



**COUNT TWO**  
(Cyberstalking)

2. From at least in or about the mid-2018, up to and including in or about June 2019, in the Southern District of New York and elsewhere, WILLIE DENNIS, the defendant, with the intent to injure, harass, and intimidate another person, used the mail, interactive computer services and electronic communication services and electronic communication systems of interstate commerce, and other facilities of interstate and foreign commerce, including electronic mail, phone calls, text messages, and faxes, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, to wit, DENNIS in an unrelenting campaign of harassment, intimidation, and threats against an individual ("Victim-2") in New York, New York [CONFIRM], including by sending harassing, threatening, and intimidating text messages to Victim-2.

Commented [KS(2)]: Eric Cottle  
Kushner, Sarah (USANYS)  
2020-10-14 10:22:00

**COUNT THREE**  
(Cyberstalking)

3. From at least in or about [date], up to and including at least in or about September 2020, in the Southern District of New York and elsewhere, WILLIE DENNIS, the defendant, with the intent to injure, harass, and intimidate another person, used the mail, interactive computer services and electronic communication services and electronic communication systems of interstate commerce, and other facilities of interstate and foreign commerce, including electronic mail, phone calls, text messages, and faxes, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, to wit, DENNIS has engaged in a campaign of harassment, intimidation, and threats directed at an individual ("Victim-3") in New York, New York [CONFIRM], including by sending harassing, threatening, and intimidating text messages to Victim-3.

Commented [KS(3)]: Rob Matlin  
Kushner, Sarah (USANYS)  
2020-10-14 10:22:00

**COUNT FOUR**  
(Cyberstalking)

4. From at least in or about March 2019, up to and including the present, in the Southern District of New York and elsewhere, WILLIE DENNIS, the defendant, with the intent to injure, harass, and intimidate another person, used the mail, interactive computer services and electronic communication services and electronic communication systems of interstate

commerce, and other facilities of interstate and foreign commerce, including electronic mail, phone calls, text messages, and faxes, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, to wit, DENNIS has engaged in an unrelenting campaign of harassment, intimidation, and threats directed at an individual ("Victim-4") in New York, New York [CONFIRM], including by sending harassing, threatening, and intimidating text messages to Victim-4.

The bases for my knowledge and for the foregoing charge are, in part, as follows:

#### Overview

5. As set forth in greater detail below, WILLIE DENNIS, the defendant, has engaged in a long-term and pervasive campaign of harassment, intimidation, and threats directed at former colleagues (the "Victims") at his former law firm (the "Law Firm"). Specifically, since in or about 2018, and up to and including the present, DENNIS has sent more than one thousand emails, text messages, and fax communications to the Victims.<sup>1</sup> DENNIS has sent threatening messages to the Victims at all hours of the day and night, often in rapid succession. Through these communications, as well as phone calls and voicemails to Victims, DENNIS has threatened and sought to intimidate and stoke fear in the Victims and their families.

6. In these communications, WILLIE DENNIS, the defendant, has made false accusations against the Victims and the Law Firm, portrayed the Law Firm and its senior members as having discriminated against him based on his race, and complained about his termination from the Law Firm. DENNIS has also threatened physical harm to certain Victims and threatened to visit Victims and their families at their homes. On or about October 9, 2020, for example, DENNIS called a senior member of the Law Firm and stated, in substance and in part: "someone is going to get physically hurt and it is not someone who deserves to be hurt."

7. The unrelenting harassment campaign and cyberstalking by WILLIE DENNIS, the defendant, against the Victims has caused or would be reasonably expected to cause the

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<sup>1</sup> For example, between on or about May 13, 2019, and on or about September 20, 2019, WILLIE DENNIS, the defendant, sent at least hundreds of written communications to Victims. Between on or about September 4, 2019, and on or about September 20, 2019, alone, DENNIS sent at least approximately 200 hundred written communications to Victims and other members of the Law Firm.

Victims substantial emotional distress and fear for their physical safety. At least one Victim has been forced to leave New York and relocate to another state as a result of DENNIS's ongoing threats and efforts to harass and intimidate his former colleagues. Another Victim has had to change the location of his/her parking garage and upgrade his/her home security system.

