

FIRST JUDICIAL DISTRICT COURT  
COUNTY OF SANTA FE  
STATE OF NEW MEXICO

FILED  
FIRST JUDICIAL  
DISTRICT COURT

EM

2024 JAN 19 PM 12:39

STATE OF NEW MEXICO,

Plaintiff,

vs.

No. D-0101-CR-202400 00013

STN: Not Available

Judge: T. GLENN ELLINGTON

ALEXANDER (ALEC) RAE BALDWIN,

DOB: XX/XX/1958

SSN: XXX-XX-3901

Defendant.

CHARGE: Involuntary Manslaughter

### GRAND JURY INDICTMENT

#### THE GRAND JURY CHARGES:

Count 1: **Involuntary Manslaughter (Negligent Use of a Firearm)**, (0007), on or about October 21, 2021, in Santa Fe County, State of New Mexico, at Bonanza Creek Ranch located at 545 Bonanza Creek Road, Santa Fe, New Mexico 87508 the above-named defendant did cause the death of Halyna Hutchins in the commission of Negligent Use of a Firearm, an unlawful act, which did not amount to a felony, a fourth degree felony, contrary to NMSA 1978, Section 30-2-3(B) (1994).

Or in the Alternative:

Count 1: **Involuntary Manslaughter (Without Due Caution or Circumspection)**, (0006), on or about October 21, 2021, in Santa Fe County, State of New Mexico, at Bonanza Creek Ranch located at 545 Bonanza Creek Road, Santa Fe, New Mexico 87508 the above-named defendant did cause the death of Halyna Hutchins by an act committed with the total disregard or indifference for the safety of others, and the act was such that an ordinary person would anticipate that death might occur under the circumstances, a fourth degree felony, contrary to NMSA 1978, Section 30-2-3(B) (1994).

The name(s) of the witness(es) upon whose testimony this Indictment is based are: Alexandria Hancock, Bryan Carpenter, Lane Luper, Ross Addeigo, Michael Haag, Marissa Poppell, Connor Rice.

I hereby certify that the foregoing instrument is a true Bill as to the felony counts listed above.

  
FOREPERSON

DATE: 1/19/2024

APPROVED:



Kari T. Morrissey  
Special Prosecutor