

STATE OF NEW YORK:
COUNTY OF ORANGE:

LOCAL COURT
TOWN OF WALKILL

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THE PEOPLE OF THE STATE OF NEW YORK

FELONY COMPLAINT

- *against* -

EDWARD V. HOLLEY 08/10/1980

BE IT KNOWN THAT, by this Complaint, Investigator Michael Corletta of the New York State Police, as the complainant herein, accuses the defendant, EDWARD V. HOLLEY, of committing the crime of Murder in the Second Degree in violation of §125.25(1) of the Penal Law of the State of New York in that the defendant, with the intent to cause the death of another person, he caused the death of such person, Megan McDonald, date of birth 05/02/1982. On or about or during the early morning hours of March 14, 2003, in a field located off Bowser Road, in the Town of Walkill, County of Orange, State of New York, the defendant, Edward V. Holley, did knowingly and intentionally cause the death of Megan McDonald by striking her multiple times about the head with a blunt instrument. Murder in the second degree is a class A-1 felony.

This felony complaint is based upon an investigation conducted by the New York State Police in conjunction with other law enforcement agencies, including, but not limited to the Federal Bureau of Investigation and the Orange County District Attorney's Office. Since approximately April 2019, I have been assigned as lead investigator in this case. I have reviewed thousands of pages of statements, notes and reports compiled by New York State Police personnel. The statements contained in this Felony Complaint are based upon information provided by members of the New York State Police, either orally or in written

reports, other members of law enforcement, various telephone company records, as well as my experience and training as an Investigator with the New York State Police. Throughout this Felony Complaint, I have set forth the contents of conversations that I and/or other law enforcement officers involved in this investigation have had with witnesses who have assisted in the investigation. I have provided the sum and substance of those communications, but not necessarily exact quotes. The State Police investigation spanned over 20 years, not all facts learned from this investigation are contained hereinafter, including additional supporting information against Edward Holley, and supporting information regarding the involvement of "Suspect # 2," (who died in 2010), who was present in the vehicle when the victim was murdered.

1. On March 9, 2003, at 1:24am, the victim received a voicemail from a male voice who stated, "*Yo, I just drove by your crib, and I seen he was there. Holler back at me when you get this message...Easy.*" Loud music could be heard playing in the background. The victim subsequently saved the voicemail.

2. On March 10, 2003, the victim over drafted her HSBC bank account by -\$869.92. According to the victim's bank statements, this was the first time the victim over drafted her account.

3. On March 10, 2003, the victim and Edward Holley were involved in an argument. This information was gathered through Edward Holley's four New York State Police interviews as well as witness statements.

4. On March 13, 2003, at approximately 9:00am, the victim's landlord, Witness # 1, heard a male subject in the downstairs apartment with the victim on Karen Drive, in the

Town of Wallkill. Witness # 1 saw the victim leave a short time later. The male subject was later identified as Witness # 2, the victim's new boyfriend.

5. On March 13, 2003, at approximately 10:00am, Witness # 2 advised that the victim dropped him off at his residence, located on Sheffield Drive, in the Town of Wallkill. Witness # 2 advised that this was the last time that he saw the victim.

6. On March 13, 2003, at approximately 10:30am, the victim arrived for her shift at the American Café, located at 1 North Galleria Drive, Town of Wallkill. The victim worked her shift until 3:00pm. The victim was scheduled to work the following day (3/14/03) at noon but never arrived.

7. On March 13, 2003, at approximately 3:32pm, the victim deposited \$1158.33 into her bank account at HSBC Bank in the Town of Wallkill.

8. On March 13, 2003, at approximately 4:30pm, co-worker and friend, of the victim, Witness # 3, left the victim's new apartment, located on Karen Drive, after ensuring that the cable was turned on. Witness # 3 advised that the victim had not returned home from work at this time.

