

DISTRICT COURT OF MARYLAND FOR Montgomery

(City/County)

LOCATED AT (COURT ADDRESS)

191 E. Jefferson Street
Rockville, Maryland 20850

DISTRICT COURT
CASE NUMBER

DOB CR 24 002 336

DEFENDANT'S NAME (LAST, FIRST, M.I.)
YE, Andrea

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 2 of 12

On March 3, 2024, a subject known to Sergeant Saffar and hereafter referred to as Witness-One contacted Baltimore Police to report that he received an Instagram message from a subject he knows as Alex Ye. It is noted that Witness-One knows Alex Ye because the two were in inpatient treatment at a known psychiatric facility in Maryland.

Witness-One reported Ye stated he finished writing "his book" and wanted to share it with Witness-One. Ye stated it was a fictional story/manifesto about a high school shooting. Ye then provided a link to the manifesto via Google Drive via his known email address through Instagram chat.

Witness-One began reviewing the "18 chapter" manifesto and noted striking similarities between the main character (James Wang) and Ye. The story focused on a transgender main character being bullied in school and other issues that Witness-One believed were directly from Ye's life and not indicative of fiction. Witness-One stated the book indicated that the shooting was to take place "the next day" saying "I will be doing it tomorrow".

Witness-One did not finish reading the document, and instead contacted Baltimore County Police to state that they believed a school shooting by Ye was imminent. As a result, Rockville City Police were contacted and conducted a welfare check at Ye's residence. As noted by Rockville Police, XUAN YE (father of Alex Ye) stated he was not concerned with YE's current mental status because when YE is going through a mental crisis, he can see a visible change with YE. XUAN YE stated if YE was having any thoughts of harming anyone, he feels confident that YE would confide in his therapist. XUAN YE stated he is aware that YE spent several months writing a novel and was very adamant that this novel was a fictional novel. However, XUAN YE stated he has not read any part of the novel. Ye's family did not consent to police entering the home or searching Ye's room and did not allow officers to view the manifesto- telling police they would need a warrant.

Shortly after police responded to Ye's residence, Ye revoked access to the document from Witness-One. Witness-One did not finish reading the document and did not know if additional information relating to details of a school shooting existed in the document. Sergeant Saffar of the MCPD BAAU/Threat Assessment Team was notified of the event on 03/04/2024. Sergeant Saffar immediately recognized Alex Ye from prior threat assessment investigations.

**In December of 2022, Alex Ye was hospitalized for threatening to "shoot up a school", homicidal, and suicidal ideations. He was reported to be released from the hospital in January 2023. In January 2023 it was determined that Ye was still preoccupied with self-harming, school shootings, and explosives. On January 31, 2023, the Montgomery County Crisis Center contacted Rockville City Police to assist clinicians with the service of an Emergency Evaluation Petition (EEP) of Ye. Ye was EEP'ed because he was again having homicidal and suicidal ideations. Crisis Center staff advised Alex made statements that he wanted to "Shoot Up" his school and that he had made statements referencing suicide by cop. Ye was referred to the Crisis Center by a Wootton High School therapist, as a result of information he recently obtained a BB gun for the purpose of suicide by cop. It was determined by Montgomery County Police that Ye was able to purchase this BB gun on Amazon, without his parent's knowledge.

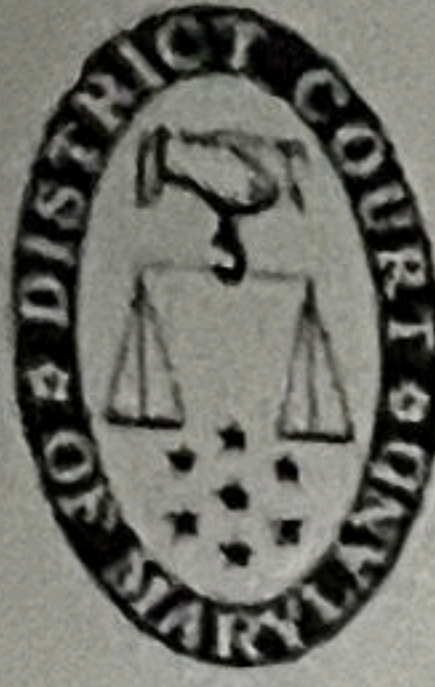
As reported to MCPD and FBI investigators, from approximately 02/20/2023 to 07/20/2023, YE was hospitalized at Johns Hopkins Pediatric Unit for the homicidal ideations. YE also claimed to be Jesus Christ and was going to crucify himself. When YE was discharged, he was sent to a residential facility. [Per known Doctor at Suburban Hospital]

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Sgt J. Saffar
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191 E. Jefferson Street
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DO6CR24002336

DEFENDANT'S NAME (LAST, FIRST, M.I.)

