

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK

-against-

ADRIENNE MANIGAULT,
CO-DEFENDANT,

Defendants.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law § 105.10(1), committed as follows:

The defendants in the County of New York and elsewhere, during the period from on or about May 14, 2022, to on or about January 21, 2023, with intent that conduct constituting the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** be performed, said crime being a class “C” felony, agreed with each other, and with others, to engage in and cause the performance of such conduct.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from on or about May 14, 2022, to on or about January 21, 2023, the following overt acts, among others, were committed in New York County, and elsewhere:

1. On or about May 14, 2022, defendant **CO-DEFENDANT1** ordered on Amazon.com, Inc., a 3D printer, to wit, an “Official Creality Ender 3 Pro 3D Printer with Removable Build Surface Plate and Branded Power Supply, FDM 3D Printers for DIY Home and School Printing Size 8.66x8.66x9.84 inch.”
2. On or about May 14, 2022, defendant **CO-DEFENDANT1** ordered on Amazon.com, Inc., 3D printer filament, to wit, a “Polymaker PLA PRO Filament 1.75mm Blue, Powerful PLA Filament 1.75mm 3D Printer Filament 1kg - PolyLite 1.75 PLA Filament PRO Tough & High Rigidity 3D Printing PLA Filament Blue.”
3. On or about May 26, 2022, defendant ADRIENNE MANIGAULT sent a text message to defendant **CO-DEFENDANT1** that stated in substance, “I want to see you print something.”
4. On or about June 15, 2022, defendant **CO-DEFENDANT1** sent defendant ADRIENNE MANIGAULT a text message containing an image of a 3-D printed white, Harlot derringer.

5. On or about July 23, 2022, defendant **CO-DEFENDANT** sent defendant ADRIENNE MANIGAULT a text message that stated in substance, “I wanna make this can you buy it for me sugamama,” and sent a link to www.db-firearms.com/store/p/scarab-complete-hardware-kit, to buy a firearm hardware kit for a green firearm, called a “Scarab.”
6. On or about July 23, 2022, defendant ADRIENNE MANIGAULT sent defendant **CO-DEFENDANT** a text message that stated in substance that she was ordering firearm kit for the aforementioned “Scarab,” right now and then sent defendant **CO-DEFENDANT** a screenshot of the purchase confirmation for approximately \$76.00 from www.db-firearms.com, that had been sent to her email account.
7. On or about July 23, 2022, defendant **CO-DEFENDANT** sent defendant ADRIENNE MANIGAULT a text message that containing a link to <https://parts-dispensed.com/hi-point/88-lo-point-parts-kit>, and in substance asking defendant ADRIENNE MANIGAULT to buy firearm parts.
8. On or about July 23, 2022, defendant ADRIENNE MANIGAULT texted defendant **CO-DEFENDANT** in substance that she ordered the aforementioned firearm parts from <https://parts-dispensed.com> and sent defendant **CO-DEFENDANT** a screenshot of the purchase confirmation of firearm parts for \$101.89 that had been sent to her email account.

9. On or about July 24, 2022, defendant **CO-DEFENDANT** sent defendant ADRIENNE MANIGAULT \$100.00 via Zelle from his Municipal Credit Union Account No. 1501249.
10. On or about July 29, 2022, defendant **CO-DEFENDANT** ordered on Amazon.com, Inc., a second 3-D printer, to wit, a “Flashforge 3D Printer Adventurer 3 Pro with 2 Removable Nozzle, Glass Bed and Leveling-Free, Fully Assembled, High Precision Printing with PLA/ABS/PETG/PLA-CF/PETG-CF.”
11. On or about August 10, 2022, defendant **CO-DEFENDANT** ordered on Amazon.com, Inc., a third 3-D printer, to wit, a “Flashforge Adventurer 4 3D Printer Leveling-Free with Quick Removable High Temp Nozzle Large 3D Printer Built-in HD Camera and HEPA13 Air Filter, 220x200x250mm Printing Size.”
12. On or about August 15, 2022, defendant **CO-DEFENDANT** sent defendant ADRIENNE MANIGAULT a text message containing a video of a Flashforge 3-D printer printing a blue plastic lower receiver to a firearm, captured in the vicinity of ■■■ FDR Drive, Apartment ■■■, New York, New York, and defendant ADRIENNE MANIGAULT texted back the same day saying in substance, “Oh shit it’s coming out mad nice.”
13. On or about August 15, 2022, defendant **CO-DEFENDANT** sent defendant ADRIENNE MANIGAULT a text message containing an image of a fully constructed firearm with a blue plastic lower receiver.