#### **The Defendant**

8. Based on my conversations with senior members of the Law Firm, I have learned, among other things, that for fourteen years, WILLIE DENNIS, the defendant, was an attorney at the Law Firm, based in New York City. DENNIS joined the Law Firm in or about 2005, and became a partner. DENNIS worked at the Law Firm's New York office, located in the Southern District of New York, until he was terminated on or about May 13, 2019. DENNIS was terminated from the Law Firm for erratic and threatening behavior, as well as his years-long poor performance as a partner.

9. Based on my conversations with senior members of the Law Firm, I have learned, among other things, that WILLIE DENNIS, the defendant, resides in New York, New York.

10. Based on my conversations with senior members of the Law Firm, I know that WILLIE DENNIS, the defendant, is Black, as are certain of his Victims.

#### **The Victims**

11. Based on my conversations with senior members of the Law Firm and Victims, I have learned, among other things, that the Victims are prominent attorneys at the Law Firm and/or members of the Law Firm's management committee. The Victims knew WILLIE DENNIS, the defendant, in a professional capacity. Certain Victims worked closely with DENNIS on matters at the Law Firm.

12. Based on my conversations with senior members of the Law Firm and Victims, I have learned that the Victims work in the Law Firm's New York office and/or live in New York, New York.

#### **Victim-1**

13. Based on my interview with a senior member of the Law Firm ("Victim-1") [John Bicks], and my review of electronic communications, including emails and text messages that Victim-1

received from WILLIE DENNIS, the defendant, I have learned that DENNIS engaged in a pattern of harassment, intimidation, and threats directed at Victim-1. Victim-1 works in the Law Firm's New York office.

14. Based on my review of communications sent by WILLIE DENNIS, the defendant, to Victim-1 and other employees at the Law Firm, I believe that DENNIS's messages are intended to intimidate and stoke fear in the recipients, including Victim-1. For example, in some messages, DENNIS refers to recent mass shootings and other violence reported in the news; in others, DENNIS quotes violent scripture passages and claims to be acting at the direction of God. For example:

a. On or about July 14, 2019, DENNIS, using one of his Gmail accounts ("Email Account-1") [bllj4848@gmail.com], sent the following biblical passage to Victim-1 and another Law Firm employee: "The Lord preserves all that love Him, but the wicked He will destroy," to which DENNIS then stated "Amen."

b. On or about August 4, 2019, DENNIS, using one of his Gmail accounts ("Email Account-2") [woc2020@gmail.com], sent Victim-1 and another Law Firm employee a link to an article about a "mass shooting in downtown Dayton" that left 9 dead and 16 injured. Shortly thereafter, DENNIS sent a follow-up email, in which he stated: "[h]eading to service now and will pray on this as well as our issues." On or about August 7, 2019, DENNIS, from a different Gmail account ("Email Account-3") [pmglm71947@gmail.com], sent Victim-1 and two other Law Firm employees a copy of the front page of a newspaper picturing the "Dayton terrorist."

c. On or about August 8, 2019, DENNIS, using DENNIS Email Account-2 [woc2020@gmail.com], sent Victim-1 and another Law Firm employee a link to an article about a mass stabbing in California in which 4 people were killed and 2 were injured. In the email, DENNIS included the following quote from the article, specifically emphasizing that the suspect's motive was "anger and hate" by underlining those two words in the email: "The suspect's motive appears to be robbery, anger and hate."

d. On or about August 9, 2019, DENNIS, using Email Account-2 [woc2020@gmail.com], sent a message to Victim-1 and another Law Firm employee in which DENNIS quoted another biblical passage: "evildoers . . . shall soon be cut down like green herb." That email also contained a link to an article about Jeffrey Epstein's suicide.

e. On or about August 31, 2019, DENNIS, using Email Account-2 [woc2020@gmail.com], sent Victim-1 and another Law Firm employee a link to an article about a mass shooting in Texas, in which 5 people were killed, and 21 injured.