YE, Andrea

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 3 of 12

On 03/04/2024, Sergeant Saffar spoke with Witness-One by phone. Witness-One confirmed he was concerned about the document and believed it was indicative of Ye's plan to commit a school shooting. Further, Witness-One confirmed the document contained information that appeared to be directly about Ye's life including being about an Asian male main character, who is transgender, has problems in his home life, and wishes to complete a school shooting. Witness-One knew Ye was in treatment for suicidal and homicidal thoughts including wanting to commit a school shooting and believed that he still had those thoughts. Witness-One knew Ye had wanted to commit a school shooting at his high school. Witness-One advised that he and others in group treatment felt that Ye was consistently lying during treatment and despite saying he no longer had homicidal/suicidal thoughts, had alluded to other patients in private that he did. Witness-One stated he did not know why Ye chose to share the document with him and stated he knew it had been shared with at least one other person.

On 03/05/2024, Sergeant Saffar authored and was issued a search warrant for Ye's Gmail account which had shared the manifesto, for the limited date range of March 1-March 4, 2024.

Sergeant Saffar notes that the search warrant was only for user history for 3 days. However, during that period the following items were searched for and based on the time stamp, appear to have been searched for AFTER RCPD responded to the residence and spoke with YE. Further, these searches were after YE stated to witness that he had completed his book and sent it to him.

Search History:

- Visited- gun range near me - Google Search -Mar 5, 2024, 1:43:54AM UTC
- Visited- minimum age to enter a range - Google Search -Mar 5, 2024, 1:43:44AM UTC
- Visited- written description of ar-15 - Google Search-Mar 4, 2024, 12:26:26AM UTC
- Visited- verbal description of ar-15 - Google Search -Mar 4, 2024, 12:26:21AM UTC
- Visited- But, I do recognize that my plan is fully unethical. It's selfish and evil. - Google Search Mar 4, 2024, 4:18:51PM UTC
- Visited- Books like Forgive Me, Leonard Peacock by Matthew Quick - Google Search - Mar 2, 2024, 11:30:20PM UTC
- [note: This book is about a high school student who plans to shoot his best friend and then kill himself]
- Visited- Long term prison sentences make no sense : unpopularopinion - Reddit -Mar 4, 2024, 7:42:52PM UTC

Sergeant Saffar also located the referenced document/manifesto pursuant to the search warrant. Sgt Saffar notes the document is 129 pages. Sergeant Saffar notes the document opens up with a disclaimer. [This is a work of fiction. All the names, characters, businesses, places, events and incidents in this book are either the product of the author's imagination or used in a fictitious manner. Any resemblance to actual persons, living or dead, or actual events is purely coincidental. This is not a threat of violence, nor does it represent the author's beliefs.]

The document tells a story of a subject (James Wang) who plans a school shooting, but ultimately is taken into custody by law enforcement and goes to psychiatric treatment (mirroring the event that took place in 2023 for YE).

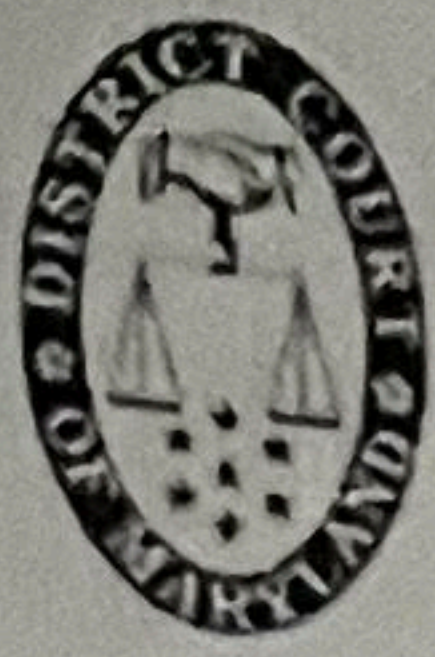
A sampling of pertinent excerpts are outlined below:

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YE, Andrea

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 4 of 12

Pg 1: I want to shoot up my school. I've been preparing for it for the past few months. As I sit in front of my dad's gun case and stare at the sleek, black gun inside, all I can think about is my finger on the trigger, taking aim, and killing people. The gun is an AR-15 style semi-automatic rifle. It's the kind of gun with a long barrel and a stock you put up against your shoulder. This gun is going to change lives tomorrow.