14. On or about August 16, 2022, defendant ADRIENNE MANIGAULT ordered firearm parts on eBay, Inc., to wit, “Patmos Revelation Slide W/ Sights + Barrel + Upper Lower Parts for Glock 26 Gen 3” for \$325.54.
15. On or about August 16, 2022, defendant ADRIENNE MANIGAULT ordered more firearm parts on eBay, Inc., to wit, “Patmos Judah Slide W/ Sights + Barrel + Upper Lower Parts for Glock 19 Gen3 Black” for \$347.31.
16. On or about August 20, 2022, defendant **CO-DEFENDANT** sent defendant ADRIENNE MANIGAULT a text message containing a link to <https://parts-dispensed.com> to buy a firearms kit, to wit, a “Lo-Point (C9) Parts Kit” for approximately \$86.99.
17. On or about August 20, 2022, defendant **CO-DEFENDANT** texted defendant ADRIENNE MANIGAULT a link to <https://parts-dispensed.com> to buy a firearms kit, to wit, a “Glock 26 Rail Kit – FMDA DD26.2,” for \$39.79.
18. On or about August 20, 2022, defendant **CO-DEFENDANT** texted defendant ADRIENNE MANIGAULT a link to <https://parts-dispensed.com> to buy a firearm part, to wit, a “Hi Point C9 Magazine,” for \$20.00.
19. On or about August 20, 2022, defendant **CO-DEFENDANT** texted defendant ADRIENNE MANIGAULT a link to <https://parts-dispensed.com> to buy a firearms part, to wit, a “Hi-Point JHP45, 4595TS, .45 ACP 9-Round Magazine.”

20. On or about August 20, 2022, defendant ADRIENNE MANIGAULT sent defendant **CO-DEFENDANT** a text message in substance, “Ordering them now,” in reference to defendant **CO-DEFENDANT’S** August 20, 2022 requests for defendant ADRIENNE MANIGAULT to purchase two sets of firearm kits and two firearm parts.
21. On or about August 20, 2022, defendant ADRIENNE MANIGAULT sent defendant **CO-DEFENDANT** a screenshot of the purchase confirmation from <https://parts-dispensed.com> that had been sent to her email account.
22. On or about August 21, 2022, defendant **CO-DEFENDANT** texted defendant ADRIENNE MANIGAULT, in substance asking her if she was still in the house, and defendant ADRIENNE MANIGAULT sent defendant **CO-DEFENDANT** back an image of a Flashforge 3-D Printer printing the blue plastic lower receiver to a firearm.
23. On or about August 21, 2022, defendant ADRIENNE MANIGAULT sent defendant **CO-DEFENDANT** a second image of a Flashforge 3-D Printer printing the blue plastic lower receiver to a firearm.
24. On or about August 30, 2022, defendant **CO-DEFENDANT** sent defendant ADRIENNE MANIGAULT an image of a firearm with a blue plastic lower receiver.

25. On or about August 30, 2022, defendant ADRIENNE MANIGAULT texted defendant **CO-DEFENDANT** a series of text messages that stated in substance it was beautiful and she loved it and, “I want to shoot it,” in response to defendant **CO-DEFENDANT** sending her an image of a firearm with a blue plastic lower receiver on August 30, 2022.
26. On or about October 27, 2022, defendant **CO-DEFENDANT** texted defendant ADRIENNE MANIGAULT a link to <https://parts-dispensed.com> and in substance asked her to buy a firearms kit, to wit, a “Lo-Point (C9) Parts Kit,” for approximately \$106.99.
27. On or about October 27, 2022, defendant **CO-DEFENDANT** texted defendant ADRIENNE MANIGAULT a link to <https://parts-dispensed.com> and in substance asked her to buy a firearm part, to wit, a “Hi Point C9 Magazine,” for approximately \$20.99.
28. On or about October 27, 2022, defendant ADRIENNE MANIGAULT texted defendant **CO-DEFENDANT** and stated in substance that she ordered a part for a firearm.
29. On November 20, 2022, defendant **CO-DEFENDANT** ordered on Amazon.com, Inc., 3D printer filament, to wit, “OVERTURE PLA Plus (PLA+) Filament 1.75mm PLA Professional Toughness Enhanced PLA Roll, Cardboard Spool, Premium PLA 1kg(2.2lbs), Dimensional Accuracy 99% Probability +/- 0.03mm (Digital Blue).”

30. On or about January 15, 2023, defendant **CO-DEFENDANT**, who was in the vicinity of ■ FDR Drive, New York, New York, texted defendant ADRIENNE MANIGAULT, who was inside of ■ FDR Drive, Apartment ■, New York, New York to suppress evidence with an act of concealment, alteration, and destruction, in substance saying in a series of text messages: “Yoooo...go...take it...out now...pleaser...she told...please...throw it out the window...bro...throw it out...its alot of them throw it out.”

31. On or about January 15, 2023, defendant ADRIENNE MANIGAULT, who was inside of ■ FDR Drive, Apartment ■, New York, New York replied to defendant **CO-DEFENDANT**, “I did,” when defendant **CO-DEFENDANT** asked her in substance to “throw it out the window...bro...throw it out...its alot of them throw it out.”

32. On or about January 15, 2023, defendant **CO-DEFENDANT**, who was in the vicinity of ■ FDR Drive, New York, New York, texted defendant ADRIENNE MANIGAULT, who was inside of ■ FDR Drive, Apartment ■, New York, New York to suppress evidence with an act of concealment, alteration, and destruction, in substance asking if there was any other evidence in the apartment, and telling her in substance to look near the printer and please hurry.