9. On March 13, 2003, at approximately 7:00pm, the victim pulled her vehicle up to a residence on Greenway Terrace, in the Town of Wallkill and had a conversation with Witness # 4 and Witness # 5, who were standing outside of her vehicle. Witness # 4 and Witness # 5 tried to convince the victim to come inside of the residence on Greenway Terrace where they were having a birthday party for Witness # 4. According to Witness # 5, in his May 3, 2022, interview, the victim advised that she was going to go hang out with

“Middletown people” and advised that she did not want to come inside because Edward Holley was present at the party on Greenway Terrace.

10. On March 13, 2003, at approximately 7:30pm, the victim arrived at Witness # 6’s residence, located on Crescent Place, in the City of Middletown. While at Witness # 6’s residence, the victim made numerous phone calls attempting to acquire marijuana.

11. On March 13, 2003, at 10:48pm, the victim contacted Witness # 3, from Witness # 6’s landline, in attempt to acquire marijuana. When the victim called Witness # 3, she was at the party, located at a residence on Greenway Terrace, in the Town of Wallkill with Edward Holley.

12. On March 13, 2003, at 10:57pm, the victim contacted Witness # 7, in attempt to acquire marijuana.

13. On March 13, 2003, at 11:25pm, the victim contacted Witness # 7, in attempt to acquire marijuana. Witness # 7 advised that he could not acquire marijuana for her.

14. On March 14, 2003, at approximately 12:00am the victim left Witness # 6’s residence. According to Witness # 6, the victim advised that she was going to go straight home to her new apartment located on Karen Drive because she had to work the next day. This is the last time that Witness # 6 saw the victim.

15. On March 14, 2003, at approximately 12:05am, Witness # 8 observed the victim at the ATK Gas Station, located at 151 Wisner Avenue, in the City of Middletown. Witness # 8 observed the victim enter the ATK gas station as he was walking out and heard her ask the clerk for a “Dutch.” Witness # 8 advised that he observed the victim’s white Mercury

Sable but did not notice if someone else was in the vehicle. A "Dutch" is a cigar commonly used in conjunction to smoke marijuana.

16. On March 14, 2003, at approximately 12:15am, Witness # 3 and Witness # 9 were leaving Witness # 4's party at a residence on Greenway Terrace and observed the victim pull up in her vehicle in front of the party. Witness # 3 had a short conversation with the victim at which point the victim advised that she was going to go smoke a "blunt."

17. On March 14, 2003, at approximately 12:17am, Witness # 3 and Witness # 9 observed the victim drive her vehicle down Cindy Lane, from Greenway Terrace, in the Town of Wallkill.

18. On March 14, 2003, at 12:20am, the victim's phone made its last outgoing phone call to Witness # 10, a previous boyfriend, and the brother of Witness # 6. The call went straight to voicemail and no message was left.

19. The cellular phone records of the victim reveal a series of six phone calls from Suspect # 2's cell phone which began during the late evening hours of March 13, 2003, to shortly after midnight on March 14, 2003. The victim received the sixth and final call from Suspect #2's cell phone at 12:20am on March 14, 2003.

20. On March 14, 2003, at approximately 12:25am, Suspect # 2 (who died in 2010) advised that the victim pulled up in front of his residence, located on Cindy Lane, in the Town of Wallkill, at which point he got into the front passenger's seat of her vehicle. Suspect # 2 advised that he told the victim that he did not have marijuana for her at which point she advised that she was going to be acquiring marijuana from Edward Holley, according to Suspect # 2's February 16, 2010, interview.

21. Witness #11 stated that on March 14, 2003, at approximately 12:30am, she observed the victim's white Mercury Sable driving through the Kensington Manor complex in the Town of Wallkill being followed by a dark colored Honda Civic hatchback with a loud sound system.

22. On March 14, 2003, at approximately 8:00am, Witness # 12 observed the victim's white Mercury Sable parked in the Kensington Manor parking lot, near building 14.

23. On March 14, 2003, at approximately 9:00am Witness # 13 observed the victim's white Mercury Sable parked in the Kensington Manor parking lot, near building 14.

24. On March 14, 2003, at approximately 10:00am Witness # 14 observed the victim's white Mercury Sable parked in the Kensington Manor parking lot, near building 14.

25. On March 14, 2003, at approximately 2:00pm Witness # 15 observed the victim's white Mercury Sable parked in the Kensington Manor parking lot, near building 14.

