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## Declaration of Ashley Winfrey

I, Ashley Winfrey, hereby declare as follows:

1. My name is Ashley Winfrey. I am 39 years old and reside in Clark County, Nevada. I am the stepdaughter of Leonard Taylor, and the maternal sibling of his biological daughter, Deja Taylor.
2. I first met Leonard in 1989 or 1990 when I was six or seven years old. My sister Kaylyn was just an infant at the time. Leonard was dating my mother Mia Perry and their relationship had become serious, so she introduced him to our whole family. My grandmother was cooking hot water biscuits, chicken, and collard greens that evening, which was one of the dishes she cooked on special occasions. Leonard was a tall, polite, well-dressed, and handsome young man with a country accent. He had a big personality that was warm, positive, and happy. Everyone in our family immediately took a liking to him. My grandmother though he was the nicest man my mother ever brought home to meet her. Leonard was kind and respectful towards everyone in our family, and he purchased a bicycle for me shortly after we met. When I consider all the men that my mother was involved with, the only time she ever seemed truly in love was when she was with Leonard. Leonard also treated my mother better than the other men who were in her life.
3. I never had a chance to know my father because he was not a part of my life. My mother was only 17 years old when I was born, but my father was in his mid-twenties, so he was arrested and sent to prison for sexually



1 abusing a minor. I met my biological father on one occasion, but he made  
2 it clear that he wanted nothing to do with me.

3 4. Leonard was the only father figure that I ever had during my childhood.

4 None of the other men in my mother's life ever treated me and my siblings  
5 good or paid us any attention. Rather, they treated us like an  
6 inconvenience and made us feel like we were just in the way. Leonard, on  
7 the other hand, showed me and my siblings a lot of love and went out of  
8 his way to make us feel special.

9 5. Leonard did not abuse me, my mother, or Kaylyn in any way. He showed  
10 an interest in my schoolwork and took us places outside of the  
11 neighborhood to let us know that there was more to life than the negative  
12 activity that was present on the streets of San Bernardino, California.

13 6. Leonard encouraged my participation in the Girl Scouts. I recall an  
14 instance when my mother did not want to attend a meeting when it was  
15 her turn to supply the snacks. After speaking with my mother, Leonard  
16 ended up coming to the meeting with her and he also brought along the  
17 snacks. Leonard placed a priority on being present and engaging in any  
18 activity that furthered our development.

19 7. Leonard tried to help me work through the anger issues that I suffered  
20 from as a child. He was the only one who took time out to listen to me and  
21 help calm me down when things were not going well. He was a very  
22 patient and loving person and made me feel like everything would be  
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1           alright. He was the only person that ever earned my respect enough to  
2           call him Dad.

3           8. Although Leonard was a good father figure and supportive partner for my  
4           mother, I did have the sense that he was involved in street activities.

5           Early on in his relationship with my mom, when I was about eight years  
6           old, I recall police officers coming to our house when we were living in San  
7           Bernardino, California. The police questioned him and searched our entire  
8           home, but they did not arrest Leonard. I have no idea what they may have  
9           been looking for or what they questioned him about, but it was a tense  
10          situation.

11          9. I recall an instance when Leonard left our home, in San Bernardino, to  
12          buy the family pizza for dinner. When he returned home, he was visibly  
13          upset and when my mom asked him what was wrong, he said nothing and  
14          that he had just got into an argument with someone over a parking space.  
15          Shortly afterwards, a hail of gunshots rang out and we all had to hit the  
16          floor. Fortunately, no one was injured, but we later discovered that the  
17          windows on Leonard's car were shot out.

18          10. We stayed in San Bernardino for a couple of years before our family  
19          relocated to Tacoma, Washington, where my sister Deja Taylor was later  
20          born in 1991. I don't know why my mom and Leonard decided to move to  
21          Washington, but I think they were trying to escape California's street life.  
22          Nonetheless, his street activities may have continued in Tacoma, as well.

1 11. Leonard was arrested for his prior offense and sentenced to a prison term  
2 shortly after we moved to Tacoma. We did not see or hear from him again  
3 for many years.