33. On or about January 15, 2023, at approximately 2:47 PM, defendant **CO-DEFENDANT**, in the vicinity of Police Service Area 4, located at 130 Loisaída Avenue, New York, New York, made a phone call to defendant ADRIENNE MANIGAULT after he was arrested and told her in substance to get his equipment out of the apartment before his brother takes it.
34. On or about January 15, 2023, at approximately 3:08 PM, defendant ADRIENNE MANIGAULT exited **█** FDR Drive, New York, New York carrying a bag, and left the vicinity of **█** FDR Drive.
35. On or about January 16, 2023, defendant **CO-DEFENDANT** possessed a firearm inside of **█** FDR Drive, Apartment **█**, New York, New York.
36. On or about January 16, 2023, defendant **CO-DEFENDANT** possessed a second firearm inside of **█** FDR Drive, Apartment **█**, New York, New York.
37. On or about January 16, 2023, defendant **CO-DEFENDANT** possessed a third firearm inside of **█** FDR Drive, Apartment **█**, New York, New York.
38. On or about January 16, 2023, defendant **CO-DEFENDANT** possessed a fourth firearm inside of **█** FDR Drive, Apartment **█**, New York, New York.
39. On or about January 16, 2023, defendant **CO-DEFENDANT** possessed a fifth firearm inside of **█** FDR Drive, Apartment **█**, New York, New York.
40. On or about January 16, 2023, defendant **CO-DEFENDANT** possessed a 3-D Printer inside of **█** FDR Drive, Apartment **█**, New York, New York.

41. On or about January 16, 2023, defendant **CO-DEFENDANT** possessed a second 3-D Printer inside of [REDACTED] FDR Drive, Apartment [REDACTED], New York, New York.
42. On or about January 16, 2023, defendant **CO-DEFENDANT** possessed approximately five spools of filament used in the 3-D printing process, inside of [REDACTED] FDR Drive, Apartment [REDACTED], New York, New York.
43. On or about January 16, 2023, defendant **CO-DEFENDANT** possessed a manual entitled “homemade 22-caliber revolver” inside of [REDACTED] FDR Drive, Apartment [REDACTED], New York, New York.
44. On or about January 16, 2023, defendant **CO-DEFENDANT** possessed a package from DB Firearms containing firearm parts inside of [REDACTED] FDR Drive, Apartment [REDACTED], New York, New York, that had been addressed to defendant ADRIENNE MANIGAULT, at [REDACTED] Georgia Avenue, Brooklyn, New York, and the postage for that package had been paid for on July 25, 2022.
45. On or about January 16, 2023, defendant **CO-DEFENDANT** possessed tools used in the firearm making process inside of [REDACTED] FDR Drive, Apartment [REDACTED], New York, New York, including but not limited to, a bench grinder, a drill, power tool, wrench, pliers, screws, screw drivers, and files.

46. Between January 15, 2023, and January 16, 2023, defendant ADRIENNE MANIGAULT went back to [REDACTED] FDR Drive, Apartment [REDACTED], New York, New York a second time, texting defendant CO-DEFENDANT [REDACTED] on January 16, 2023, in substance, "...they still at your house on your floor and all. Idk what's going on shit crazy...I went twice bro...idk what to do...I tried."

47. Between January 20, 2023, and January 21, 2023, defendant ADRIENNE MANIGAULT possessed a 3-D printer part inside of [REDACTED] Georgia Avenue, Brooklyn, New York.

48. Between January 20, 2023, and January 21, 2023, defendant ADRIENNE MANIGAULT possessed 3-D printer filament inside of [REDACTED] Georgia Avenue, Brooklyn, New York.

49. Between January 20, 2023, and January 21, 2023, defendant ADRIENNE MANIGAULT possessed various types of ammunition, including .45 caliber, 9 mm, and .380 caliber ammunition.

SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant ADRIENNE MANIGAULT of the crime of **TAMPERING WITH PHYSICAL EVIDENCE**, in violation of Penal Law § 215.40(2), committed as follows:

The defendant ADRIENNE MANIGAULT, in the County of New York, on or about January 15, 2023, believing that certain physical evidence was about to be produced and used in an official proceeding, and a prospective official proceeding, and intending to prevent such production and use, suppressed it by any act of concealment, alteration and destruction.

ALVIN L. BRAGG, JR.
District Attorney

Filed:

NA

No.

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ADRIENNE MANIGAULT

CO-DEFENDANT

Defendants.

INDICTMENT

CONSPIRACY IN THE FOURTH DEGREE, P.L. § 105.10(1), DEFS. A Manigault, **CO-DEFENDANT**
TAMPERING WITH PHYSICAL EVIDENCE, P.L. § 215.40(2), DEF. A Manigault

ALVIN L. BRAGG, JR., District Attorney

A True Bill
Foreman

Michael Kelley
Trial Bureau 70