Pg 2: As I walk through the hallways, I cherry pick the classrooms that are the easiest targets. These ones are close to the entrance and have windows in the doors. I need to figure out how I'll sneak the gun in. Maybe a duffel bag will work. I just hope security doesn't stop me.

Pg 2: Though I enjoy the hunting aspect of guns, I have contemplated making bombs. The instructions to make them are surprisingly available online. I could build one with a pressure cooker and remote control car. Or I could make chemical weapons through mixing ammonia and bleach. The problem with that is that it would require a gas mask and bombs are time consuming to build.

Pg 3: I have also considered shooting up my former elementary school because little kids make easier targets. And, I run the risk of getting attacked or tackled midway through with high schoolers. I also hated elementary school. The teachers were evil and the other students were little assholes. I always got in trouble and had to sit out during recess. The other kids would pretend to be my friends but make fun of me to my face. It would be the perfect revenge.

Pg 3: High school's the best target. I'm the most familiar with the layout, I know where the doors with windows are, and it's the most convenient to enter. Truthfully, I would rather become a serial killer than a mass shooter. Serial killers are romanticized a lot more. They get tons of love letters and Netflix documentaries about them. Mass shooters are brushed off unless they are truly unique or good-looking.

Pg 3: It'd be hard to tell me apart from the hundreds of other Asian guys at my school in a police lineup. My school is mostly Asian and white. It's in upper-middle class Rockville. It's a suburban city in Maryland where almost everyone goes to college.

Pg 8: I pace around my room like an evil mastermind. I've put so much effort into this, it has to go well. I don't bother posting any cheesy "Don't go to school tomorrow if you value your life" posts for my hundred or so Instagram followers. The last thing I want is to get reported and get a SWAT team sent to my home. I picture the news stories. Deranged killer slays 17. There were no signs, says family and school. Twenty dead, fifteen injured at Rockville school. I plan on shooting myself once the police get there, so I will never be able to see the news stories. I am pretty scared. What if I fail at killing myself and live the rest of my life disabled and serving a life sentence? Maryland doesn't even have the death penalty, which would be preferable in my opinion.

Pg 20: Millions of people die each day of cancer, old age, etc. and it's no big deal. But shoot someone and suddenly everyone is all concerned. The news reports on it, and protests for gun control happen. Nobody can escape death in the end. Why does it matter who delivers the final blow? It would bring me a lot of joy and satisfaction to kill, so it's kind of worth it, in a way.

Pg 38: There's a newspaper announcing a new mass shooting at an elementary school. The kill count isn't very high. I could probably beat it. My ultimate goal would be to set the world record for the most amount of kills in a shooting. If I have enough time, I'll try to decapitate my victims with a knife to turn the injuries into deaths.

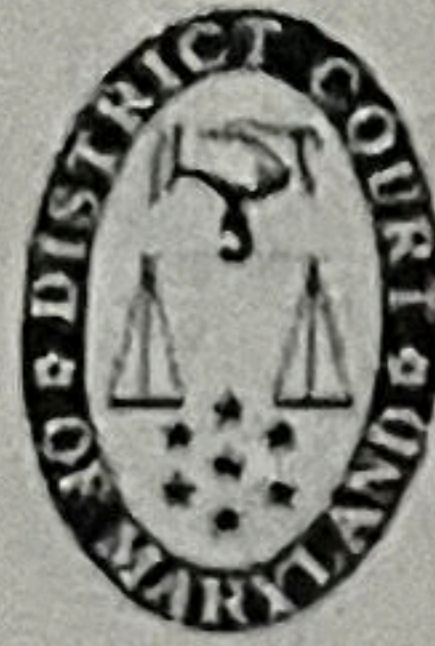
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DISTRICT COURT OF MARYLAND FOR Montgomery

(City/County) 70

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DEFENDANT'S NAME (LAST, FIRST, M.I.)

YE, Andrea

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 5 of 12

Pg 38: I don't get why people hate school shooters so much. I'd be thrilled to be part of a mass shooting. It'd be the most exciting time of my life. I'd either help the shooter out or take a chance at being a hero and fight the shooter with my scrawny arms. I'd probably lose and die

Pg 41: I really want to be famous. Even infamous.

