

The People v. Shannon O'Connor
District Attorney BOI #2107-01942

District Attorney Investigator Christina Hanks #96

STATEMENT OF FACTS

I, Investigator Christina Hanks #96, offer the following declaration as a synopsis of the official reports, documents, and continuing investigation of District Attorney's Office case number 2107-01942. I am currently investigating child abuse and sexual assault charges involving Shannon O'Connor (DOB: 4/23/1974). From being one of the lead investigators in the case, I believe the following to be true as part of District Attorney's Office case #2107-01942.

I am currently employed as a Criminal Investigator with the Santa Clara County District Attorney's Office, assigned as an Investigator for the Sexual Assault Unit.

Defendant is the parent of minor son, John Doe 3. John Doe 3 turned 15 in October 2020. During an 8-month period starting the Summer before John Doe 3's fifteenth birthday, Defendant supplied excessive amounts of alcohol to her son and his minor friends to the point where minors would vomit, be unable to stand, and fall unconscious. When these minors were extremely intoxicated from the alcohol, she encouraged them to engage in sexual activity with each other, facilitated sexual encounters, and watched some of these sexual encounters. The charges listed in the complaint are based on the specific facts described below.

I. June - August 2020

- A.** During a summer party hangout at Defendant's residence, Defendant provided copious amounts of alcohol to minors. Jane Doe 10 (age 13-14), one of the only sober minors, was asked by Defendant to watch an extremely intoxicated minor boy, John Doe 6 (age 14). Defendant told Jane Doe 10, she was on "[John Doe 6] duty" and left Jane Doe 10 in the bathroom where John Doe 6 was passed out, covered in his own vomit, and only waking up to continue to vomit.
- B.** Defendant informed the sober minor that a few months ago she thought she was going to have to call an ambulance because a minor was too intoxicated. Jane Doe 10 asked if they should call 911 now and Defendant said no. Instead of calling for assistance on a severely ill minor, Defendant tasked a minor girl with his care.
- C.** Defendant and the minor girl attempted to clean up the intoxicated minor under the shower. When Defendant realized her husband was almost home, she rushed the minors to leave to avoid her husband finding out.

II. August 2020

- A.** Defendant told all minors who attended parties at her residence or were given alcohol not to tell anyone about the parties. She stated if anyone was told she could go to jail. Defendant believed Jane Doe 5 (age 14) was breaking this

rule she imposed and telling people about the parties. As a result, Defendant threatened to spread rumors about Jane Doe 5.

- B. Defendant repeatedly contacted Jane Doe 5 over the course of several weeks demanding she confess to telling people about the parties. When Defendant was ignored, Defendant had other minors contact Jane Doe 5 on her behalf with the same demand. If Jane Doe 5 did not confess, Defendant threatened to spread rumors about her. Defendant also threatened to tell the other minors that Jane Doe 5 made mean comments about John Doe 5, who was a good friend of hers.
- C. Jane Doe 5 feared Defendant would follow through on this threat as Defendant had spread rumors about other minors in the past, and she did not want to lose her friends. During this time, she took extreme steps to plan how to communicate with Defendant that she was not the person who told about the parties.
- D. As a result of Defendant's threats, Jane Doe 5 suffered mental and emotional turmoil. She had panic attacks, and had to sleep in her parents' room

III. September 18, 2020

- A. Multiple minor boys were provided alcohol by Defendant and were drinking at the Defendant's home. Video was obtained showing multiple minors riding in the backseat of Defendant's vehicle, not properly restrained, while the Defendant was driving. These minors are displaying various levels of intoxication. One minor, John Doe 2 (age 14), is on video passing out due to alcohol intoxication. At times, John Doe 2 wakes up, mutters incoherent words, and then passes out again. Defendant can be heard on the video telling the minors to stop recording.

IV. October 2 – October 5, 2020

- A. Defendant rented a cottage, located at or around 116 20th Avenue, Santa Cruz, California, for the weekend of October 2-5, 2020, to celebrate her son, John Doe 3's, birthday. Prior to the trip, Defendant organized a group Snapchat titled "[John Doe 3's] B-day Bash" where she asked the minors what kind of alcohol they wanted provided to them at the party. In the same Snapchat group, Defendant reminded them to keep this event a secret, not tell any other friends, and that Defendant would have to vet any invited girls.
- B. One of the minors present stated the weekend rules, given by Defendant, included to drink inside the house and to not have their phones.
- C. From the homeowner's external video cameras, there was an estimation of 12 minor boys and girls at the home, with the Defendant being the only adult present. Defendant ordered two large deliveries of alcohol to the home. The external video cameras recorded several minor boys urinating on the property, stumbling and falling over on the back patio, and throwing up in the backyard. The homeowner found extensive damage caused to the inside of the house, totaling in \$9,000 worth of expenses.
- D. Minors present at the party report multiple minors passing out and vomiting from alcohol intoxication. Videos obtained by law enforcement show Defendant

interacting with the minors while they are consuming alcohol. A photo shows Defendant standing over a minor female as she is chugging a bottle of alcohol. A video obtained shows Defendant sitting with the minors while they are extremely intoxicated and she looks at one minor and says, “you are not okay either.”

