

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America
v.
SHAWN ENNIS

Case No. 4:24-mj-182

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 2, 2024 and April 10, 2024 in the county of Walker in the Southern District of Texas, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include Title 18 U.S.C. Section 115 (Threats Against Federal Official), Title 42 U.S.C. Section 1320a-8b (Interfering with the Social Security Administration), and Title 18 U.S.C. Section 875 (Interstate Communications).

This criminal complaint is based on these facts:

On or about April 2, 2024, and April 10, 2024, in the Southern District of Texas, SHAWN ENNIS, ("ENNIS"), the defendant, willfully and knowingly violated Title 18, United States Code, Section 115, Threats Against Federal Official; Title 42, United States Code, Section 1320a-8b, Interfering with the Social Security Administration; and Title 18 U.S.C. Section 875, Interstate Communications.

(Continued on the attached sheet.)

Handwritten signature of Steven Ochocki

Complainant's signature

Special Agent Steven Ochocki, SSA-OIG

Printed name and title

Subscribed and sworn to by Telephone.

Date: April 24, 2024

City and state: Houston, TX

Handwritten signature of Yvonne Y. Ho

Judge's signature

Hon. Yvonne Y. Ho, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Steven Ochocki, being duly sworn deposes and states the following:

1. I am a Special Agent with the Social Security Administration - Office of the Inspector General (SSA-OIG) and I am submitting this affidavit in support of a criminal complaint charging SHAWN ENNIS with violations of 18 U.S.C. § 115 (threats against federal official); 42 U.S.C. § 1320a-8b (interfering with the Social Security Administration); and 18 U.S.C. § 875 (interstate communications).

2. The facts that support a finding of probable cause that SHAWN ENNIS committed the offenses described above are as follows:

3. Affiant is a Special Agent with SSA-OIG and has been a law enforcement officer involved in felony criminal investigations for the past 11 years. Affiant has graduated from four law enforcement academies with a total of over 2,500 hours of academy training. Affiant has participated in hundreds of criminal investigations in the course of Affiant's official duties.

4. The information in the following paragraphs, furnished in support of this affidavit, comes from the personal investigation of Affiant, and from information relayed to Affiant directly by other officials or through Affiant's review of their investigative reports.

5. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant, and it does not set forth all of my knowledge about this matter.

6. On April 2, 2024, at approximately 2:35pm, SHAWN ENNIS called the SSA national 1-800 telephone number from telephone number (346) 606-9506 to obtain assistance with his Social Security Benefits. Victim 1, a Customer Service Representative, employed in the SSA Teleservice Center located in Jamaica, New York answered the call.

7. On April 11, 2024, SSA-OIG Special Agent (SA) Gregory Padilla reviewed the recorded phone call SHAWN ENNIS placed to the SSA national 1-800 telephone number on April 2, 2024. The call lasted approximately 28 minutes and 3 seconds. SHAWN ENNIS identified himself to Victim 1 by providing his full name, date of birth, where he was born, and his mother's maiden name.

8. During the call SHAWN ENNIS became increasingly irate and continued to yell obscenities at Victim 1. At approximately 18 minutes and 3 seconds SHAWN ENNIS yelled the following to Victim 1:

- a. "I'm going to tell you what I'm gunna do. I'm gunna tell you what I'm gunna do. I'm psycho. I'm psycho all the way out. I'm gunna go to the Social Security place in Conroe (Texas). I'm gunna walk up in

there and get everybody attention. I'm gunna get everybody attention then I'm gunna shoot myself in the head and kill myself right there."

9. At approximately 25 minutes and 42 seconds into the call SHAWN ENNIS yelled the following to Victim 1:

- a. "This system is so crooked and I'm telling ya man. My name is Shann Ennis, date of birth 9/14/70. I give you everything. I'm going down there and blow that mother fucker up, when I am down \$400. When I am tired of being homeless."
- b. Victim 1 replied with, "Those are very strong threats sir."
- c. SHAWN ENNIS replied by yelling, "They sure ain't. I don't care what happens man. I said that and I'll do that. So what now, you gunna call the police? Huh?"

10. On April 11, 2024, SA Padilla interviewed Victim 1, who is a disabled veteran. Victim 1 told law enforcement that SHAWN ENNIS said he was going to blow up the Conroe, TX SSA office and also go into the office and shoot himself. Victim 1 also said that this situation was making him feel very distraught and he told SA Padilla that he needed to take the rest of the day off after the interview because he was very distraught.

11. On April 10, 2024, SHAWN ENNIS called the Conroe (Texas) SSA office from the telephone number (346) 606-9506. Victim 2, a Claims Specialist, employed by the Conroe SSA Field Office, answered the call.

12. On April 11, 2024, SA Padilla interviewed Victim 2. Victim 2 stated that SHAWN ENNIS called the Conroe SSA Field Office between approximately 10:00am and 10:30am. Victim 2 stated that SHAWN ENNIS immediately became irate and began yelling and cursing at her. Victim 2 said that during the call SHAWN ENNIS told her “not to worry, because I have been back and forth of being in and out of prison and that I will do anything I need to do in order to get my benefits and if that means I need to rob, jack, or kill I will do what I have to do.”