Pg 68: If I had the ingredients to make a bomb, I would blow this whole building down. I would mix whatever acid with whatever base, set a timer with some electronic device, then walk away from the action-movielike blast. Dr. Wilson can die in flames, begging for my mercy. I'd feel like a supervillain.

Pg 71: I'm scared that I'll turn out just like my parents. My parents thought that they could break the cycle of being bad parents because their parents hit them and they never hit me. Maybe I think the same way. But the truth is, I sometimes think I'm a pedophile. I get turned on by little kids and want to touch them the same ways I was touched. I know this is wrong. I have never acted on it, and don't plan to ever. I disgust myself. The pedo thoughts definitely freak me out more than any other thought I've had, even the mass shooting

Pg 92: "Antisocial disorder means you're a sociopath," Damian says. That does sound kind of cool, in a way. "And bipolar people are creative and crazy. If you're bipolar, you get manic episodes where you get really happy and might even start believing that you're God." I hope I have those disorders now. Bipolar actually sounds really fun.

Pg 122: I reply to them then open Google. I type: School shootings. A whole Wikipedia page pops up dedicated to school shootings. I navigate to the Nashville school shooting. Oh shit, I should make sure my door is locked or else they might take away my phone. I lock the door and flop down on my bed. The shooter was also trans. His name was Aiden Hale, though the news keep calling him Audrey. Makes me want to change my name legally before I commit a shooting to make sure the news doesn't misgender me. He was suicidal before the shooting. Just like me. He, too, wanted to kill little kids. A rush of adrenaline fills my body. He's so relatable.

Pg 129: I hope that I live a good life. And I hope that I don't kill anyone

On 03/06/2024, Ye was evaluated at his residence and taken to Suburban Hospital on the strength of an Emergency Evaluation Petition.

On 03/13/2024, Sergeant Saffar was alerted that Suburban Hospital staff were concerned enough with the threat posed by Ye that they felt they were required by law to break confidentiality to notify law enforcement and Wootton High School. The FBI was also notified.

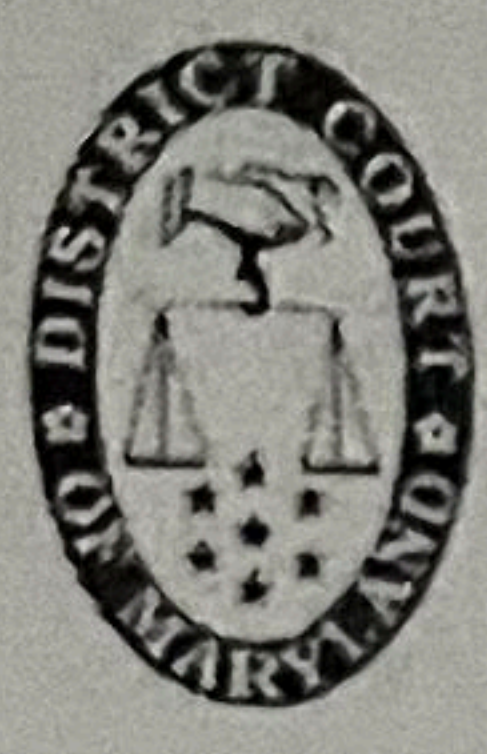
On 03/15/2024, FBI agents interviewed a known-counselor with the Wellness Center at Wootton High School. The following information was obtained in the form of interview notes from the FBI:

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DEFENDANT'S NAME (LAST, FIRST, M.I.)
YE, Andrea

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 6 of 12

The Counselor worked with YE from approx. Oct 2022-Feb 2023. In their sessions, YE would express violent thoughts such as shooting up the school, wanting to hurt other people, and would smile while saying it. When asked how he would do it, YE said he'd bring a gun and shoot up the school. YE would tell her he was looking up on the Internet how to get a gun and how to get into the school, laws, and certain loopholes. The Counselor described YE as patient and okay with his plan being the "long game" and wanted to be famous from this event. YE did say he wanted to shoot up Wootton HS and "his elementary school", but never stated the name of the elementary school. The Counselor knows the school to be Lakewood Elementary. YE would talk about committing these violent acts at graduation. Ye provided no specific people named in his threats of violence, always just Wootton/or the reference to his elementary school. Throughout their 5 (five) months of sessions, YE remained fixated on school shootings and made statements every time they spoke (which was often) about committing a school shooting. Regarding being trespassed from the school, YE would say that even if he's not allowed in school he can do something at graduation or could walk to Wootton because he lives so close to the school.

