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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

ANDREW CHRISTOPHER SHANKS

NO.

3-25CR-032 N

INDICTMENT

The Grand Jury charges:

At all times material to this Indictment:

General Allegations

1. Defendant **Andrew Christopher Shanks** utilized a cellular telephone, assigned telephone number XXX-XXX-2746, which used the Wi-Fi and cellular network of an electronic communication service provider and facility of interstate commerce based in New Jersey.
2. Defendant **Andrew Christopher Shanks** utilized an email account with a username dshanks17 of an electronic communications service provider and facility of interstate commerce based in California.
3. Defendant **Andrew Christopher Shanks** utilized Voice Over Internet Protocol (“VOIP”) number XXX-XXX-3075 of the electronic communications service provider and facility of interstate commerce based in California.
4. Public Official 1 was a public official for a county located in the Northern District of Texas.

Count One

Stalking

[Violation of 18 U.S.C. §§ 2261A(2)(A) and (B) and 2261(b)]

5. Paragraphs 1 through 4 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

6. Beginning in or about December 2023, and continuing through on or about January 8, 2025, in the Northern District of Texas and elsewhere, defendant **Andrew Christopher Shanks**, with the intent to kill, injure, harass, and intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, namely Public Official 1, did use an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, including the internet, a cellular network, a computer, a cellular telephone, electronic mail, and VOIP, to engage in a course of conduct that (a) placed Public Official 1 in reasonable fear of death and serious bodily injury, and (b) caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Public Official 1.

In violation of 18 U.S.C. §§ 2261A(2)(A) and (B) and 2261(b).

Counts Two Through Four
 Transmitting a Threatening Communication in Interstate Commerce
 [Violation of 18 U.S.C. § 875(c)]

7. Paragraphs 1 through 4 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

8. On or about the dates identified below, in the Northern District of Texas and elsewhere, defendant **Andrew Christopher Shanks** knowingly transmitted in interstate and foreign commerce the emails and telephone communications identified below containing threats to injure the person of another, for the purpose of issuing threats, with knowledge that the communications would be viewed as threats, and with conscious disregard of a substantial risk that the communications would be viewed as threats, each communication forming a separate count:

| Count | Date | Target of Threat | Threatening Communication |
|--------------|------------------|------------------------------|--|
| Two | October 11, 2024 | Public Official 1 | Email stating, "I wil kill." |
| Three | January 4, 2025 | Public Official 1 | Email stating, "just because you werent brianthmpsoned doesnt mean cant be." |
| Four | January 7, 2025 | Public Official 1 and People | Voicemail threatening to kill people |


All in violation of 18 U.S.C. § 875(c).

A TRUE BILL




FOREPERSON

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ACTING UNITED STATES ATTORNEY



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FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

ANDREW CHRISTOPHER SHANKS

INDICTMENT

18 U.S.C. §§ 2261A(2)(A) and (B) and 2261(b)
Stalking
(Count 1)

18 U.S.C. § 875(c)
Transmitting a Threatening Communication in Interstate Commerce
(Counts 2-4)

4 Counts

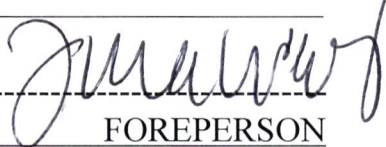
A true bill rendered

DALLAS

Filed in open court this 28 day of January, 2025.

Defendant in Federal Custody since 1/8/2025.


UNITED STATES MAGISTRATE JUDGE
Magistrate Court Number: 3:25-MJ-007-BK


FOREPERSON