

**SEALED** 3:24-mj-00267

DISTRICT OF OREGON, ss:

AFFIDAVIT OF Jennifer Duke

**Affidavit in Support of a Criminal Complaint and Arrest Warrant**

I, Jennifer Duke, being duly sworn, do hereby depose and state as follows:

**Introduction and Agent Background**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since September 2021. My current assignment is to the Portland Division, Pendleton Resident Agency. I received 21 weeks of training at the FBI Academy in Quantico, Virginia, where I learned about investigating violations of federal law, including violent crimes. My responsibilities include the investigation of federal criminal offenses, to include robbery, firearms violations, and assault, violent crimes, sex crimes, and crimes on the Confederated Tribes of the Umatilla Indian Reservation (CTUIR). Before joining the FBI, I investigated Counterintelligence threats for the Department of Defense. During the course of my employment as an FBI agent, I have participated in multiple investigations involving firearm offenses, violent crime, interstate threats, and child exploitation matters. I have interviewed subjects, participated in search warrants, collected, and reviewed evidence including with electronic devices, analyzed electronic devices, location data, requested legal process, and testified before grand jury and in open court.

2. I submit this affidavit in support of a criminal complaint and arrest warrant charging **Eduardo SANCHEZ**, date of birth XX/XX/1985, with violations of 18 U.S.C. § 875(c) – Interstate Communications with a Threat to Injure. As set forth below there is probable cause to believe that **SANCHEZ** committed the crime of Interstate Communications with a Threat to Injure.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

#### **Applicable Law**

4. *Title 18, United States Code § 875(c)* makes it unlawful to knowingly transmit in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another.

#### **Statement of Probable Cause**

##### **Summary**

5. On November 25, 2024, Pendleton [Oregon] Police Department (PPD) responded to a report of multiple telephonic threats made by **SANCHEZ** toward an Oregon Department of Justice (ODOJ) employee, Adult Victim, or AV, who serves as the child support enforcement case worker for **SANCHEZ**. As a result of the voicemails left by **SANCHEZ**, the entire Oregon DOJ building, which houses several state agencies, was placed in lockdown for two days. After reviewing the voicemail recordings of the telephonic threats, PPD referred the case to the FBI.

##### **Background**

6. Sanchez was previously ordered to pay child support pursuant to an out of state child support judgment. An Oregon child support case was opened following a request to modify the child support filed by **SANCHEZ**'s ex-wife and **SANCHEZ** was assigned a case worker with the Oregon Department of Justice in December 2023. The modification request proceeded

through the court and administrative system in 2024. **SANCHEZ** was served with a proposed modification order and in turn he requested a hearing to contest the amount. Following **SANCHEZ**'s failure to appear (telephonically) at the scheduled hearing, a finalized order modifying the child support award was entered in approximately September of 2024. The modification resulted in an increased monthly support payment of almost \$500.

### **Threatening Communications**

7. On Saturday, November 23, 2024, **SANCHEZ** made eight phone calls and left a total of six voicemails at the Oregon Department of Justice's Division of Child Support office in Pendleton, Oregon. The messages were retrieved on Monday, November 25, 2024, by Adult Witness 1, or AW1. The messages were forwarded to the Pendleton Police Department, and soon after to the FBI.

8. On December 2, 2024, I listened to the voicemail recordings, all made from phone number XXX-XXX-3015, and noted the below:

- **Call 1:** 2:34 minutes:
  - :20 - *"Your boss, your manager, has intentionally fucked my case up. So I'm coming to you guys' office."*
  - :30 - *"So I'm going to get my car running. I'm going to come to your office. And I'm going to murder everyone."*
  - 1:01 - *"I'm going to shoot you guys."*
  - 1:30 - *"You guys have fucked up my case over and over. I have told [AV]."*
  - 2:09 - *"I'm going to be at y'all's office [inaudible] and I'm going to be shooting you guys."*
  - 2:33 - *"Ill see you soon."*
- **Call 2:** 2:38 minutes:
  - :05 - *"My name is Eduardo Sanchez. And the last four of my social is 5900."*
  - :33 - *"Within the next 24 hours, I'm gonna fix my car here, and I'm probably coming to your office and I'm probably gonna fuck you guys up."*
  - :46 - *"Because you guys have fucked up my life so much I'm coming to your office and fuck you guys up now."*
  - 1:00 - *"I'm either going to shoot you in your face or I'm going to fuck you up."*
  - 1:25 - *"I'm coming to your office now. You guys are about 30 minutes away from me."*

