#### THE PEOPLE OF THE STATE OF NEW YORK

-against-

Indictment No. 70670-23/001 Index No. 25561

TIARA K. ALLEN

. .

Defendant.

#### First Count

THE GRAND JURY OF ST. LAWRENCE COUNTY, by this Indictment, accuse the above defendant, TIARA K. ALLEN, of the crime of MURDER IN THE SECOND DEGREE, in violation of Penal Law § 125.25 (4), as a Class A-I Felony, committed as follows:

The defendant, in the Town of Fowler, St. Lawrence County, New York State, on or about July 7, 2023, under circumstances evincing a depraved indifference to human life, and being eighteen years old or more she recklessly engaged in conduct which created a grave risk of serious physical injury or death to another person less than eleven years old and thereby caused the death of another such person.

# Second Count

THE GRAND JURY OF ST. LAWRENCE COUNTY, by this Indictment accuse the above defendant, TIARA K. ALLEN, of the crime of ASSAULT IN THE FIRST DEGREE, in violation of Penal Law § 120.10 (3) a Class B Felony, committed as follows:

The defendant, in the Town of Fowler, St. Lawrence County, New York State, on or about July 7, 2023, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused serious physical injury to another person.

## Third Count

نې د .

THE GRAND JURY OF ST. LAWRENCE COUNTY, by this Indictment accuse the above defendant, TIARA K. ALLEN, of the crime of MASLAUGHTER IN THE SECOND DEGREE, in violation of Penal Law § 125.15 (1) a Class C Felony, committed as follows:

The defendant, in the Town of Fowler, St. Lawrence County, New York State, on or about July 7, 2023, did recklessly cause the death of another person.

# Fourth Count

THE GRAND JURY OF ST. LAWRENCE COUNTY, by this Indictment, accuse the above defendant, TIARA K. ALLEN, of the crime of RECKLESS ASSAULT ON A CHILD, in violation of Penal Law § 120.02, as a Class D Felony, committed as follows:

The defendant, in the Town of Fowler, St. Lawrence County, New York State, on or about July 7, 2023, being eighteen years of age or more, recklessly caused serious physical injury to the brain of a child less than five years old by shaking the child, or by slamming or throwing the child so as to impact the child's head on a hard surface or object.

# Fifth Count

THE GRAND JURY OF ST. LAWRENCE COUNTY, by this Indictment, accuse the above defendant, TIARA K. ALLEN, of the crime of ENDANGERING THE WELFARE OF A CHILD, in violation of Penal Law §260.10 (1) a Class A Misdemeanor, committed as follows:

The defendant, in the Town of Fowler, St. Lawrence County, New York State, on or about July 7, 2023, knowingly acted in a manner likely to be injurious to the physical, mental or moral welfare of a child less than seventeen years old.

Dated: November 17, 2023

FOREPE

Gary M. Pasqua District Attorney St. Lawrence County

RECEIVED
No. <b>2 1</b> 2023
ST. LAWRENCE COUNTY CLERKIS OFFICE