15. Based on my review of communications received by Victim-1, I have learned that WILLIE DENNIS, the defendant, has also threatened Victim-1 and Victim-1's family. For example, DENNIS sent the following messages to Victim-1:

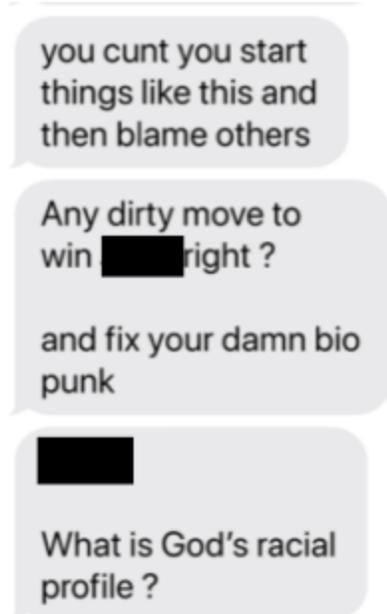
a. In or about May 2020, DENNIS, using a phone number subscribed to in his name ("Phone Number-1") [646-418-3329] [CONFIRM that Dennis is the subscriber], sent back-to-back text messages to Victim-1 and another member(s) of the Law Firm, accusing Victim-1, among other things, of being a racist. For example:

I am sure [REDACTED] was a  
dirty prosecutor  
...just have to find the  
case and put your  
punk ass in jail

4 officers commit  
murder but in [REDACTED]  
racist  
mind, the three that  
were watching were  
innocent

Right racist ?

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b. On or about August 26, 2020, WILLIE DENNIS, the defendant, sent several members of the Law Firm, including Victim-1, approximately 75 back-to-back menacing text messages using [WHICH NUMBER/EMAIL?]

c. On or about August 28, 2020, WILLIE DENNIS, the defendant, sent several members of the Law Firm, including Victim-1, approximately 40 back-to-back text messages, using Phone Number-1.

d. Between on or about August 29, 2020, and on or about August 30, 2020, WILLIE DENNIS, the defendant, sent several members of the Law Firm, including Victim-1, approximately 95 text messages, using Phone Number-1.

e. In or about early September 2020 [CONFIRM], DENNIS, using [WHICH NUMBER/EMAIL?], sent back-to-back menacing text messages to Victim-1 and another member of the Law Firm. The text messages, which were increasingly belligerent and threatening, accuse Victim-1 of ignoring "the plight of the black community." In one text message in the chain, DENNIS states, "I am a witness to you killing God's children. Do u expect me to do nothing ?" In the same chain, DENNIS states:

"Killing children  
Who is insane?  
Who is offensive in the eyes of the Lord!  
and all u say in unison  
'Willie Dennis'"

In yet another text message in the chain, referring to a complaint that the Law Firm allegedly made to the New York City Police Department (the "NYPD") about DENNIS's conduct, DENNIS stated:

"1 That by going to my wife with information  
about me which you will not share and  
2 sending police [] to my family home . . .  
U introduced children and family into this mix."

f. On or about October 8, 2020 [confirm], Victim-1 received approximately 80 text messages from DENNIS that were directed both at Victim-1 and Victim-1's children. One such message stated, in part, "Look forward to many evening chatting[. . . .] Anything I do will never repay you for all what you have done to me and my family . . . but I am going to try. I am going to research your family as you did mine." In another message, DENNIS asked how things were going at Victim-1's children's school, and then stated: "Still less than putting your sons' lives in jeopardy ...right." That message was followed by an image of a black male, with the heading "Why am I dead?" In two other messages, DENNIS called Victim-1 a "[b]igot." In yet another message in the same text chain, DENNIS stated: "u r a bad person that deserves to be severely punished (figuratively we both know what a liar u r)." DENNIS sent these messages using [WHICH PHONE NUMBER/EMAIL?].

16. Based on my review of documents, I know that the messages discussed above are just a small sample of the threatening communications that WILLIE DENNIS, the defendant, has sent as part of his cyberstalking of, and efforts to harass and intimidate, Victim-1.

17. Based on my conversations with Victim-1, I have learned, among other things, that Victim-1 and Victim-1's spouse and children have experienced, and are continuing to experience, great distress as a result of the unrelenting barrage of messages that WILLIE DENNIS, the defendant, has sent to Victim-1.

#### Victim-2

18. Based on my conversations with another senior member of the Law Firm ("Victim-2") [Eric Cottle], who is Black, I have learned, among other things, that beginning in or about the fall of 2018 [confirm] through at least in or about June 2019 [confirm], DENNIS sent Victim-2 thousands [confirm] of harassing and threatening text messages, causing Victim-2 to "block" communications from WILLIE DENNIS's, the defendant's, phone.