- 1:47 – *“The first thing I’m probably going to do is shoot her [AV] in her fucking face.”*
- 2:05 – *“Salem, Oregon sounds like a great place for me to stand there after murdering every single one of you and stand there.”*
- **Call 3** – 4:31 minutes:
  - :00 – *“Hi, this is Eduardo Sanchez, and I would appreciate if [AW3] would call me back.”*
  - :36 – *“I’m about to come in your office and shoot you guys in your fucking face. Like I don’t know how to say that in a nice way, but if I’m going to be homeless, Imma come to your office and I’m gonna murder every single fuckin’ one of you.”*
  - 2:08 – *“I’m coming to your office and I’m going to fuckin’ find [AV] and I’m going to pop off with her first, and then I’m going to pop off with the rest of you.”*
  - 3:25 – *“The first thing I’m gonna do is shoot you in your fuckin’ face. It cost 240 dollars for a fuckin’ handgun. I’m gonna go buy a handgun with my last paycheck because I’m gonna be homeless, right? So I’m gonna buy a handgun with my last paycheck and the first thing I’m doing is coming to your office, 30 miles away from me. You’re 30 miles away from me. I’m coming to your office and I’m gonna shoot you in the face. You understand that?”*
  - 4:07 – *“I’m coming to your office and I’m probably gonna shoot every single one of you there. I’m not gonna lie, I’m probably gonna take every single one of you out. I’ll see you guys soon. I’ll see you guys real soon. 35 miles away from me. Wow. You guys think your fuckin’ safe.”*
- **Call 4** – 19 seconds:
  - [inaudible] ... Eduardo Sanchez .... [XXX-XXX]-3015
- **Call 5** – 1:57 minute:
  - :07 – *“My case worker is [AV], she never returns my calls.”*
  - :19 – *“You guys have fucked up my case over and over again.”*
  - 1:20 – *“I’m going to shoot you in the fuckin’ face.”*
- **Call 6** – 1:57 minute:
  - :16 – *“You guys need to return my phone calls because if you guys don’t, I’m going to come to your office and I’m gonna fuckin’ shoot every single on of you in your fuckin’ face. That’s not an exaggeration.”*
  - :55 – *“I’m not dealing with this shit anymore. So you guys better fuckin’ figure it out how to resolve my account.”*
  - 1:36 – *“Because I’m going to shoot you in your fuckin’ faces. You stupid ass mother fuckers you guys are 30 minutes away from me. I’m getting my car fixed tomorrow, and I’m coming to your office and I’m gonna more than likely shoot every single one of you in your face. So figure out what you guys wanna do.”*

9. On December 8, 2024, I interviewed AV. AV has been assigned to **SANCHEZ**’s case since approximately December 2023, and is responsible for enforcing child support

services. AV reported that during the entirety of her time working with **SANCHEZ**, he would frequently call and leave angry messages to AV's work voicemail. AV could usually get **SANCHEZ** to "defuse" and calm down during the conversations, but over time, **SANCHEZ**'s calls and messages became angrier and more aggressive. AV explained that **SANCHEZ** received a proposed modification order for an increase in child support in the Fall of 2024. **SANCHEZ** had requested a hearing, and then failed to telephonically appear for the hearing. Administrative law judges dismissed **SANCHEZ**'s request, due to his failure to appear, and the modification order proposed by AV and the Department of Justice was finalized in approximately September 2024. Following the entry of the modified order, **SANCHEZ** began calling to yell and cuss at AV. In approximately mid-October 2024, AV decided AV could no longer work with **SANCHEZ**. AV suggested to AW1 that **SANCHEZ** should have a male case manager. AW1 called **SANCHEZ** to discuss his case, but **SANCHEZ** hung up on AW1. Near the end of October 2024, **SANCHEZ** was served with a denial of request form stating that **SANCHEZ** could no longer submit a request for modification unless a substantial change to his circumstances occurred.

10. On November 25, 2024, AW1 was the first to retrieve and listen to the above-described voicemails left by **SANCHEZ**. Adult Witness 2, or AW2, learned upon arrival to the building that Adult Witness 3, or AW3, who is the building manager for the Department of Administrative Services in Pendleton, Oregon, had locked the building down, which includes all external and interior doors being locked. Other state offices such as The Unemployment Department, Department of Child Welfare, The Department of Revenue, and several building code and water offices, which are housed in the state building, were also placed in locked down. Employees were told to work from home.

11. After AV was notified of the voicemail threats and the ODOJ building was placed in to lock down, AV further learned that AV's personal information was readily and publicly available on the internet, to include AV's current address. Out of significant fear for AV's personal safety, AV left the immediate area, and has not yet returned to AV's residence. AV is very afraid to go home and believes it is a matter of time before **SANCHEZ** is going to show up at AV's residence or work and carry out his threat. AV's employers have been working on a safety plan to allow AV to return to work.