13. Victim 2 then said SHAWN ENNIS yelled, “I am going to ride my bike up there and kill myself and kill anybody else who gets in the way of me getting my check.” Victim 2 also said that SHAWN ENNIS explicitly told her that he meant every word that he said and that he has already committed four murders.

14. Victim 2 told SA Padilla that she felt threatened, and that SHAWN ENNIS was scaring her during the call. Victim 2 said she felt stressed and panicked during the call with SHAWN ENNIS, and she struggled to keep ENNIS calm while simultaneously notifying her supervisors of his threat.

15. Victim 2 stated that SHAWN ENNIS apologized for offending her but made it very clear that he meant every word he said. Victim 2 is still fearful of ENNIS, due to his threat.

16. On April 10 and April 11, 2024, SA Padilla spoke with the Assistant District Manager (ADM) for the Conroe, TX SSA Field Office. The ADM told Affiant that her staff was very scared by the threats SHAWN ENNIS made and that many of them requested that the Social Security office be closed to ensure employee safety. The ADM also informed Affiant that telephone number (346) 606-9506 belonged to SHAWN ENNIS' mother and that SHAWN ENNIS lives with his mother at 90 Louis Davis Dr, Huntsville, TX.

17. On April 11, 2024, Affiant reviewed SHAWN ENNIS' criminal record. Since 1987, SHAWN ENNIS has been arrested approximately 35 times. Of these 35 separate arrests, many of them are violent in nature including, Resisting an Officer, Escape, Assault, Assault that Causes Bodily Injury, Assault that Causes Bodily Injury to a Family Member, Assault of Family Member by Impeding Breath or Circulation, Prohibited Weapons, and Theft of a Firearm. In many of these offenses SHAWN ENNIS is a repeat offender.

18. On April 17, 2024, SA Padilla and Affiant interviewed ENNIS' mother Mary O'Bryant and his sister Anee Ennis. Mary O'Bryant and Anee Ennis were played a partial recording of the call SHAWN ENNIS made to SSA on April

2, 2024. Both Mary O'Bryant and Anee Ennis recognized the voice of the caller as SHAWN ENNIS.

19. Mary O'Bryant also told SA Padilla and Affiant that ENNIS uses her cellphone to call SSA, because he does not have a phone of his own. She told us that her phone number is 346-606-9506. This is the same number that ENNIS used to threaten SSA employees on April 2 and April 10.

20. Mary O'Bryant's phone allowed SA Padilla to review the call history on her phone. SA Padilla located the call placed by ENNIS to the SSA National Number of 1-800-772-1213 on April 2, 2024, at 12:38 PM Central Standard Time. SA Padilla also located the call placed by ENNIS to the SSA Conroe Field Office Phone Number 1-866-614-0032 at 9:29 AM Central Standard Time. SA Padilla photographed the call logs from O'Bryant's cellphone using the Axon Capture Application. The photos have been uploaded to Evidence.com.

21. On April 17, 2024, SA Padilla and Affiant interviewed ENNIS at his home residence located at 1024 Elm Avenue, Apt. 7, Huntsville, TX 77302. ENNIS confirmed that he made the threatening call to SSA. ENNIS told us that SSA didn't care about his situation and that he should just get a gun and shoot himself.

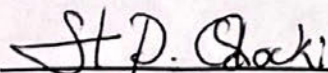
22. On April 17, 2024, ENNIS called SA Padilla seeking help with his SSA needs. Affiant was with SA Padilla and SA Padilla place the phone call on

speaker. SA Padilla told ENNIS that ENNIS needed to call him back in a day or two when he was at his work computer. ENNIS stated "I knew you white boys didn't want to help. Next time you hear from me, I will be dead."

23. On April 18, 2024, ENNIS again called SA Padilla and asked for help with his head and help finding a place to stay. SA Padilla asked ENNIS if ENNIS wanted to go to a hospital to get some help and if he wanted to hurt himself. ENNIS stated "yes." SA Padilla told ENNIS that he was in Houston and ENNIS was in Huntsville, so the best way to get help is to call for an ambulance or the police. ENNIS became angry, yelled at SA Padilla regarding SA Padilla's race, and stated that he was going to kill himself before hanging up. SA Padilla called Walker County Dispatch and officers were dispatched to ENNIS' residence for a welfare check.

24. On April 22, 2024, Affiant reviewed ENNIS' SSA record and learned that ENNIS is now receiving \$956.00 a month in Disability Benefits. His qualifying medical conditions are listed as "Fractures of Lower Limb" and "Fractures of Upper Limb."

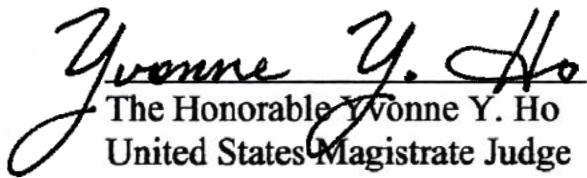
I, Steven Ochocki, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



Steven Ochocki

Special Agent
Social Security Administration
Office of Inspector General

Subscribed and sworn to me by telephone on April 24, 2024, and I find
probable cause.


The Honorable Yvonne Y. Ho
United States Magistrate Judge