26. Throughout the day on March 14, 2003, family and close friends of the victim left numerous voice messages on the victim's cell phone in which they voiced their concern for the victim's safety and her whereabouts.

27. Based upon witness interviews in the case, detailed below, it was established that the victim was killed between approximately 12:30am on March 14, 2003, and 8:00am on March 14, 2003.

28. On March 15, 2003, at approximately 1:15pm, Witness #16 and Witness #17, discovered the body of a deceased female on a dirt path off Bowser Road, in the Town of Wallkill, County of Orange, State of New York.

29. On March 15, 2003, members of the New York State Police Forensic Identification Unit processed the scene and located personal property on the victim consisting of a New York State driver's license in the name of Megan McDonald. The victim was subsequently identified as 20-year-old female, Megan McDonald, of the Town of Wallkill in Orange County, New York, hereinafter referred to as "the victim."

30. On March 15, 2003, New York State Police conducted a check of the New York State Department of Motor Vehicles for any registered vehicles in the name of the victim. The search revealed that a 1991 Mercury Sable, four door sedan, color white, was the sole vehicle registered to the victim. The local media was subsequently notified that the New York State Police were attempting to locate the victim's vehicle, which included a description of the victim's vehicle.

31. On March 16, 2003, Forensic Pathologist Doctor Michael Sikirica conducted an autopsy of the victim at Kingston Hospital. The autopsy determined the official cause of death was multiple skull fractures and brain injuries due to blunt force trauma.

32. On March 17, 2003, Witness #18, who resided in the Kensington Manor apartment complex, contacted the New York State Police, and advised that she located the victim's 1991 Mercury Sable, four door sedan, color white, in the parking lot of the Kensington Manor complex. State Police responded and Troopers observed the victim's vehicle in a parking spot near building #14, facing a westerly direction. A neighborhood

canvass revealed that Witness # 12, Witness # 13, Witness # 14, and Witness # 15, observed the vehicle in the same parking spot throughout the day on March 14, 2003.

33. On March 17, 2003, the victim's white 1991 Mercury Sable was secured and towed back to Troop F Headquarters, where it was processed by the New York State Police Forensic Identification Unit, which included DNA analysis. The forensic processing of the victim's vehicle was consistent with a vicious assault where the assailant used repeated blows to the head with a hand-held weapon. This evidence suggested that the victim was apparently struck with a blunt object while in the driver's seat of her vehicle.

34. A thorough review of the evidence in this investigation resulted in Edward Holley being identified as the suspect in the murder of Megan McDonald. The following facts demonstrate, Holley had a clear motive to commit the homicide.

35. Edward Holley owed the victim a substantial amount of money that was causing hostility between the two leading up to the homicide.

In May of 2002, the victim started receiving \$1250 per month from her deceased father's NYPD pension. The victim also had a job at the American Café and was known to be financially responsible. However, on March 10, 2003, the victim over drafted her HSBC bank account by -\$869.92. According to the victim's bank statements, this was the first time she over drafted her account. On the day prior to the homicide, the victim's bank account was \$21.92, at which point she deposited \$1158.33. In three of Edward Holley's New York State Police interviews on March 16, 2003, June 17, 2008, and March 18, 2019, Holley mentioned that he owed the victim money, but advised that it was only \$300. Holley further advised that this money was for a vehicle that the victim helped him purchase. The investigation revealed that this vehicle was a 1990 purple Honda Civic hatchback. However, Witness # 2, in his May

3, 2022 interview, stated that shortly before the homicide, the victim told him that Holley owed her \$3000 for the vehicle that she helped him purchase and he was not paying her back. Witness # 2 further advised that several days before the murder, the victim pointed this vehicle out to him while Holley was driving it. Witness # 2 described this vehicle as a smaller hatchback. Witness # 2 stated that Holley's refusal to pay the victim back, caused the victim to be upset with Holley several days prior to the homicide. Witness # 2 advised that the victim told him that the money Holley owed her was from her deceased father's NYPD pension.