12. On December 10, 2024, I interviewed AW2, who works at the Division of Child Support in Pendleton, Oregon. AW2 had been aware of **SANCHEZ**'s increased agitation and "rude" behavior. AW2 arrived to work late on November 25, 2024, after being told by AW1, "we have a situation can you come into the office." AW2 arrived after the building had been placed in locked down. AW2 observed the building across the street was also placed in locked down. AW2 noticed in **SANCHEZ**'s messages that he kept saying "he was a half hour away." AW2 knew there was a satellite office co-located with the Malheur County District Attorney in Ontario, Oregon. AW2 called that location to inform the court security of the threat. The Division of Child Support Services headquartered in Salem, Oregon, was also made aware of the threat. It was decided that all offices would remain closed the whole day of November 25, 2024, until **SANCHEZ** was located. All offices remained closed to the public through November 26, 2024. The other state offices located in the Pendleton DOJ building were impacted in providing services to the community, particularly those members of the community who rely on services for their benefits.

13. The Ontario [Oregon] Police Department (OPD) made contact with **SANCHEZ** in the afternoon of November 25, 2024. **SANCHEZ** acknowledged making the calls and

apologized to officers. OPD confirmed **SANCHEZ**'s phone number was XXX-XXX-3015 during their interaction.

14. On December 2, 2024, AW2 sent an email to **SANCHEZ** informing him that they *“will be conducting all interactions via email going forward. We will not be responding to your voicemails. If you have questions regarding your case, please email [AW1] and [AW2] with a list of your questions and we will respond in a timely manner.”*

15. Over the course of three days, **SANCHEZ** admitted to making the threats in various emails to AW1 and AW2 that read as follows:

**12/8/2024** – *Hi! My name is Eduardo Sanchez and again I'm requesting a hearing or paperwork to be sent to me for a hearing from people that have their hands in my pocket holding my dick. Hi. Asking again for the paperwork to be sent to me for a hearing. Hello. You see how my threat actually pushed my case worker out of my way though? You see how that benefitted me? No? Hi! This is a future message for the state courts. Hi! I am trying and currently in contact with the leads at your states child support office and they are still denying me a court date. Hi! Today is 12/8/2024. They are still denying me a court appearance on a case that you all fucked up. My actions are justified.*

**12/8/2024** – *You see now how your I appreciate case worker made this worse. This is what happens when you don't call someone back that you're taking money from. Use this as a training experience. Fire [AV] stupid ass. She NEVER called me back, she illegally verified my income. Cause it's illegal to falsely verify when it deals with someone's life. See how it caused this? Fire her. I have so little trust in you that I went so far as to make threats. That is 100 on your office and I'll make that known to the judge. You refused to call me back and it lead to this. FIRE [AV]! I'll soon be posting this throughout Oregon*

*with [AV]'s picture to help the community of men.*

*12/8/2024 – My threat lead to [AV] who falsely verified my income to no longer be involved and it took this to do it. 100. Mission accomplished. Hi judge! [emoji] I kept asking she be removed and it took this far for that to happen. Fix your stupid ass child support system. Dipshits.*

### **Conclusion**

16. Based on the foregoing, I have probable cause to believe, and I do believe, that **Eduardo SANCHEZ** has made threatening telephone calls, communicating a threat(s) to injure the person of AV, and has thus committed a violation of 18 U.S.C. § 875(c) – Interstate Communications with a Threat to Injure. In consideration of the foregoing, I respectfully request that this Court issue a criminal complaint and arrest warrant for **Eduardo SANCHEZ**.

17. Prior to being submitted to the Court, this complaint and affidavit were reviewed by Assistant United States Attorney Nicole Hermann. AUSA Hermann advised me that in her opinion, the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

### **Request for Sealing**

18. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may endanger the life or physical safety of an individual, cause flight from prosecution, cause intimidation of potential witnesses, or otherwise seriously jeopardize an investigation. Premature

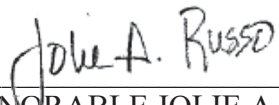


disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

/s/ Jennifer Duke by telephone

Jennifer Duke  
Special Agent  
Federal Bureau of Investigations

Sworn to telephonically pursuant to Fed. R. Crim. P. 4.1 at 2:30 pm ~~am~~ pm on  
December 18 2024.

  
HONORABLE JOLIE A. RUSSO  
United States Magistrate Judge