

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT
AND ARREST WARRANT**

This affidavit is submitted by Detective Sergeant Jeffrey Janczyk in support of a criminal complaint and an application for an arrest warrant relating to:

Corbin Oliver Gray (hereinafter referred to as “the defendant”), a United States citizen last known to reside in Ellicott City, MD.

I respectfully submit that there is probable cause to believe that the above-identified individual has committed the following criminal offenses in violation of United States law:

18 U.S.C. § 844(e) (Threats in or affecting interstate commerce to kill, injure, or intimidate an individual or to damage or destroy property by means of fire) and 18 U.S.C. § 875(c) (Threats in interstate communications).

DETECTIVE BACKGROUND

1. I am a Detective Sergeant with the Metropolitan Police Department and have been so employed as a sworn law enforcement officer since 2004. I am currently assigned to the Joint Terrorism Task Force of the Federal Bureau of Investigation, having held that position since 2016. I have held previous assignments in the Criminal Intelligence Branch as an Officer, a Detective, and a Detective Sergeant, the Narcotics Special Investigation Division as a Sergeant, and the Criminal Investigation Division as a Detective. My primary duty at the Joint Terrorism Task Force is the investigation of domestic terrorist activity, in addition to the assessment of incoming threats. My responsibilities with the Metropolitan Police Department include Threat Assessments, Social Media Investigations, and providing instruction to the Metropolitan Police Department and surrounding jurisdictions on Social Media Investigations Methods and Tactics. Throughout the duration of my career with the Criminal Intelligence Branch, my primary job was investigations

of protest activity with a criminal nexus in violation of federal laws – i.e., threats that falls outside of the protections afforded by the First Amendment.

2. I have received investigative instruction from the Maurice J. Turner Institute of Police Science. I have completed the Metropolitan Police Department's Basic Criminal Investigator Course. I have attended the Metropolitan Police Department's Vice School. I have attended the Maryland State Police Top Gun Narcotic Investigator's Course, and served as a shadow instructor in both the Maryland and Pennsylvania Top Gun Courses. I have received training from Intelligence Support Systems Telestrategies Online Social Media and Internet Investigations, Understanding Telecommunications, Basics of Internet Intercept for Law Enforcement, Visual Analytics for Detecting Criminal Patterns, Operators and Lawful Interception, Lawful Interception and Criminal Investigations, Criminal Investigations, Data Retention and Regulatory Compliance, Lawful Interception and Cyber Security, Semantic Technology for Intelligence Gathering and Analysis, Metadata and Visual Analytics for Intelligence Gathering, Mass Interception and Social Network Monitoring, Cyber Threat Detection, Threat Detection and Network Penetration, Encrypted Traffic Monitoring, Mobile Intercept, Electronic Surveillance, Temporal Analysis on Dark Web Investigations, Metadata Retention, Encrypted Traffic Monitoring and IT Intrusion, and Technical Surveillance Countermeasures. I have received training from the Office of Investigative Technology in Investigating Social Networks and Website Exploitation. I have completed the Joint Terrorism Task Force Operations Course and the Terrorist Trends course provided by the Federal Bureau of Investigation. I have provided instruction to the Metropolitan Police Department, Arlington Sherriff's Department, Fairfax Sherriff's Department, Prince Georges County Police Department,

and Department of Homeland Security on Social Media Investigations, Internet Safety, and Urban Tracking and Surveillance.

3. I have personally participated in this investigation and have witnessed many of the facts and circumstances described herein. I have also reviewed information from other federal and state law enforcement officials relating to this investigation. The statements contained in this affidavit are based on my own observations, witness interviews, document reviews and reliable information provided to me by other federal and foreign law enforcement officials. Because this affidavit is submitted for the purpose of seeking the issuance of a criminal complaint and arrest warrant, it does not include every fact known to me concerning the investigation.

JURISDICTION AND VENUE

4. This Court has jurisdiction and venue to issue the requested warrant because, as discussed more fully below, acts or omissions in furtherance of the offenses under investigation occurred within Washington, D.C. *See* 18 U.S.C. § 3237.

5. Title 18 United States Code Section 844(e) criminalizes “[w]hoever, through the use of the mail, telephone, telegraph, or other instrument of interstate or foreign commerce, or in or affecting interstate or foreign commerce, willfully makes any threat, or maliciously conveys false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of fire.”

6. Title 18 United States Code Section 875(c) criminalizes “[w]hoever transmits in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another.”