YE has said things to the Counselor and then followed through on them, ie. - he told her he wrote an "autobiography".

On 03/19/2024, Sergeant Saffar and members of the FBI responded to Suburban Hospital to speak with Ye. Ye asked if he could refuse to speak and then declined to speak with the group. Ye was then asked 'when we conduct a search on your room today, is there anything in your room that could hurt us' (paraphrased), Ye paused for a brief period of time and said "I'd rather not answer." Ye then left the interview room.

Sergeant Saffar and the FBI agents continued speaking with Ye's treating Psychologist at Suburban Hospital. The known person provided the following information:

Ye had referred to the manifesto as "his memoir." This further showed that the referenced manifesto demonstrates a planned threat and was not a total work of fiction. Additionally, Ye disclosed to treatment staff that he had previous thoughts of sexual contact with children. It is noted that the manifesto's main character acknowledges having pedophilic thoughts. Ye also disclosed that he has been sexually abused and CPS declined the case, the main character also reports being abused and CPS had declined the case.

Additionally, Ye disclosed to hospital staff that he is routinely searching for "mass shootings" and "school shootings" via the social media app Discord. Hospital Staff advised Ye has previously disclosed to psychiatric staff during his in-patient treatment that he had thoughts of a mass attack at his elementary school and high school. The manifesto's main character states he plans on shooting at his high school, but also thought about shooting elementary school children. As the manifesto stated, "I have also considered shooting up my former elementary school because little kids make easier targets" (page 3).

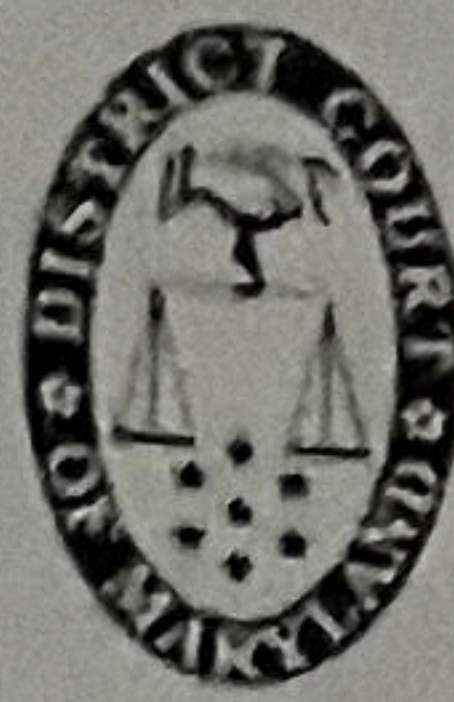
Based on the above, it appears that the "manifesto" has portions of fictional and non-fictional qualities and is based on reality with a plan of Threats of Mass violence.

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DO6CR2400 2336

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YE, Andrea

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 7 of 12

As a result of the above, Sergeant Saffar requested a search and seizure warrant for Ye's residence, which was executed at Ye's residence on March 21, 2024. During the search, an Apple iPhone, Apple iPad, HP laptop, and other laptop were located. Ye's mother confirmed these were used by Ye. The devices were seized and brought to a secure police facility located within Montgomery County, Maryland. The devices were reviewed as a result of valid search warrants with the assistance of the Federal Bureau of Investigations.

During the search, it was determined that YE received an email from Discord to his known Gmail account indicating the email had been disabled for violating terms and conditions. As stated by Discord "Your account posted content that glorifies or promotes physical or sexual violence against individuals or communities, or was involved in servers dedicated to such content."

Reviews of messages that were located include the following:

Through Discord, on 03/05/2024, @mailbox0542#0 (identified as Ye's account) sent the following message: "My friend reported me to the police for a book I'm writing."

A review of the messages on 03/06/2024 in Discord channel ID 1214418969201737739 revealed conversations surrounding the Columbine High School shooting (which took place on April 20, 1999). Sergeant Saffar notes that 25th Anniversary of this massacre is August 20, 2024 and previous copycat school shooters have used this anniversary date to plan similar style school shootings / targeted mass violence incidents to pay tribute to these events.