- E. Many minors present at the party were sending videos via snapchat. These videos show one minor, John Doe 4 (age 14), intoxicated to the point where he is slurring his words and cannot be understood, he is unable to stand, and is repeatedly falling over.

V. October 30, 2020

- A. Defendant organized a Halloween party on October 30, 2020.
- B. On October 28, 2020, Defendant called Los Gatos Police Department to advise there was going to be a Halloween gathering at her home on 10/30/2020, between 6PM and 10PM (incident #2010280053). She explained that her neighbors frequently called the police department on her and she requested that if there were any issues for the police to call her first before responding out. She stated she would tell those at the home not to answer the door unless she was called prior to police arrival. No prior calls for services regarding neighbors calling on Defendant could be substantiated.
- C. A few days before Halloween, Defendant had multiple cases of beer and bottles of liquor in the back of her car. She told multiple minors to move the alcohol so it was hidden in the bushes of her backyard, near the playground covered by blankets. There is an estimation of eight cases of beer and two bottles of hard alcohol (Vodka and Fireball).
- D. Defendant messaged many kids regarding the Halloween party prior to it occurring. She told the boys, in the Snapchat conversation, she would tell the parents it was a basketball and ping pong party. She informed them that she and her husband would be gone during a specific time and their return time.
- E. Defendant schemed to take her husband, Robert Amaral, out of the house around 7:30 PM for a few hours. The minors knew they had to wait for him to leave before they could begin drinking. In total, approximately 20 minors attended the party.
- F. Many drank heavily that night, to the point of vomiting multiple times. Three or four of the minor girls passed out due to the high level of alcohol intake. Jane Doe 1 (age 14) broke her right pinkie finger, requiring surgery to correct the injury.
- G. John Doe 5 (age 14) was picked up from the party by his father. He was extremely intoxicated and vomited multiple times at home as a result. His father then checked John Doe 5’s phone and found snapchat conversations with Defendant.
- H. Defendant created a Snapchat group with the boys in attendance and openly discussed the fact that kids were drinking and getting sick. Her only concern was kids being caught by their parents. She also informed the minor boys to clean up the house before she and her husband returned.

VI. December 2020- Jane Doe 4 (age 14)

- A. Jane Doe 4 spent a significant amount of time at Defendant's home between December 1, 2020 to February 14, 2021. During this time, she drank copious amount of alcohol provided by Defendant and was observed by many witnesses in a state of extreme intoxication.
- B. On or around December 2020, Jane Doe 4 was present and intoxicated at Defendant's residence. Jane Doe 4 was laying on a bed in the residence due to her level of intoxication. Defendant handed a condom to an intoxicated minor boy and pushed him into the bedroom with Jane Doe 4. Jane Doe 4 was afraid, ran, and locked herself in the bathroom.
- C. On or around December 2020, Defendant called Jane Doe 4. It was known Jane Doe 4 and John Doe 3 (age 15) (Defendant's son) were intermittently in a relationship. Defendant found out Jane Doe 4 kissed another boy. Defendant informed Jane Doe 4 at the beginning of the conversation that she was in a room with John Doe 1 (age 14) and John Doe 3. Defendant told Jane Doe 4 to give John Doe 1 a "blowjob." In return, John Doe 1 would speak to John Doe 3 so John Doe 3 would not be upset with her. Jane Doe 4 was extremely uncomformable with this proposition and did not conform.
- D. After the conversation previously described, on or around December 2020, Jane Doe 4 was at Defendant's residence. Defendant provided her with alcohol. Jane Doe 4 describes being in the hot tub with John Doe 1 and John Doe 3. She stated that Defendant and John Doe 3 were telling John Doe 1 she should hook up with and "finger" Jane Doe 4. John Doe 1 repeatedly declined and said he knew Jane Doe 4 did not want to. They then yelled at Jane Doe 3 to just say yes. Jane Doe 3 stated she did not hear what was said to her, she responded "what?" John Doe 3 repeated, "just say yes." Jane Doe 4 then said "yes." After this Defendant continued to provide both Jane Doe 4 and John Doe 3 with alcohol.
- E. At some point, Jane Doe 4 said she was not feeling well and left the hot tub to go lay down in a room inside the residence. She describes feeling extremely intoxicated and going in and out of consciousness. Defendant brought John Doe 1 into the bedroom with Jane Doe 4, said she was leaving him in the room with her, and then exited. Jane Doe 4 described being too intoxicated to react or resist. John Doe 1 digitally penetrated Jane Doe 4 while she cried and covered her face with a pillow. Defendant returned and Jane Doe 4 said to her "Why did you leave me in there with him? Like why did you like do that? Like you knew like what he was going to do me. Like for 30 minutes that was like too long, like he can't do that." Defendant just laughed at Jane Doe 4's question. John Doe 1 was so intoxicated he does not remember digitally penetrating Jane Doe 4.