4 12. During that Thanksgiving weekend, in 2004, I was living on my own in  
5 Northern California when Leonard visited my mother and Deja in Watts,  
6 California. My mother told me all about the visit and how good it was for  
7 them to see him. My sister Deja was just a baby when he went off to  
8 prison, so this was like the first time she had ever seen or spoken with her  
9 father. Deja was so happy to finally connect with her father and was  
10 looking forward to building a longstanding relationship with him. I was  
11 looking forward to seeing Leonard myself because he was the only father I  
12 knew. I was the only one among my siblings that remembered living with  
13 him.

14 13. My mother and Deja told me about the phone call that Leonard made  
15 during his visit to his new family back in St. Louis. It was a positive  
16 interaction. The St. Louis family was happy to speak with Deja and vice  
17 versa. Leonard called me either that same evening of the visit or the next  
18 day and we spoke for a while. Leonard told me about his release from  
19 custody and what had been going on in his life, but he was more  
20 interested in finding out about my life and how I was doing. He was most  
21 happy to hear that I had a child, which made him a grandfather. Leonard  
22 wanted to meet my daughter and spoke of plans to return to California to  
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1 spend time with us. However, Leonard never called or returned  
2 afterwards, and we did not know what happened to him.

3 14. A few years following Leonard's Thanksgiving visit, I searched online for  
4 any information that I could find about him. This is when I learned that  
5 he was convicted for allegedly killing his girlfriend and her children. The  
6 trial had just wrapped up at the time and he was sent to death row. This  
7 is when me and Deja reached out to him and began corresponding with  
8 Leonard via letters and phone calls, and we've remained in constant  
9 contact with him ever since that time.

10 15. I read about Leonard's case in news articles and other online resources,  
11 and my heart goes out to the victims. It was a horrific crime, and I cannot  
12 imagine what the surviving relatives must be going through. However, I  
13 still find it hard to believe that Leonard could do such an awful act. What  
14 he's been accused of is totally out of character for him because he was  
15 never violent with us when he lived with my family. I have never heard of  
16 or witnessed Leonard harming women or children in any way. In fact, he  
17 was always calm and did not lash out at my mother even when she yelled  
18 and verbally abused him, which happened on several occasions. Leonard  
19 also never touch me or my siblings in an inappropriate manner. I have no  
20 recollection of Leonard losing his temper and behaving in a manner that  
21 made me fearful that he would hurt us in any way.

22 16. If Leonard was responsible in any way for the deaths of the victims, I  
23 believe it could have possibly been connected to any enemies he may have

1 made through his street activities. I thought back to the pizza run  
2 incident that occurred when I was eight years old. My family and I could  
3 all have been killed that night, not because of Leonard harming us in any  
4 way, but because of the enemies he made outside of our house who wanted  
5 to harm him so badly that we were placed in harm's way.

6 17. I reconnected with Leonard through phone calls in the years following his  
7 incarceration in Missouri, and he's been the same father figure that I  
8 knew and loved as a child. He is still interested in my thoughts and goals,  
9 he is still a good and unjudgmental listener, and he still gives me  
10 excellent advice. Leonard has been a tremendous support to me over the  
11 years. Although we only communicate by phone calls and letters, he has  
12 shown up and remained present for me emotionally. Leonard has even  
13 spoken with my children. If Leonard came home today I would have  
14 absolutely no reservations with him being around or even watching my  
15 children for me.

16 18. Although Leonard does not tell me much about his case, I've had the  
17 feeling that things have not been going well. We usually speak at least  
18 once a week, but his calls began to slow down this summer and he seemed  
19 very depressed during our last conversations. I have no idea how my sister  
20 Deja will cope with possibly losing her father because they have developed  
21 a relationship that is even closer than the one that I share with him. Deja  
22 is very sensitive and does not process loss very well. She's been crying  
23 every time that her father's name is mentioned lately.

1 19. I was not contacted by Leonard's trial attorneys. Leonard is a proud man,  
2 and I would not be surprised if he did not want his attorneys to contact us,  
3 but I wish that they did. Although Leonard provides me with good advice,  
4 it is a two-way street. He listens to the advice that I provide, and I have  
5 no doubt that I could have talked him down and help him understand the  
6 importance of allowing his attorneys to conduct a full life history  
7 investigation. I also would have been willing to take the stand and asked  
8 the jury to spare my stepfather's life.

9 I declare under penalty of perjury that the foregoing is true and correct to the  
10 best of my knowledge. This declaration was executed in Clark County, Nevada, on  
11 November 9<sup>th</sup>, 2022.

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