User @smear3#0 asked, "do yall want the link to the full 3 hours and 30 mins of the columbine security tape? it literally shows everyhting [sic] from that day." User @sophielanza#0 replied "I already have it", to which @smear3#0 responded, "i know youd already have it lel." User @mailbox0542#0 replied "Yes" and user @smear3#0 sent a link to a us.archive.org video with the following description in the URL: "columbine-high-school-cafeteria-cctv-videotape-full-april-20-1999." User @smear3#0 also refers to this particular Discord channel ID group as the "Retarded Nations Trenchcoat Mafia", to which user @adamlanza019#0 replied, "Why if is the name changed." User @smear3#0 then clarified, "its the retarded nations version of the trenchcoat mafia." Sergeant Saffar knows that school shooters often create a tribute to the Columbine Shooters by using trenchcoats or similar clothing as an homage to the shooters.

Sergeant Saffar knows that Adam Lanza was the Sandy Hook Elementary School shooter, the individual who user @adamlanza019#0 likely based his username. Based on the above, Ye appears to be in a Discord Chat group with other subjects who are focused on glorifying school shootings.

Additionally, a review of the phone found handmade drawings depicting shooting scenes with the shooter being labeled as "Me" and others listed as "you". Additionally, a hand-drawn image with the words "Confessions of an Almost School Shooter Alex YE" with what appears to be a drawn gun were also located and a map of Wootton High School (Rockville, Montgomery County, Maryland).

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D06 CR 240 02336

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APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 8 of 12

On 04/10/2024, as a result of a search warrant, Sergeant Saffar received the content of Ye's Instagram chat logs (identified as alexye01, Instagram ID# 801313632). The following messages were considered noteworthy:

Sent - 2023-09-26 19:47:17 UTC
I hate that I can't be honest w my therapist bc I'd end up in the state hospital or jail

Sent - 2023-09-26 19:48:22 UTC
But technically what i say counts as "terroristic threats" and that can be a felony

Witness-One - Sent -2023-09-26 19:48:33 UTC
What do u wanna do?

Witness-One - Sent- 2023-09-26 19:48:36 UTC
No judgement btw

Sent - 2023-09-26 19:48:58 UTC
[Emoji of school, gun, bomb, skeleton]

Witness-One -Sent- 2023-09-26 19:49:17 UTC
Shoot and bomb ur school?

Sent -2023-09-26 19:49:27 UTC
[Emoji of thumbs up]

Witness-One - Sent - 2023-09-26 19:49:35 UTC
Why?

Sent - 2023-09-26 19:49:41 UTC
Idk just seems fun

Sent -2023-12-22 22:19:50 UTC
My homicidal ideation has been getting worse lately to the point I might act on it eventually

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[Signature]
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Sent 2023-12-24 22:35:30 UTC
And seeing them dead

Sent - 2023-12-24 23:40:25 UTC
I'd want to kill a lot of people or it wouldn't be worth it

Sent - 2023-12-24 23:43:28 UTC
Once I move to a diff state I can buy guns

Witness-One - Sent- 2023-12-26 19:56:47 UTC
What's ur worst intrusive thoughts

Sent 2023-12-26 19:57:01 UTC
Mass shooting and child abuse
Sent 2023-12-27 01:17:23 UTC
So if kids are hiding in a classroom I can draw them out

Witness-One - Sent - 2023-12-27 01:38:04 UTC
What's stopped u from shooting up a school before

Sent - 2023-12-27 01:38:10 UTC
Not having a gun

Sent - 2023-12-27 01:38:43 UTC
Not wanting to do it before having a well thought out plan

Sent - 2023-12-27 01:38:56 UTC
Not wanting to do it before publishing a book and running for office

Sent - 2023-12-27 01:39:10 UTC
Bc I want someone to do it with me

Sent - 2023-12-27 01:39:34 UTC
I want to have a better online presence and have a glow up so more people simp for me

Sent - 2023-12-27 01:40:36 UTC
But mostly that I don't have a gun

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APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 11 of 12

Sergeant Saffar obtained a search warrant for YE's google/Gmail history. The following searches were observed by the FBI in conjunction with search results from Ye's computers, iPhone and iPad- were also were searched as a result of valid search warrants.