36. The victim and Edward Holley were involved in a romantic relationship, and she attempted to end their relationship several days before the murder.

The interviews and evidence in this case show that Edward Holley and the victim were involved in an intimate partner relationship leading up to several days prior to the murder. In Holley's State Police interviews as well as controlled conversations with Witness # 19, he advised that he had an argument with the victim several days prior to the homicide. Although the reasoning for this argument changes in all his State Police interviews, Holley consistently advised that he and the victim were involved in an altercation several days prior to the homicide which Holley claimed was the last time that he saw the victim. Holley also made several statements to Witness # 19 that the victim was the one who attempted to end their relationship. The victim's Sprint cellular call detail phone records reveal that from the invoice period of February 25, 2003, until March 24, 2003, the victim called Holley's pager number daily from February 25, 2003, until March 11, 2003, for a total of 43 times. The final call from the victim's cell phone to Holley's pager number was on March 11, 2003, at 8:16pm. In my experience in investigating crimes of domestic violence, it is not uncommon for individuals who have recently engaged in an

altercation or fight to suddenly stop communication that had previously been frequent. The evidence in this case leads to the inference that Holley and the victim did engage in a domestic altercation just several days prior to her murder after which the victim stopped communicating with Holley.

37. The victim was looking to acquire marijuana just prior to her murder and Edward Holley was the victim's main marijuana supplier.

In Holley's State Police interviews as well as controlled conversations with Witness # 19, Holley advised that he was the victim's main marijuana supplier and that they smoked marijuana every day. On the evening of March 13, 2003, the victim was attempting to acquire marijuana and Edward Holley was the victim's main marijuana supplier. However, on the evening of March 13, 2003, the victim was attempting to avoid speaking with Holley due to the recent domestic altercation and ending of their relationship just two days prior on March 11, 2003. Interviews in this case establish that on March 13, 2003, the victim attempted to acquire marijuana from other individuals who she would not normally acquire marijuana from, all with negative results. Witness #8 advised that on March 14, 2003, at approximately 12:05 AM, he heard the victim order a "Dutch" cigar, commonly used to smoke marijuana, from the clerk at the ATK gas station on SR 211. Witness # 3 stated that on March 14, 2003, at approximately 12:15am, the victim told her she was going to smoke marijuana and observed the victim traveling down Cindy Lane from Greenway Terrace. Suspect # 2 stated that the victim then stopped in front his house on Cindy Lane and told him that she was going to be acquiring marijuana from Edward Holley. These interviews lead to the inference that as a last resort, the victim acquired or intended to acquire marijuana from Holley shortly after her last outgoing call at 12:20am.

38. The victim and Edward Holley were both last observed in the same area of Scotchtown (Town of Wallkill) just prior to the murder.

The evidence shows that Edward Holley was at Witness # 4's party, located at a residence on Greenway Terrace on March 13, 2003, and then left the area of Greenway Terrace just prior to midnight. The evidence also shows that the victim left Witness # 6's residence just before midnight on March 13, 2003, and was observed driving her Mercury Sable in the area of Greenway Terrace just after midnight on March 14, 2003. The victim's cell phone tower records also indicate that she was in the area of Scotchtown (Town of Wallkill) during the timeframe when she picked her killer up in her vehicle. During interviews with State Police, Holley revealed that he was aware that the victim was outside of the party on Greenway Terrace the night of the murder. These interviews along with the cell phone tower records of the victim's cell phone establish that the victim and Holley were in the same general area on the night of the murder. In Holley's March 18, 2019, interview he advised that immediately after the party, he drove his purple Honda Civic hatchback back to his residence at 66 Sandberg Court, in the Town of Wallkill. In an interview with Witness #28 on March 18, 2019, she stated that during the timeframe of the homicide, Holley drove a purple Honda Civic with a loud sound system. In a follow up interview with Witness # 11, on October 1, 2020, she articulated that on the night of the murder, she observed the victim's 1991 white Mercury Sable driving through the Kensington Manor apartment complex being followed by a dark colored Honda Civic hatchback with an extremely loud sound system. An interview with the previous owner of the purple Honda Civic Hatchback, Witness # 20, on December 4, 2020, revealed that the Honda Civic had a Kenwood sound system in it, which he installed. Witness # 20 advised

that the sound system in the Honda Civic made it the “*loudest car in town.*” Further investigation revealed that during the timeframe of the murder, Holley operated a 1990 Honda Civic hatchback, color purple, which was registered to his mother. These developments regarding the purple Honda Civic hatchback led to the inference that Holley and the victim were together in the area of Kensington Manor just prior to the homicide.

