

0001

1 BILL LOCKYER, Attorney General  
of the State of California  
2 ROBERT A. ANDERSON,  
Chief Assistant Attorney General  
3 GARY W. SCHONS, Senior Assistant  
Attorney General  
4 DAVID P. DRULINER, Special Assistant  
Attorney General  
5 California State Bar No. 065673

6 1300 I Street  
P.O. Box 944255  
7 Sacramento, California 95814  
Telephone: (916) 324-5430  
8

9 Attorneys for Plaintiff

FILED  
OCT 15 11 8:19  
CLERK

10  
11 IN THE SUPERIOR COURT, STATE OF CALIFORNIA  
12 COUNTY OF SAN DIEGO, CENTRAL JUSTICE CENTER  
13

14 PEOPLE OF THE STATE OF CALIFORNIA,  
15 Plaintiff,

16 v.

17 RICHARD RAYMOND TUITE,  
18 Defendant.

CASE NO. *CD166932*

FELONY  
COMPLAINT

19  
20 I, the undersigned, hereby certify, or on information and belief:

21 **COUNT I (Pen. Code § 187 (a))**

22 **WILLFUL, DELIBERATE, PREMEDITATED MURDER**

23 That on or about January 21, 1998, in the County of San Diego, State of California,  
24 the crime of Willful, Deliberate, Premeditated Murder, in violation of SECTION 187,  
25 subdivision (a), of the PENAL CODE, a Felony, was committed by RICHARD RAYMOND  
26 TUITE, who at the time and place last stated, did willfully, unlawfully, and with malice  
27 aforethought, and deliberation and premeditation, murder STEPHANIE CROWE, a human  
28 being.

1 It is further alleged that said RICHARD RAYMOND TUIITE, personally used a deadly  
 2 or dangerous weapon, to wit: a knife, in the commission of the above offense and in  
 3 violation of Penal Code section 12022, subdivision (b).

4 NOTICE: Conviction of this offense will require you to provide specimens and  
 5 samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and  
 6 samples is a crime.

7 NOTICE: This offense alleged as to Count I is a serious felony pursuant to Penal  
 8 Code section 1192.7(c).

9 **PRIOR CONVICTIONS**

10 **PRISON PRIOR**

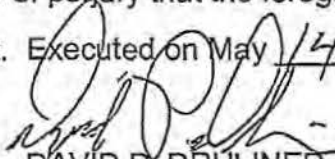
11 And it is further alleged that said defendant, RICHARD RAYMOND TUIITE  
 12 served a separate prison term for the following offense, which under California law is  
 13 punishable by imprisonment in state prison whether in California or elsewhere, and that he  
 14 has not remained free of prison custody and free of the commission of an offense resulting  
 15 in a felony conviction for five years subsequent to his release from prison for the felony  
 16 below, within the meaning of PENAL CODE SECTION 667.5, subdivision (b).

17 (CHARGE)	(CONV-DATE)	(COURT #)	(COURT)
18 VC 10851	1/28/92	CRN17836	San Diego Superior Court

19 **DISCOVERY REQUEST**

20 Pursuant to Penal Code section 1054.5(b), the People are hereby informally  
 21 requesting that all defense counsel provide discovery to the People as required by Penal  
 22 Code section 1054.3.

23 I certify under the penalty of perjury that the foregoing is true and correct and that  
 24 this Complaint contains 1 Count. Executed on May 14, 2002, San Diego, California.

25   
 26 DAVID P. DRULINER  
 27 Special Assistant Attorney General

28 BAIL RECOMMENDATION: NO BAIL