

**Felony Complaint**

**Livingston County Sheriff's Office**

State of New York  
County of Livingston

People of the State of New York  
-vs-

**Town of Ossian**

**Richard A. Fluegel Jr.**

Defendant

I, Investigator Connor T. Sanford, the COMPLAINANT here in, stationed at Livingston County Sheriff's Office ACCUSE Richard A. Fluegel Jr., the DEFENDANT in this action, and charge that on or about the 8th day of December, 2024, at Bonner Road (Tax Map # 221.-1-28.14) in the Town of Ossian, County of Livingston, State of New York, at about 20:30 o'clock in the afternoon, said defendant did commit the felony of Criminal use of a firearm in the first degree contrary to the provisions of SECTION 265.09 (1)(a) of the Penal Law of the STATE OF NEW YORK by "intentionally, knowingly, recklessly, with criminal negligence"

**COUNT ONE: Criminal use of a firearm in the first degree (a felony)** A person is guilty of Criminal use of a firearm in the first degree when: (1) A person is guilty of criminal use of a firearm in the first degree when he commits any class B violent felony offense as defined in paragraph (a) of subdivision one of section 70.02 and he: (a) possesses a deadly weapon, if the weapon is a loaded weapon from which a shot, readily capable of producing death or other serious injury may be discharged.

The facts in which this Felony Complaint is based are as follows:

*On the aforementioned time, date, and place, the above named defendant, Richard A. Fluegel Jr. did commit the crime of criminal use of a firearm in the first degree when he knowingly and unlawfully possessed a deadly weapon which was loaded and he intentionally shot the victim, Richard A. Fluegel Sr. two times with a 12 gauge shotgun causing his death. All contrary to the provisions of this statute made and provided.*

The above allegations of fact are made by the Complainant herein (on direct knowledge and/or upon information and belief), with the sources of Complainant's information and the grounds for belief being the facts contained in the attached Supporting Deposition, attached to and made a part hereof.

Verification By Subscription And Notice  
Under Penal Law Section 210.45

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 written instrument, to knowingly make a false statement, or to make a statement, which such person does not believe to be true.

AFFIRMED UNDER PENALTY OF PERJURY THIS  
the 10th day of December, 2024

  
Complainant