39. In January of 2023, New York State Police Lieutenant Brad Natalizio and Investigator Michael Corletta began receiving investigative assistance from a private company, CyberCheck, in reference to this case. After conducting an analysis of case information, CyberCheck was able to place the cellular devices of Megan McDonald, Edward Holley, and Suspect # 2 together at key locations on the night of the homicide. This information provided by CyberCheck, corroborated the abovementioned investigative timeline.

40. The victim went to the isolated spot where she was killed for a reason and with someone who specifically knew the location.

41. The crime scene examination determined that the victim was killed in the driver’s seat of her 1991 Mercury Sable and her body was dumped where she was ultimately located on the dirt path off Bowser Road in the Town of Wallkill. The investigation determined that Suspect #2 was familiar with the location and that he was granted permission to hang out there by the property owner, Witness # 21. This location is approximately 4.8 miles from the area where the victim was last seen and 4.7 miles from the victim’s apartment. Interviews in this case established that the victim just started dating Witness # 2, and that Witness #2 slept over at the victim’s apartment in the nights leading up to the homicide. These nights are consistent with the nights in which the victim had no

phone contact after the apparent domestic altercation with Holley. It is also conceivable that the victim would not want to bring Holley back to her apartment because of her new relationship with Witness # 2.

42. Based on my training and experience, the blunt force trauma that the victim sustained was a result of an “expressive homicide.” Facts of this case and details of the crime scene, reveal that the murder of the victim was an “expressive homicide,” or extreme physical attack. The fundamental characteristic of an expressive homicide is an intimate personal relationship between the victim and offender. The intensity of emotion that will inevitably characterize murders within an intimate relationship will tend to produce explosive violence. The explosive violence was clear in this homicide as the victim sustained violent blows to her head and face. When murders are committed by an intimate partner, the victim typically sustains greater injury, classified as “overkill.” Homicides by intimate partners are often preceded by a recent separation or attempt to separate. Five days before the homicide on March 9, 2003, at 1:24am, the victim received a disturbing voicemail stating “yo...*I just drove by your crib and seen he was there. Holler back at me when you get this message...easy.*” The male voice on that voicemail was positively identified as Edward Holley in May of 2022, by Witness # 5, Witness # 22, Witness # 23, Witness # 24, and Witness # 25. The date of this voicemail would have been consistent with the victim’s new boyfriend, Witness # 2, spending the night at the victim’s residence. The interviews and evidence in this case establish that Edward Holley and the victim were involved in an intimate partner relationship leading up to several days prior to the murder, at which point the victim attempted to end their relationship. Evidence shows at the time of the murder, Edward Holley was also involved in many other physical relationships with

multiple women, but Holley was infatuated with the victim. In Holley's interviews, he made it clear that he did not get along with the victim's ex-boyfriend, Witness #10, which implies that Holley was possessive and jealous in nature. In Holley's March 18, 2019, interview, he made it clear that he did not like the victim hanging out with Witness #6 (sister of Witness #10), due to his jealousy of Witness #10 (the victim's ex-boyfriend). In Holley's March 18, 2019, interview with New York State Police, Holley advised that he lectured the victim not to hang out with Witness #6 because it put him in a bad spot. Evidence in this case reveals that just prior to her murder, the victim was hanging out with Witness #6. On March 14, 2003, at 12:20am, the victim's last outgoing call from her cell phone was to the cell phone of Witness #10 (the victim's ex-boyfriend).

