

COURT OF APPEALS OF UTAH

State v. McManigal

McManigal, 2025 UT App 192 (Utah Ct. App. 2025) · No. 20230917-CA · Decided December 26, 2025

SUMMARY

The Utah Court of Appeals affirmed Ryan Lynn McManigal’s convictions for six counts of possessing a weapon of mass destruction. The court held that conventional explosives may qualify as weapons of mass destruction under Utah law when designed or intended to cause widespread death or serious bodily injury to multiple victims, and that sufficient evidence supported the convictions. The court also rejected McManigal’s plain-error challenge to the jury instruction and declined to address his ineffective-assistance claim because he did not establish deficient performance.

CASE DETAILS

COURT	Court of Appeals of Utah
WRITING FOR THE COURT	Gregory K. Orme; Ryan M. Harris; John D. Luthy
JURISDICTION	Utah Court of Appeals
DECIDED	December 26, 2025
DOCKET	20230917-CA
DISPOSITION	affirmed
PROCEDURAL POSTURE	McManigal appealed his convictions on six counts of possession of a weapon of mass destruction after the district court denied his motion for a directed verdict and the jury convicted him on six of nine WMD counts.
STANDARD OF REVIEW	The denial of a directed-verdict motion is reviewed for correctness. Statutory interpretation is reviewed for correctness. Sufficiency challenges to denial of a directed verdict receive highly deferential review, with the ruling upheld if, viewing the evidence in the light most favorable to the State, some evidence supports a finding beyond a reasonable doubt. Plain-error and ineffective-assistance claims present questions of law reviewed for correctness.
PRECEDENTIAL VALUE	Published and precedential
PARTIES	Ryan Lynn McManigal v. State of Utah

TOPICS

criminal procedure

statutory interpretation

jury instructions

appellate procedure

standard of review

PRACTICE AREAS

Criminal law

Criminal procedure

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Evidence and jury instructions

QUESTIONS PRESENTED

1. Whether conventional explosives and associated ignition devices may qualify as weapons of mass destruction under Utah Code section 76-10-401(6)(a)(i).
2. Whether sufficient evidence supported a finding that the TATP and devices were designed or intended to cause widespread death or serious bodily injury to multiple victims.
3. Whether the jury instruction defining a weapon of mass destruction constituted plain error because it did not define "widespread" or include all statutory WMD categories.
4. Whether trial counsel was ineffective for failing to object to the WMD jury instruction.

HOLDINGS

1. Utah Code section 76-10-401(6)(a)(i) defines a standalone category of weapon of mass destruction that can include conventional explosives when they are designed or intended to cause widespread death or serious bodily injury to multiple victims.
2. The evidence was sufficient for a reasonable jury to find beyond a reasonable doubt that the TATP and associated devices were designed or intended to cause widespread death or serious bodily injury to multiple victims.
3. The jury instruction did not constitute plain error because subsection 401(6)(a)(i) is a standalone WMD category, "widespread" has an ordinary meaning that need not be defined for the jury, and the omitted statutory categories were not at issue.
4. The ineffective-assistance claim was not addressed on the merits because McManigal did not argue or establish deficient performance, an essential element of the claim.

KEY QUOTATIONS

"For these reasons, we conclude that based on the plain language of the relevant statutes, subsection 401(6)(a)(i) defines a standalone variant of a WMD that could include "conventional explosives" in certain circumstances, specifically, when such explosives are "designed or intended to cause widespread death or serious bodily injury to multiple victims."" (¶ 26)

"In sum, we reject McManigal's claims of error relating to Instruction 42. Accordingly, the trial court did not plainly err in providing that instruction to the jury." (¶ 35)

FACTUAL BACKGROUND

Police obtained a warrant to search McManigal's home after threats, statements about being heavily armed, and protective orders prohibiting him from possessing weapons. During the ensuing standoff, McManigal fired shots at police. Officers later found TATP, MEKP, and seven ignition-type devices in the residence; experts testified

that the explosives and devices were highly unstable and capable of causing widespread death or serious bodily injury. The explosives required evacuation of approximately 600 people and were later detonated under controlled conditions.

PROCEDURAL HISTORY

McManigal was charged in the Third District Court, Salt Lake Department, with nine first-degree-felony counts of possession or use of a weapon of mass destruction, arising from explosives and ignition devices found in his residence. The district court denied his directed-verdict motion. The jury convicted him on six counts and acquitted him on three. On appeal, he challenged the sufficiency and statutory basis for the convictions and argued that the jury instruction defining a WMD constituted plain error and that trial counsel was ineffective. The Utah Court of Appeals rejected the arguments and affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Amboh, 2023 UT App 150, 541 P.3d 299
- State v. Gonzalez, 2015 UT 10, 345 P.3d 1168
- State v. Francis, 2012 UT App 215, 284 P.3d 720
- State v. Hawkins, 2016 UT App 9, 366 P.3d 884
- State v. Samora, 2022 UT App 7, 504 P.3d 195
- McKittrick v. Gibson, 2024 UT 1, 541 P.3d 949
- Turner v. Staker & Parson Cos., 2012 UT 30, 284 P.3d 600
- Brindley v. Logan City, 2023 UT App 46, 530 P.3d 557
- Oliver v. Utah Labor Comm'n, 2017 UT 39, 424 P.3d 22
- State v. Bagnes, 2014 UT 4, 322 P.3d 719
- Larry H. Miller Theatres, Inc. v. Utah State Tax Comm'n, 2024 UT 8, 545 P.3d 266
- Jensen v. Intermountain Healthcare, Inc., 2018 UT 27, 424 P.3d 885
- State v. Johnson, 2017 UT 76, 416 P.3d 443
- State v. Moore, 2025 UT App 26, 566 P.3d 69
- State v. Frausto, 2002 UT App 259, 53 P.3d 486
- State v. Ekstrom, 2013 UT App 271, 316 P.3d 435
- Allen v. Friel, 2008 UT 56, 194 P.3d 903