Google searches -

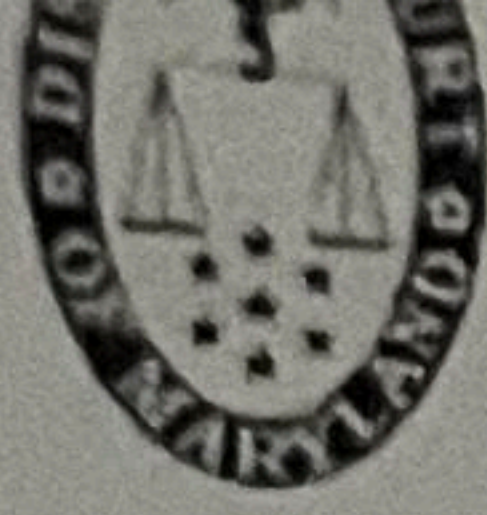
- o sandy hook shooting game - 12/25/2023
- o 2023 mass shootings - 01/15/2024
- o school shooter news - 02/27/2024
- o parkland shooter sentence
- o april 2023 mass shootings
- o nashville school shooting
- o how many people did adam lanza kill [Note: As previously noted, Adam Lanza was responsible for the Sandy Hook Elementary school shooting, which took the lives of 26 people- including 20 children].
- o bomber killed 19 children
- o anarchist cookbook - 8/18/23 [Note: Sergeant Saffar knows the anarchist cookbook is a book published in 1971 that includes instructions for making bombs and explosive material. Many persons found guilty of Mass Violence have been found to have used this book in their planning. Sergeant Saffar noted that Ye described learning how to make bombs in chats with Witness-One]
- o anarchist cookbook pull pdf - 8/18/23
- o what counts as a terroristic threat - 9/26/23
- o threats of mass violence - 1/1/24
- o salad days song nikolas cruz - 9/29/23 [Note, Parkland School shooter (Nikolas Cruz) admitted "Salad Days" was one of the songs he listened to while committing the shooting. Sergeant Saffar notes this song has become associated with school shootings/targeted mass violence as a result].
- Browser web history -
 - o Behavioral threat assessment of Audrey Elizabeth Hale - 01/30/2024 - [Note, Birth name of Aidan Hale; responsible for the 2023 Nashville School Shooting- responsible for the death of three (3) nine-year-old children and three (3) adults. This event was the most deadly mass shooting in Tennessee history]
 - o Aiden Hale - 01/30/2024
 - o Robb Elementary shooting [Note: This took place on 5/4/2022 in Uvalde, Texas. A former student fatally shot 19 students, 2 teachers and wounded 17 others. He was 18 years old.]
 - o Parkland high school shooting [Note: This took place on 2/14/2018 when 19 year old Nikolas Cruz, a former student, killed 17 students and staff at Marjorie Stoneman Douglas High School. 17 others were injured.]
 - o Monterey park shooting [Note: On January 21, 2023 a suspect shot and killed 11 people and injured 9 others in Monterey Park, California before committing suicide. The shooter was an Asian American male targeting Asian Americans.]
 - o Chardon high school shooting
 - o Sandy hook shooting

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APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 12 of 12

Sergeant Saffar notes the referenced manifesto was communicated to others and threatens action that would place more than five people at substantial risk of death or serious physical injury if carried out.

As a result of the above information, Montgomery County Public Schools, specifically Wootton High School have had increased security precautions in place as a result of a valid concern of a school shooting. Montgomery County Police has increased officer presence outside of the school to act as a visual deterrent.

Sergeant Saffar notes that Alex Ye's lawful and legal name is Andrea Ye. This statement of probable cause referred to Ye with the name they identify as and male pronouns. However, for legal purposes, it is recognized that the subject's legal name is Andrea Ye, an Asian female with date of birth, 01/07/2006.

Attached to this statement are images located by the FBI from Ye's electronic devices, obtained while executing search warrants on the devices. One is a map of Thomas S. Wootton High School, where Ye had attended school. The other is a drawing that depicts a shooting with multiple victims and labels the shooter "me".

Based on the above, Sergeant Saffar in conjunction with the Montgomery County State's Attorney Office requests the following charge be placed against Andrea Ye (aka Alex Ye) in the form of a warrant:

I_1335 ****THREAT OF MASS VIOLENCE**** ...did knowingly threaten to commit a crime of violence under CR 14-101 to wit: school shooting and bombing, that placed the victims of Montgomery County Public Schools, specifically Wootton High School, at least five people at a substantial risk of death/serious physical injury if the threat were carried out.

All events occurred in Montgomery County, Maryland.

4/16/24
Date

Applicant's Signature
Sgt J. Saffar
Printed Name

TRACKING NUMBER