

1 JUSTICE COURT, LAS VEGAS TOWNSHIP

2 CLARK COUNTY, NEVADA

3 THE STATE OF NEVADA,)

4 Plaintiff,)

5 -vs-)

6 VICTOR ANTONIO VELIZ #2733155,)
7 TIMOTHY WILLIAM CHESTER)
8 #2733171,)

9 Defendants.)

CASE NO: 09F20574A-B

DEPT NO: 11

AMENDED
CRIMINAL COMPLAINT

10 The Defendants above named having committed the crimes of CONSPIRACY TO
11 COMMIT MURDER (Felony – NRS 199.480, 200.010, 200.030), BURGLARY WHILE IN
12 POSSESSION OF A DEADLY WEAPON (Felony – NRS 205.060), MURDER WITH USE
13 OF A DEADLY WEAPON (Felony – NRS 200.010, 200.030, 193.165) and ROBBERY
14 WITH USE OF A DEADLY WEAPON (Felony – NRS 200.380, 193.365), in the manner
15 following, to-wit: That the said Defendants, on or about the 30th day of September, 2009, at
16 and within the County of Clark, State of Nevada,

17 COUNT 1 – CONSPIRACY TO COMMIT MURDER

18 Defendants did then and there meet with each other and between themselves, and
19 each of them with the other, willfully, unlawfully and feloniously conspire and agree to
20 commit the crime of murder.

21 COUNT 2 – BURGLARY WHILE IN POSSESSION OF A DEADLY WEAPON

22 Defendants did then and there willfully, unlawfully and feloniously enter, with intent
23 to commit assault and/or battery and/or a felony, to-wit: murder and/or robbery, that certain
24 building occupied by THOMAS CHESTER and/or CARLA CHESTER, located at 1515
25 South Mojave Road, Space 21, Las Vegas, Clark County, Nevada, Defendants taking and/or
26 obtaining a deadly weapon while inside said residence, to-wit: a firearm.

27 COUNT 3 – MURDER WITH USE OF A DEADLY WEAPON (OPEN MURDER)

28 Defendants did then and there willfully, unlawfully, feloniously, without authority of

1 law, and with malice aforethought, kill THOMAS CHESTER, a human being, by shooting at
2 and into the head and neck of the said THOMAS CHESTER with use of a deadly weapon,
3 to-wit: a firearm, and/or by striking or beating the head and/or face of the said THOMAS
4 CHESTER with use of a deadly weapon, to-wit: a firearm, said killing having been willful,
5 deliberate and premeditated and/or perpetrated during the commission or attempted
6 commission of a robbery, said Defendants being responsible under one or more of the
7 following principles of criminal liability, to-wit: (1) by each Defendant directly committing
8 the acts constituting the offense; and/or (2) by said Defendants conspiring with each other to
9 commit the offense of murder, with the specific intent that a killing occur, whereby each is
10 vicariously liable for the foreseeable acts of the other made in furtherance of the conspiracy;
11 and/or (3) by said Defendants aiding or abetting each other in the commission of the crime,
12 with the specific intent that a killing occur, by counseling, encouraging, commanding or
13 procuring the other to commit the offense, Defendant TIMOTHY WILLIAM CHESTER
14 having asked VICTOR ANTONIO VELIZ to kill THOMAS CHESTER, Defendants
15 thereafter accompanied each other to the crime scene where TIMOTHY WILLIAM
16 CHESTER provided a firearm to VICTOR ANTONIO VELIZ for the purpose of killing
17 THOMAS CHESTER, VICTOR ANTONIO VELIZ thereafter did shoot at or into the head
18 and neck of THOMAS CHESTER with the firearm and/or strike or beat the head and/or face
19 of the said THOMAS CHESTER with the firearm while TIMOTHY WILLIAM CHESTER
20 acted as lookout, Defendants acting in concert throughout.

21 COUNT 4 – MURDER WITH USE OF A DEADLY WEAPON (OPEN MURDER)

22 Defendants did then and there willfully, unlawfully, feloniously, without authority of
23 law, and with malice aforethought, kill CARLA CHESTER, a human being, by stabbing into
24 the neck of the said CARLA CHESTER with use of a deadly weapon, to-wit: a knife, and/or
25 by striking or beating the head of the said CARLA CHESTER with use of a deadly weapon,
26 to-wit: a firearm, said killing having been willful, deliberate and premeditated and/or
27 perpetrated during the commission or attempted commission of a robbery as set in Count 5,
28 said Defendants being responsible under one or more of the following principles of criminal

1 liability, to-wit: (1) by each Defendant directly committing the acts constituting the offense;
2 and/or (2) by said Defendants conspiring with each other to commit the offense of murder,
3 with the specific intent that a killing occur, whereby each is vicariously liable for the
4 foreseeable acts of the other made in furtherance of the conspiracy; and/or (3) by said
5 Defendants aiding or abetting each other in the commission of the crime, with the specific
6 intent that a killing occur, by counseling, encouraging, commanding or procuring the other to
7 commit the offense, Defendant TIMOTHY WILLIAM CHESTER having asked VICTOR
8 ANTONIO VELIZ to kill CARLA CHESTER, Defendants thereafter accompanied each
9 other to the crime scene where TIMOTHY WILLIAM CHESTER provided a firearm to
10 VICTOR ANTONIO VELIZ for the purpose of killing CARLA CHESTER, VICTOR
11 ANTONIO VELIZ thereafter did stab at or into the neck of CARLA CHESTER with the
12 knife and/or strike or beat the head of the said CARLA CHESTER with the firearm while
13 TIMOTHY WILLIAM CHESTER acted as lookout, Defendants acting in concert
14 throughout.

15 COUNT 5 – ROBBERY WITH USE OF A DEADLY WEAPON

16 Defendants did then and there willfully, unlawfully and feloniously take personal
17 property, to-wit: keys and a 2009 Dodge Journey, bearing Nevada License No. PH76460,
18 from the person of THOMAS CHESTER and/or CARLA CHESTER, or in their presence,
19 by means of force or violence or fear of injury to, and without the consent and against the
20 will of the said THOMAS CHESTER and/or CARLA CHESTER, said Defendants using a
21 deadly weapon in the commission of the crime, to-wit: a firearm and/or a knife, said
22 Defendants being responsible under one or more of the following principles of criminal
23 liability, to-wit: (1) by each Defendant directly committing the acts constituting the offense;
24 and/or (2) by said Defendants conspiring with each other to commit the offense of robbery
25 whereby each is vicariously liable for the foreseeable acts of the other made in furtherance of
26 the conspiracy; and/or (3) by said Defendants aiding or abetting each other in the
27 commission of the crime by counseling, encouraging, commanding or procuring the other to
28 commit the offense, Defendant TIMOTHY WILLIAM CHESTER having asked VICTOR

1 ANTONIO VELIZ to kill THOMAS CHESTER and/or CARLA CHESTER, Defendants
2 thereafter accompanied each other to the crime scene where TIMOTHY WILLIAM
3 CHESTER provided a firearm to VICTOR ANTONIO VELIZ for the purpose of killing
4 THOMAS CHESTER and/or CARLA CHESTER, VICTOR ANTONIO VELIZ thereafter
5 did shoot at and into the head and/or neck of THOMAS CHESTER and/or beat the head and
6 face of THOMAS CHESTER with a firearm and stab at or into the neck of CARLA
7 CHESTER with a knife and/or beat the head of the said CARLA CHESTER with a firearm
8 while TIMOTHY WILLIAM CHESTER acted as lookout, TIMOTHY WILLIAM
9 CHESTER thereafter did flee from the scene in the said vehicle.

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

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