VII. December 19, 2020

- A. On December 19, 2020, John Doe 2 sustained a concussion. John Doe 1 and 2 (brothers), were at Defendant's residence with her son, John Doe 3, and they were drinking alcohol provided by Defendant.
- B. Defendant drove the minor boys around while they were drinking alcohol. She encouraged an unlicensed, underage minor to drive her SUV in the Los Gatos

High School parking lot, while John Doe 2 and John Doe 3, who were both intoxicated, hung on the back of the SUV. While the car was moving, John Doe 2 lost his grip, and fell from the SUV, hitting his head. He was unconscious for 20-30 seconds.

- C. Defendant and the other minors present attempted to place John Doe 2 in the car. However, because John Doe 2 was unconscious, they were unable to pick him up and repeatedly dropped him on the ground. A bystander saw this occur and asked the Defendant if they needed help. She told this bystander to “mind your business.” This witness called 911 to report what he observed. The Defendant and the minors finally placed John Doe 2 in the car, and Defendant drove them to the 7-11 to get ice for him. Officer Low from the Los Gatos Police Department responded to the area because of the 911 call and located Defendant’s vehicle. Upon contact he saw Defendant sitting in the driver seat, and John Doe 2 in the rear driver side seat. There was a large amount of vomit on the driver side back passenger door and inside of the vehicle. John Doe 2 claimed car sickness.
- D. Defendant stated she had to come pick up John Doe 2 and that she was going to speak to him when they got home. She also concocted a lie as to what should be told to John Doe 1 and 2’s parents.
- E. Defendant first drove John Doe 2 to her residence to change his clothes, as there was too much vomit. She then dropped off John Doe 2 near his residence. Defendant did not inform the parents of John Doe 2 of his condition. Nor did she drop John Doe 2 to his home; instead, John Doe 2, had to navigate his way from the street to his home, while heavily intoxicated and severely concussed.
- F. John Doe 2 spent the night vomiting, and almost drowned in the tub due to his intoxication. The next day, he had a very bad headache. After a doctor’s visit, it was confirmed he suffered a concussion.

VIII. December 31, 2020

- A. On December 31, 2020, Defendant hosted a party for five minors, and provided alcohol. Prior to the party, Defendant contacted some of the minors and asked what kind of alcohol they wanted so she could provide it.
- B. At the beginning of the night Defendant told Jane Doe 3 that she should hook up with everyone at the party.
- C. John Doe 1, Jane Doe 3 (age 14), John Doe 3, Jane Doe 4, and Jane Doe 6 were present at this party. All minors but Jane Doe 6 (age 14) were drinking while in the hot tub. Defendant was present during portions of this. Jane Doe 6 reports seeing John Doe 1 digitally penetrate Jane Doe 3 in the jacuzzi. She stated Defendant was sitting next to her while this occurred.
- D. Jane Doe 3 became so intoxicated she reports that she was repeatedly “drowning” in the hot tub because she was unable to keep her head above water. She was carried from the hot tub by John Doe 3 and Jane Doe 4 and placed in the upstairs bathroom where she remembers the Defendant being present while she was vomiting.

