

STATE OF NEW YORK: COUNTY OF WASHINGTON
JUSTICE COURT: TOWN OF HEBRON

THE PEOPLE OF THE STATE OF NEW YORK

Against
KEVIN D. MONAHAN
(10/28/1957)
Defendant

**ACCUSATORY INSTRUMENT
FELONY COMPLAINT**

I, Investigator T.A. Earl, of the Washington County Sheriff's Office located at 399 Broadway in Fort Edward, New York by this FELONY COMPLAINT, makes written accusation as follows:

That KEVIN D. MONAHAN, did on the 15th day of April 2023 at approximately 9:00pm to 9:50pm, located at 1263 Patterson Hill Road in the Town of Hebron, County of Washington, State of New York, did commit the offense of:

MURDER IN THE SECOND DEGREE

a CLASS A-1 FELONY, in violation of section 125.25 Subdivision 1 of the Penal Law of the State of New York, in that he did at the aforesaid time and place.

Count One: A PERSON IS GUILTY OF MURDER IN THE SECOND DEGREE WHEN HE:

1. WITH INTENT TO CAUSE THE DEATH OF ANOTHER PERSON, HE CAUSES THE DEATH OF SUCH PERSON OR OF A THIRD PERSON.

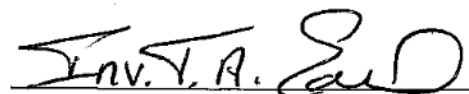
The facts upon which this information is based are as follows:

That on the 15th day of April 2023, between the approximate time of 9:00 p.m. to 9:50 p.m., at 1263 Patterson Hill Road in the Town of Hebron, County of Washington, the Defendant, KEVIN D. MONAHAN, with the intent to cause the death of another person, caused the death of such person, or of a third person, when he shot a firearm at the occupants of a motor vehicle and thereby caused the death of Kaylin A. Gillis (02/23/2003), an occupant of the vehicle.

All contrary to the provisions of the statute in such case made and provided.

Source of your deponent's information and grounds for his belief is based upon investigation by the Washington County Sheriff's Office and the New York State Police.

It is a crime, punishable as a Class A Misdemeanor under the laws of the State of New York, for a person, in and by a written instrument, to knowingly make a false statement, or to make a statement, which such person does not believe to be true. Affirmed under the penalty of perjury this 16th day of April 2023.



Investigator T.A. Earl
Complainant