19. Based on my conversations with Victim-2, I have learned about specific instances of harassing conduct by WILLIE DENNIS, the defendant, against Victim-2, including as follows:

a. In or about June 2019, before Victim-2 blocked DENNIS, Victim-2 woke up to approximately hundreds [confirm] of text messages from DENNIS in which DENNIS accused Victim-2, in sum and substance, of "stealing" money from DENNIS and his children. DENNIS sent these messages using [WHICH PHONE NUMBER/EMAIL?].

b. In or about June 2019, after DENNIS had been terminated from the Law Firm, Victim-2 traveled to a professional conference outside of New York. At the conference, Victim-2 was surprised to see DENNIS there. While Victim-2 was speaking to other conference attendees at a networking reception, DENNIS approached Victim-2 and spoke to Victim-2 in a loud and angry manner. DENNIS insisted on talking about the Law Firm. Victim-2 told DENNIS that Victim-2 was there to enjoy the conference and did not wish to discuss the firm; Victim-2 then excused himself. Between that evening and the next morning, DENNIS, using [WHICH PHONE NUMBER/EMAIL?] sent Victim-2 approximately 20 text messages. At a breakfast the next morning, DENNIS found Victim-2 and began complaining very loudly about the Law Firm and Victim-2's alleged disinterest in diversity. Victim-2 left the room. DENNIS followed Victim-2 and took photos of Victim-2. Finally, because DENNIS would not stop following Victim-2, Victim-2 had to leave the conference.

20. Based on my conversations with Victim-2, I have learned, among other things, that Victim-2 stopped going to conferences and other industry meetings because Victim-2 feared that WILLIE DENNIS, the defendant, would be present and might threaten Victim-2.

**Victim-3**

21. Based on my conversations with another senior member of the Law Firm ("Victim-3") [Rob Matlin] I have learned, among other things, that:

a. Victim-3 has known WILLIE DENNIS, the defendant, for many years.

b. Victim-3 and DENNIS used to socialize together and spend time with each other's families. DENNIS has been to events at Victim-3's home and knows Victim-3's children.

22. Based on my conversations with Victim-3 and my review of written communications sent by WILLIE DENNIS, the defendant, I have learned, among other things, that from in or about [date] to in or about [date], DENNIS sent Victim-3 at least hundreds [confirm] of text messages containing harassing and intimidating statements, including threats directed at Victim-3 and Victim-3's family. For example:

a. On or about September 1, 2020, DENNIS sent back-to-back text messages to Victim-3 and two other recipients, including text messages in which DENNIS threatened to "kill" Victim-3 and Victim-3's "kids."

b. Among the texts that DENNIS sent Victim-3 on or about September 1, 2020, was a text that stated: "you r willing to assist in breaking 'one' of God's Ten Commandments[:] 'Thou shall not kill.'"

**Victim-4**

23. Based on my conversations with a partner at the Law Firm ("Victim-4") [Calvina Bostick], who is Black, and my review of messages Victim-4 received from WILLIE DENNIS, the defendant, I have learned, among other things, that DENNIS has also cyberstalked Victim-4.

24. Based on my review of messages Victim-4 received from WILLIE DENNIS, the defendant, I have learned, among other things, that since at least in or about March 2019, DENNIS has sent a barrage of back-to-back text messages to Victim-4, including, for example, the following text messages:

a. On or about September 2, 2019, DENNIS sent back-to-back text messages to Victim-4, including the following message:

"Finally i urge you not to share my texts with them [i.e., other members of the Law Firm]... but you did.

In the Firms criminal complaint against me some of the texts you passed along are included.

Also our accidental meeting in the restaurant is noted as a 'threatening encounter.'"