- E. John Doe 1 also became extremely intoxicated and does not remember leaving the hot tub. He was placed in the bathtub and vomited.
- F. Later that night, Defendant and the minors ended up in John Doe 3's bedroom. Jane Doe 3 felt sick, went to the bathroom, and John Doe 1 followed her. When Jane Doe 3 returned from the bathroom, she was crying and stated "He made me bleed. Like he made me bleed." Defendant responded to this by laughing, as if it were funny, stating "[John Doe 1] what did you do?".
- G. John Doe 1 was passed out in the bed later in the night. During this time, he woke up and touched Jane Doe 6 without her consent. Jane Doe 6 was sober and laying in John Doe 3's bed. John Doe 1, while inebriated, climbed on top of her, and began to touch her. Jane Doe 6 refused; however, John Doe 1 continued to touch her on the breasts and buttocks area. Defendant was in the room and laughed while Jane Doe 6 repeatedly told John Doe 1 to get off her. John Doe 1 states he was so intoxicated from the alcohol provided by Defendant that he has no memory of this occurring.

IX. February 15, 2021

- A. On or around February 15, 2021, Defendant provided minors with alcohol during a trip to Lake Tahoe. The provided alcohol included vodka, beer, white claws, and Truly's. The Defendant did not prevent the minors from drinking. She was the only adult present.
- B. Prior to the trip, Defendant concocted a story for Jane Doe 2's (age 14) parents to obtain their permission to allow Jane Doe 2 to go on this trip. Defendant conversated with Jane Doe 2's parents to reassure them her step-daughter would be sharing a room with Jane Doe 2, that there would be no alcohol present, and that the minor boys on the trip would not be allowed in the same room as Jane Doe 2. This was a lie, and Jane Doe 2 was the only girl present.
- C. Prior to this trip Defendant told Jane Doe 4 that Jane Doe 2 would be sleeping in the same room with John Doe 2 and another minor, commenting sarcastically "I hope nothing happens."
- D. Jane Doe 2 became extremely intoxicated on this trip. She reports stumbling and running into a wall. There is video evidence of Jane Doe 2, walking in a snow filled parking lot at night, in a bikini, while inebriated.
- E. When Jane Doe 2 returned from walking outside, she consented to kissing John Doe 3. Jane Doe 2 describes being in bed with John Doe 3 when John Doe 3 exposed himself. After this further sexual activity occurred. Jane Doe 2 describes being opposed to this, stating she did not want it to happen.
- F. Jane Doe 2's parents asked Jane Doe 2 to return from the trip early due to being informed of Defendant's criminal behavior. Defendant and John Doe 3 aided in creating a story Jane Doe 2 could tell her parents to deny any drinking allegations. Eventually, Jane Doe 2 admitted to alcohol being present.

X. September 18, 2020 – February 10, 2021- John Doe 1

- A. Defendant was known to message John Doe 1 multiple times every day, to the extent of being his "best friend" on Snapchat. Defendant would communicate

with John Doe 1 more than his actual friends. These messages would include conversation about girls Defendant believed John Doe 1 should hook up with. Defendant would also message John Doe 1 after he would be intimate with a girl and ask how the experience was for him and what sexual activity they engaged in.

- B. Defendant told John Doe 1 to “hook up” with one minor female who was friends with her son’s ex-girlfriend, Jane Doe 7. John Doe 1 did not want to, but Defendant told him to “take one for the team” stating this would be best for John Doe 3. Defendant would take John Doe 1’s phone while he was intoxicated and text this minor female pretending to be John Doe 1 so she would think John Doe 1 liked her. John Doe 1 ended up engaging in a sexual encounter with this minor female although he did not want to. After this Defendant asked him “how was it?”
- C. John Doe 1 is diagnosed with Crohn’s disease, an inflammatory bowel disease. This causes a person’s digestive tract to be inflamed, leading to abdominal pain, fatigue, weight loss, and malnutrition, among other side effects. Studies have shown alcohol intake triggers Crohn’s disease symptoms, and can negatively impact any IBD medications. Defendant was aware of John Doe 1’s condition and dietary restriction as she was informed by John Doe 1’s mother. John Doe 1 had a surgery scheduled because of his Crohn’s Disease that was postponed so he could attend John Doe 3’s birthday weekend in Santa Cruz from October 2, 2010-October 5, 2010. Defendant was aware of the need for the surgery as well as its postponement. Despite this, on multiple occasions, Defendant provided copious amounts of alcohol to John Doe 1 to the point where he vomited and went unconscious.