43. On June 30, 2021, New York State Police Investigator Brad Natalizio received the Cybergenetics TrueAllele computer analysis of the DNA evidence which revealed that Megan McDonald's DNA and Edward Holley's DNA are associated in an inclusionary manner with swabs from victim's cell phone which was recovered from inside the victim's vehicle. It is likely that Holley went through the victim's cell phone and observed the victim's outgoing call to Witness #10 (the victim's ex-boyfriend), causing Holley to go into a rage. On March 16, 2023, New York State Police Lieutenant Brad Natalizio and Investigator Michael Corletta received the Cybergenetics TrueAllele computer analysis of the DNA evidence which revealed that DNA obtained from the rear driver's seat of McDonald's vehicle and Edward Holley's DNA are associated in an inclusionary manner. Evidence in this case reveals that the victim was murdered in the driver's seat of her vehicle.

44. At the time of the murder, Edward Holley resided at 66 Sandberg Court in the Town of Wallkill. Holley's residence was located approximately 500 feet from where the victim's vehicle was abandoned in the Kensington Manor parking lot. Furthermore, the victim's car was observed in the parking lot by a Kensington Manor resident, Witness # 12, at approximately 8:00am on March 14, 2003. Evidence shows that during the time frame of the murder, Edward Holley, who neglected to provide his address in his first State Police interview on March 16, 2003, was residing at 66 Sandberg Court, Middletown, NY 10941. Interviews with multiple subjects revealed that they would purchase marijuana from Holley by parking either in Kensington Manor or on Freezer Road and walking through a wooded area to the rear of 66 Sandberg Court, which led directly to Holley's room on the first floor. In Holley's March 18, 2019, interview, he advised that after the party he drove directly back to his residence at 66 Sandberg Court, in his purple Honda Civic hatchback, where he lived on the first floor. The rear door to 66 Sandberg Court is approximately 500 feet from where the victim's vehicle was left abandoned. The victim's vehicle was parked in Kensington Manor for three days after the homicide. Holley would have been able to clearly see the victim's distinct white Mercury Sable every time he exited his residence at 66 Sandberg Court, and he remained silent.

45. Edward Holley provided numerous contradictory stories and alibis, and each was disproved by several witnesses. Edward Holley's four separate interviews with the State Police as well as the three controlled conversations that he had with Witness #19, demonstrate contradictions regarding his whereabouts on the evening of March 13, 2003 and the early morning hours of March 14, 2003; the time frame in which the victim was murdered. Interviews with Witness #3, Witness # 4, Witness # 5, Witness # 22, Witness #

26, Witness # 27, and Witness # 29 also contradict Holley's statements during his State Police interviews regarding his whereabouts during the specific time of the murder. Holley also provided numerous alibis for the night of the murder, which have all been proven false. Holley also provided conflicting stories regarding where he last saw the victim, the reasoning for their argument, and the vehicle that he was driving on the night of the murder. DNA and Cyber Data also disprove all of Holley's accounts. Holley also made numerous unexplainable admissions and statements during his State Police interviews and controlled conversations with Witness #19 to include information that only the killer would know that was not previously released to the public. In Holley's March 18, 2019, interview with New York State Police, he articulated that the next morning after the party at a residence on Greenway Terrace, he woke up to a phone call in which he was notified that "*they found Megan.*" This notification of her death was articulated as only hours after she was last observed alive. This is a differing set of accounts from the victim's close family and friends who described her as "missing," (for over 40 hours), which created extreme panic. The victim was never "missing" to Holley. Holley also described and appeared to re-live the homicide consistent with physical evidence, in his interviews with the State Police on March 18, 2019, when asked how he thought she was killed. Holley also attempted to direct and guide Witness #5, Witness # 19, and Witness #25 to not cooperate with the State Police investigation.

46. Based on my review of the records associated with this case, numerous interviews, and my experience as a law enforcement professional, there is probable cause that on March 14th, 2003, Edward V. Holley did intend to cause the death of another person, Megan McDonald, and he did in fact cause the death of such person.

Notice: Any person who knowingly makes a false statement in a written instrument such as this Felony Complaint and 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 pursuant to Penal Law §210.45.



Michael Corletta
Investigator
New York State Police

Dated: April 19, 2023

Town of Wallkill, New York