25. Based on my review of threatening communications Victim-4 received from WILLIE DENNIS, the defendant, I have also learned that DENNIS attacked Victim-4 for allegedly "hav[ing] undercover Chicago police officers . . . attend" a Corporate Counsel Women of Color conference. For example, in or about 2019, DENNIS sent Victim-4 the following text messages, among many others:

a. "[A] major supporter of [the conference] of course is aware of the gunmen you and the other partners sent to the 'women's conference . . . i would be prepared if it should ever arise to explain why you[] thought it was necessary or how you tried to prevent it. Anything less will raise eyebrows."

b. "More thoughts . . . and I am protecting your reputation so i hope you do not give them anything else[.] Do you think they could send armed men into a diverse women's conference with out good reason and get away with it[.] As i told [other members of the Law Firm] at the time if i had sent armed undercover investigators in to a conference where . . . there [were] women and children[,] they would have[,] and rightly so, put me in lockdown ...forever[.] I am looking for equality and intend to do the same to them."

c. "If someone had been injured at the Conference by the Chicago police officers in the room, what would you have stated in the police report as to the reason for the officers being there ? . . . Were you[r] actions 'reasonable' biscuit head or purely self interested ?"

d. "Your failure to adequately protect other women of color is reprehensible[.] . . . Your 'intentional' actions which endangered women of color at the . . . conference ( engaging Chicago police officers to walk undisclosed among the women attendees) are reprehensible."

26. Based on my review of text messages WILLIE DENNIS, the defendant, sent to Victim-4, I have also learned that DENNIS falsely accused Victim-4 of having an extramarital affair with another member of the Law Firm and sent Victim-4 other inappropriate text messages with false claims about Victim-4's dating and sex life. For example:

Your quick rise to influence in the New York office is clearly related to how close you are with [REDACTED] 🍷🍷

You and [REDACTED] always spend a lot of time together working on projects, I assumed that is how the two of you became so close 🍷🍷

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and you learned all thru [REDACTED] whispering " sweet nothings " in your ears 🍷  
Are u with him tonight 🍷🍷

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i know u like married men ..but  
in the office ?

Is your " Tinder " account still  
active ?

How man " hook ups " did you  
get on Tinder ?

Does [REDACTED] know about your  
Tinder account ?

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Does your mother know about  
your relationship with [REDACTED] ?

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And no Tinder booty calls for  
you this week

u are on ....lockdown 🤔

u know me now clown 🤡

How many dudes did you find  
on Tinder ?

What was the quality of the d...😂

i always knew this was more your type of conversation

Always the quiet ones 😂

27. In falsely accusing Victim-4 of having an extramarital affair, WILLIE DENNIS, the defendant, warned Victim-4 not to lie about it: "don't perjure yourself because I will push for prison time for you."

28. Based on my review of documents, I have learned that there are many other text messages that WILLIE DENNIS, the defendant, sent to Victim-4 as part of DENNIS's campaign of harassment and cyberstalking. Here are just a few more examples:

a. "Let's fill up your 'evil' files[.] Do not fool me. Was hoping you would change but ...gutter to the end"— "[s]o let's send you back there."

b. "U wished the police [ ] had killed me[.] No need to answer[.] God just read your mind. I have to go talk to a few other 'unholies' but will come back to you later."

c. "In fact until now and only since God has commanded me to act against your falsehoods."

d. "U know u deserve whatever comes your way during this 'biblical moment.'"

e. "God has now commanded me to call out you[r] actions which are so offensive in his eyes."

f. "You need to practice outside of New York. Because if you stay in New York i am going to follow u till u answer my questions cotton head."

g. "They like to make examples. I am going to make one of u u u u."

h. "U really need to leave the New York office soon ..like in a week or so you will become part of the public conversation."

i. "You are going to be a 'biblical symbol' during this time of injustice and hatred of what happens when you are offensive in the eyes of the Lord."

29. Between approximately 1:00 a.m. or about October 8, 2020, and 6:00 a.m. on or about October 9, 2020, WILLIE DENNIS, using Email Account-3 [pmglm71947@gmail.com] sent Victim-4 approximately 110 back-to-back messages, including as follows:

If you escape jail  
for all this stuff i will be  
surprised because i am going  
to do my darndest