XI. March 26, 2021

- A. Jane Doe 4 informed her mother about John Doe 2’s concussion while he was intoxicated. Her mother contacted the Los Gatos High School, and mothers from the school community. The school spoke first with John Doe 3 about the incident.
- B. John Doe 3 approached John Doe 1 and John Doe 2 and asked them to lie about the incident to ensure Defendant would not be in any trouble.
- C. After the incident, Defendant told John Doe 1 to inform anyone who asked that John Doe 2 had been drinking with “random kids” and tripped and fell. She also persuaded John Doe 1 and John Doe 2 to lie to their parents.
- D. The Vice Principal of the school met with John Doe 1 and John Doe 2 over Google Meet. Defendant contacted John Doe 1 to persuade him to lie about what happened and deny that John Doe 2 hit his head on school campus. John Doe 3 and Defendant used Snapchat to provide exact statements to John Doe 1 and 2 during this meeting.
- E. John Doe’s 1 and 2 were dissuaded, and lied about drinking, Defendant’s presence, and how John Doe 2 was injured at the direction of Defendant.

XII. April 30- May 3, 2021

- A. Jane Doe 8 (age 16) and Jane Doe 9 (age 16), twin sisters, came to Defendant’s residence on or around April 30, 2021, from Eagle, Idaho. Prior to this, Jane Doe 8 met and communicated with John Doe 3 for months online; they eventually

began to date. Jane Doe 8 and Jane Doe 9 were only allowed to visit Los Gatos after Defendant assured their mother they would be monitored, they would not consume any alcohol, and the girls would have their own sleeping quarters.

- B. Defendant provided alcohol to the minor girls and Defendant allowed John Doe 3 and Jane Doe 8 to have a sexual relationship. Defendant asked Jane Doe 9 multiple times if she wanted to have a sexual relationship with another minor boy present.
- C. Defendant began to message Jane Doe 8 and provided her prompts of excuses to tell her parents and began to groom her in how to act. Defendant additionally created a new Snapchat account in attempts to contact Jane Doe 8.

XIII. Other Conduct Directed Toward Minors

- A. Defendant's son, John Doe 3, was previously in a dating relationship with Jane Doe 7 (age 14). During their relationship, if Jane Doe 7 did not wish to participate in sexual activity with John Doe 3 Defendant would pressure her by stating that if Jane Doe 7 would not "do sex stuff" with John Doe 3, she does not love him or care about him. When Jane Doe 7 ended the relationship with John Doe 3, Defendant falsely claimed John Doe 3 was suicidal to entice Jane Doe 7 to continue communication with him. Jane Doe 7 was provided alcohol by Defendant from around October 10, 2020 to February 1, 2021.
- B. During parties, Defendant would have rooms available for minors to engage in sexual activity. She would also tell minor girls to go into certain rooms with minor boys waiting for them. If girls refused, Defendant would take them aside for a private conversation until they would go into the rooms.
- C. Defendant targeted a specific minor girl, to the point of pressuring her into hooking up with multiple people, even if she did not want to or was too intoxicated to consent.
- D. On one specific occasion, Defendant asked a minor girl if she wanted to have sex with a minor boy. The minor girl's answer was no. Defendant then asked her again. The minor again responded no. Defendant then said there was more alcohol coming and to let Defendant know if she wanted anything specific ordered.
- E. Defendant would ask minor girls if they wanted to partake in sexual activity with certain minor boys who showed interest in the girls. If the girls did not want to do that, Defendant would ask multiple times if they were sure.
- F. During the weekend of April 30, 2021, Defendant learned Jane Doe 4 was in the same vicinity as her. Defendant drove by Jane Doe 4, stopped her car to stare at her, and watched Jane Doe 4, who was visibly scared, run away. At John Doe 3's behest, Defendant tried to find Jane Doe 4 again, but failed.
- G. On multiple occasions at Defendant's residence, Defendant watched a minor boy physically assault Jane Doe 4 by punching and kicking her while she was intoxicated. Jane Doe 4 suffered heavy bruising from these incidents.
- H. Defendant would facilitate minors sneaking out of their homes during the middle of the night or early morning without their parent's knowledge or consent. She would communicate with minors via snapchat or text message, and then pick up

the minors down the street from their home and drive them to her residence. She would then provide them with alcohol.

- I. All the victim's mentioned attended multiple social gatherings at Defendant's home where she provided them alcohol during the date ranges listed in the complaint.

Based on the investigation described above, I believe Shannon O'Connor committed the acts named in the complaint, including multiple acts of Child Abuse likely to Cause Great Bodily Injury of Death, Sexual Battery, Annoying or Molesting a Child, Providing Alcohol to Minors, and Child Abuse Not Likely to Cause Great Bodily Injury of Death.

I declare that the forgoing is true and correct to the best of my knowledge under the penalty of perjury of the laws of the State of California

DocuSigned by:
Christina Hanks

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Investigator Christina Hanks #4K96
Santa Clara County District Attorney's Office

Date: October 6, 2021