

STATE OF NEW YORK
LOCAL CRIMINAL COURT

COUNTY OF DUTCHESS
TOWN OF CLINTON

THE PEOPLE OF THE STATE OF NEW YORK

-VS-

Christopher P. Moynihan

DOB: 12/6/1990

Defendant

Felony Complaint

ACCUSATION

BE IT KNOWN THAT, by this **FELONY COMPLAINT**, Senior Investigator Mathew D. Reilly, as the Complainant herein stationed at Troop K – SP Poughkeepsie BCI, accuses the above-mentioned defendant, Christopher T. Moynihan, DOB 12/6/1990, with having committed the Felony of Making a Terroristic Threat, in violation of Section 490.20 of the Penal Law of the State of New York.

FACTS

That on or about October 17th, 2025, in the Town of Clinton, County of Dutchess, State of New York, the Defendant, did intentionally and unlawfully commit the FELONY of Making a Terroristic Threat, in violation of 490.20 of the Penal Law of the State of New York. A person is guilty of Making a Terroristic Threat when, with intent to intimidate or coerce a civilian population, influence the policy of a unit of government by intimidation or coercion, or affect the conduct of a unit of government by murder, assassination, or kidnapping, he or she threatens to commit or cause to be committed a specified offense and thereby causes a reasonable expectation or fear of the imminent commission of such offense. Making a Terroristic Threat is a class D felony.

TO WIT: That on or about October 17th, 2025, the said Defendant did intentionally send text messages, which stated: "Hakeem Jeffries makes a speech in a few days in NYC I cannot allow this terrorist to live", "Even if I am hated he must be eliminated", "I will kill him for the future". Hakeem Jeffries is the Representative of the 8th Congressional District of New York in the United States Congress, a unit of government. These text messages placed the recipient in reasonable fear of the imminent murder and assassination of Hakeem Jeffries by the defendant.

All contrary to the provisions of the above-mentioned statute.

The above allegations of fact are made by the Complainant herein upon information and belief, with the sources of the Complainant's information and the grounds for belief being the facts obtained through a police investigation conducted by the New York State Police.

NOTICE

In a written instrument, any person who knowingly makes a false written statement which such person does not believe to be true has committed a crime under the laws of the State of New York punishable as a Class A Misdemeanor. (PL 210.45)

Affirmed under the penalty of perjury
this 18th of October, 2025.



COMPLAINANT
Mathew D. Reilly
Senior Investigator
New York State Police