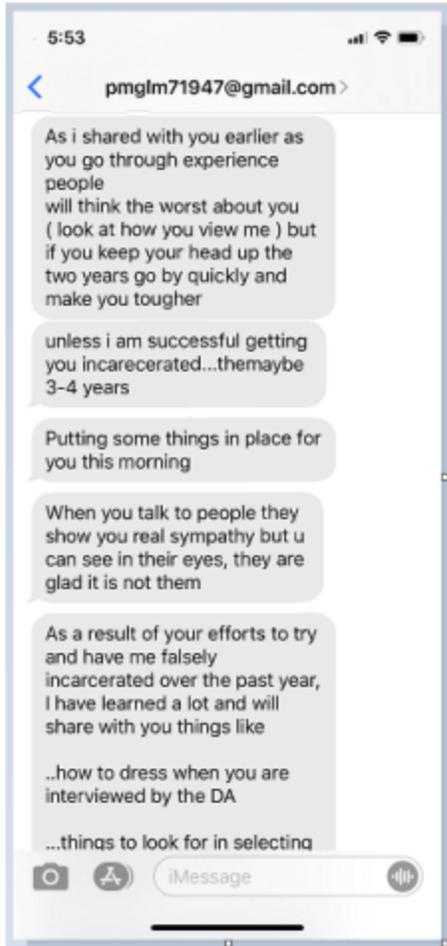
Somebody has to get stuck  
and you have the statements in  
the public records and the  
public statements so

...looks like you...

Think you can avoid

1 Perjuy criminal  
court  
2 Defamation /slander /civil  
court  
more to follow

Can you win them  
all ..one loss and ....





30. On or about October 5, 2020, Victim-4 received more than approximately 100 text messages from WILLIE DENNIS, the defendant, who sent those messages using Email Account-3. [CONFIRM]

31. On or about October 6, 2020, Victim-4 received approximately 37 text messages from WILLIE DENNIS, the defendant, who sent those messages using Email Account-3.

32. On or about October 8, 2020, Victim-4 received approximately 48 text messages from WILLIE DENNIS, the defendant, who sent those messages using Email Account-3.

33. On or about October 10, 2020, Victim-4 received approximately 32 text messages from WILLIE DENNIS, the defendant, who sent those text messages using Email Account-3.

34. Based on my conversations with Victim-4 and senior members of the Law Firm, I have learned that Victim-4 has had to leave New York and relocate to another state as a result of WILLIE DENNIS's, the defendant's, conduct.

**DENNIS Controlled The Email Accounts And Phone Number(s)**

35. Email Account-1 [b1lj4848@gmail.com]: As set forth above, see ¶¶ [XX], WILLIE DENNIS, the defendant, used Email Account-1 to send harassing and threatening communications to Victim-1. Based on records obtained from Google pursuant to a subpoena, I have learned that the subscriber of Email Account-1 is "Willie Dennis." Moreover, the recovery email for Email Account-1 is Email Account-3, another one of DENNIS's accounts, and the phone number listed for Email Account-1 is Phone Number-1.

36. Email Account-2 [woc2020@gmail.com]: As set forth above, see ¶¶ [XX], WILLIE DENNIS, the defendant, used Email Account-2 to send harassing and threatening communications to Victim-1. Based on records obtained from Google pursuant to a subpoena, I have learned that the subscriber of Email Account-2 is "Willie Dennis." Moreover, the phone number listed for the account is Phone Number-1.

37. Email Account-3 [pmglm71947@gmail.com]: As set forth above, see ¶¶ [XX], WILLIE DENNIS, the defendant, used Email Account-3 to send harassing and threatening communications to Victim-1 and Victim-4. Based on records obtained from Google pursuant to a subpoena, I have learned that the subscriber of Email Account-3 is "Willie Dennis." Moreover, the phone number listed for the account is Phone Number-1.

38. Phone Number-1: As set forth above, see ¶¶ [XX], WILLIE DENNIS, the defendant, used Phone Number-1 to send harassing and threatening communications to Victim-1 and Victim-4, among others. Phone Number-1 is the phone number that the Law Firm had on file for DENNIS and is also the phone number that the Victims had in their phones for DENNIS. [DO SUBPOENA RETURNS SHOW THAT DENNIS IS SUBSCRIBER OF THIS NUMBER?]

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of WILLIE DENNIS, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

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Special Agent Elisabeth Wheeler  
Federal Bureau of Investigation

Sworn to me through the transmission of this Affidavit by reliable electronic means, pursuant to Federal Rules of Criminal Procedure 41(d)(3) and 4.1 this, \_\_\_ day of October, 2020

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THE HONORABLE JAMES L. COTT  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK