAVIT UPON OATH HAS THIS DAY BEEN LAID BEFORE ME ACCUSING
LEPOLO, TULY, OF THE CRIME(S);

BAIL TERMS

COUNTS	CHARGE	CASH	SURETY
001	Open murder, e/dw [50001] [F]		Hold Without Bail

YOU ARE, THEREFORE, COMMANDED FORTHWITH TO ARREST THE ABOVE NAMED DEFENDANT AND BRING
HIM BEFORE THIS COURT, OR IF THE COURT HAS ADJOURNED, THAT YOU DELIVER HIM INTO THE CUSTODY
OF THE SHERIFF OF THE COUNTY OF CLARK.

THIS WARRANT MAY BE SERVED AT ANY HOUR OF THE DAY OR NIGHT.

GIVEN UNDER MY HAND THIS **5th DAY OF August 2019**



JUSTICE OF THE PEACE IN AND FOR SAID TOWNSHIP

Susan Baucum

SHERIFF'S RETURN

I HEREBY CERTIFY THAT I RECEIVED THE ABOVE AND FORGOING WARRANT ON THE _____
DAY OF _____, _____, AND SERVED THE SAME BY ARRESTING AND BRINGING
DEFENDANT, _____, INTO COURT THIS _____ DAY OF
_____.

JOSEPH LOMBARDO, SHERIFF, CLARK COUNTY, NEVADA

BY: _____, DEPUTY