

**JUSTICE COURT
TOWN OF TONAWANDA, NEW YORK**

State of New York

County of Erie

Town of Tonawanda

THE PEOPLE OF THE STATE OF NEW YORK

-vs-

**Ryan T. Flynn
307 Fillmore Ave
Tonawanda, NY 14150**

**Complaint Number: 25-550380
Date of Birth: 10/26/1993
Phone Number: (716) 275-0420**

INFORMATION/COMPLAINT

I, Det. Robert Kubus, the complainant herein, accuses the above named defendant with having on or about, Octboer 15th, 2025 at, 56 Quaker Ridge, in the Town of Tonawanda, County of Erie, New York at about, 10:30 PM with having committed the offense of **Criminal Contempt in the 1st Degree** in violation of section **215.51-(b)(i)** of the Penal Law in the State of New York, the same being a **Class "E" Felony**.

FACTS: A person is guilty of criminal contempt in the first degree when: in violation of a duly served order or protection, or such order of which the defendant has actual knowledge because he or she was present in court when such order was issued, or an order or protection issued by a court of competent jurisdiction in this or another state, territorial or tribal jurisdiction, he or she; intentionally places or attempts to place a person for whose protection such order was issued in reasonable fear or physical injury, serious physical injury or death by displaying a deadly weapon, dangerous instrument or what appears to be a pistol, revolver, rifle, shotgun, machine gun or other firearm or by means of threat or threats, to wit: At the aforementioned date, time and place, **the defendant threatened to murder John Flynn's wife, Debra Flynn, placing her in fear of death, in violation of a stay away order of protection issued to the defendant in court by Hon. J. Mark Gruber on September 18th, 2025, and made valid through March 19th, 2026.** All contrary to the provisions of the statute in such case made and provided.

THE AFORESAID ALLEGATIONS OF FACT ARE MADE BY THE COMPLAINANT HEREIN ON DIRECT KNOWLEDGE AND UPON INFORMATION AND BELIEF, WITH THE SOURCE BEING: supporting deposition of Debra Flynn, copy of order of protection issued September 18th, 2025, by Hon J. Mark Gruber, printout of screen shot from Twitter/x account "John flynn @needmorehaters1"

Affirmed under penalty of perjury, Thursday, October 16, 2025


Det. Robert Kubus, Complainant

**NOTE: FALSE STATEMENTS MADE HEREIN ARE
PUNISHABLE AS A CLASS "A" MISDEMEANOR
PURSUANT TO SECTION 210.45 OF THE REVISED
PENAL LAW OF NEW YORK STATE.**

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Prepared By: Krier # 503