

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

THE PEOPLE OF THE STATE OF NEW YORK

-against-

LUIGI MANGIONE,

Defendant.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendant of the crime of **MURDER IN THE FIRST DEGREE**, in violation of Penal Law §125.27(1)(a)(xiii) and (b), committed as follows:

The defendant, in the County of New York, on or about December 4, 2024, being more than eighteen years old at the time of the commission of the crime, with intent to cause the death of another person, caused the death of Brian Thompson, and said person was killed in furtherance of an act of terrorism, involving a violent act and acts dangerous to human life that were in violation of the criminal laws of this state and were intended to intimidate or coerce a civilian population, influence the policies of a unit of government by intimidation or coercion, and affect the conduct of a unit of government by murder, assassination or kidnapping.

SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **MURDER IN THE SECOND DEGREE AS A CRIME OF TERRORISM**, in violation of Penal Law §§125.25(1) and 490.25, committed as follows:

The defendant, in the County of New York, on or about December 4, 2024, with intent to intimidate or coerce a civilian population, influence the policy of a unit of government by intimidation or coercion, and affect the conduct of a unit of government by murder, assassination or kidnapping, committed the specified offense of MURDER IN THE SECOND DEGREE, in that defendant, with intent to the death of another person, caused the death of Brian Thompson.

THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **MURDER IN THE SECOND DEGREE**, in violation of Penal Law §125.25(1), committed as follows:

The defendant, in the County of New York, on or about December 4, 2024, with intent to cause the death of another person, caused the death of Brian Thompson.

FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the County of New York, on or about December 4, 2024, possessed a loaded firearm with intent to use the same unlawfully against another person.

FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, committed as follows:

The defendant, in the County of New York, on or about December 4, 2024, possessed a loaded firearm, said possession not being in defendant's home or place of business.

SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Penal Law §265.02(7), committed as follows:

The defendant, in the County of New York, on or about December 4, 2024, possessed an assault weapon.

SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Penal Law §265.02(2), committed as follows:

The defendant, in the County of New York, on or about December 4, 2024, possessed a firearm silencer.

EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Penal Law §265.02(8), committed as follows:

The defendant, in the County of New York, on or about December 4, 2024, possessed a large capacity ammunition feeding device, to wit, a “Glock” magazine.

NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Penal Law §265.02(8), committed as follows:

The defendant, in the County of New York, on or about December 4, 2024, possessed a large capacity ammunition feeding device, to wit, a “Magpul” magazine.

TENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE FOURTH DEGREE**, in violation of Penal Law §265.01(9), committed as follows:

The defendant, in the County of New York, on or about December 4, 2024, not being licensed as a gunsmith or dealer in firearms pursuant to Penal Law §400.00, and knowing that it was a ghost gun, possessed a ghost gun.

ELEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE**, in violation of Penal Law §170.25, committed as follows:

The defendant, in the County of New York, on or about November 24, 2024, knowing the instrument to be forged and with intent to defraud, deceive and injure another, uttered and possessed a forged instrument, the same being and purporting to be, and calculated to become and to represent if completed, a written instrument officially issued and created by a public office, public servant and governmental instrumentality, to wit, a New Jersey driver's license.

ALVIN L. BRAGG, JR.
District Attorney

No.

THE PEOPLE OF THE STATE OF NEW YORK

-against-

LUIGI MANGIONE,

Defendant.

INDICTMENT

- MURDER IN THE FIRST DEGREE, P.L. §125.27(1)(a)(xiii) and (b)
- MURDER IN THE SECOND DEGREE AS A CRIME OF TERRORISM, P.L. §§125.25(1) and 490.25
- MURDER IN THE SECOND DEGREE, P.L. §125.25(1)
- CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, P.L. §265.03(1)(b), an armed felony
- CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, P.L. §265.03(3), an armed felony
- CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, P.L. §265.02(7)
- CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, P.L. §265.02(1)
- CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, P.L. §265.02(8) (2 counts)
- CRIMINAL POSSESSION OF A WEAPON IN THE FOURTH DEGREE, P.L. §265.01(9)
- CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE, P.L. §170.25

ALVIN L. BRAGG JR., District Attorney

A True Bill

Joel Seidemann and Kristin Bailey
Trial Bureau 30 and Trial Bureau 40

Foreman

ADJOURNED TO PART _____ ON