FACTS SUPPORTING PROBABLE CAUSE

Investigation Background

7. The FBI has been investigating reports that the defendant, a Maryland resident, has engaged in criminal activity in violation of 18 U.S.C. §§ 844(e) and 875(c) that involves traveling and transmitting threats of violence in interstate commerce in furtherance of a political or social ideology.

8. The investigation has revealed that the defendant is a self-identified autistic individual with multiple social media accounts that espouse anti-Applied Behavior Analysis (ABA) ideology. The defendant has promoted his ideology through various platforms and has taken physical actionable steps against supporters and providers of ABA, specifically Board Certified Behavior Analysts (BCBA).

9. Based on my training and experience, I am aware that in the Autism Community, ABA is considered a controversial form of one-on-one therapy used to change behaviors. The defendant's ideology demonstrates that he sees those with opposing views as trying to eliminate the culture, identity, and ultimately, the existence of the Autistic populace.

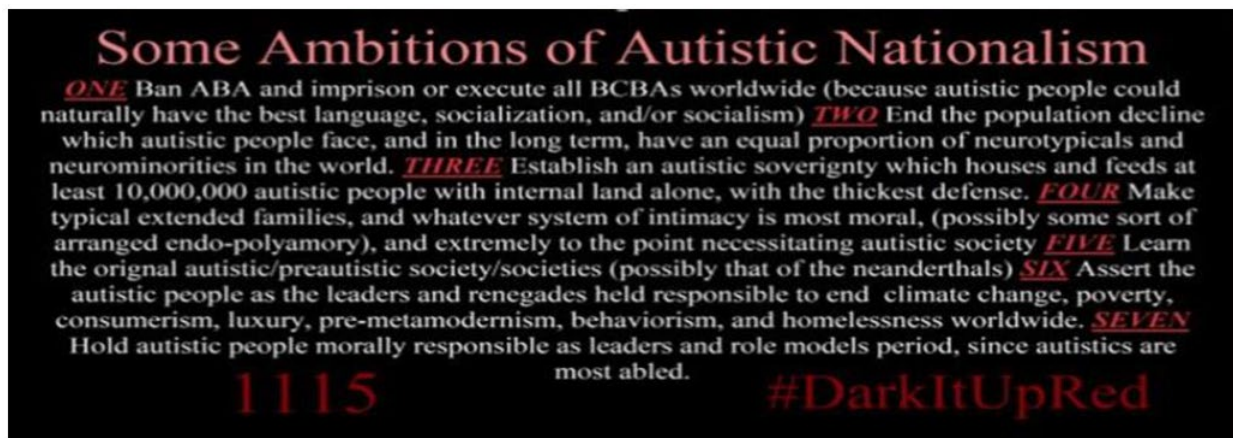
Reporting

10. On November 29, 2022, a representative of Autism Speaks reported to members of the Metropolitan Police Department that an unknown male (later identified as the defendant) had uploaded a video to Twitter depicting himself walking inside the Autism Speaks DC Headquarters, located at 1990 K Street NW, Washington DC, without authorization. The defendant used the Twitter Account @LeAshatistic and the YouTube Account @PointofNoReturn2004.

11. Both Twitter and YouTube are global social media platforms. Both platforms allow account holders to post images and videos that can be viewed by others worldwide. By posting such images and videos, account holders have the ability to share content through interstate and foreign commerce.

12. In the video, which was determined to have been taken on November 15, 2022, the defendant walked around the office filming different areas of the building and described that he was able to break in by falsely telling the custodial staff that he was a building employee. By using such deception, the defendant succeeded in having the custodial staff badge him into a secure area of the building.

13. The defendant left a flyer at the directory of the building, which advocated for the execution of practitioners of ABA, which is promoted by the Autism Speaks organization. Specifically, the flyer stated that an ambition of “Autistic Nationalism” was to ban ABA and imprison or execute all BCBAs (Board Certified Behavioral Analyst) worldwide. A copy of the text of the flyer is depicted below:



14. Further investigation revealed that the defendant had posted several videos on his YouTube account that identified himself as an “Accelerationist” and an “Autistic Nationalist,” and claimed that on April 4, 2023, “Autism Speaks would be taken over by Autistic Nationalists” and “Autism Speaks would be surrounded by Autistic people more terrible than the BLM riots and the Capitol Riots combined, and *a team of women would burn down the DC location and its leadership would be executed*” (emphasis added). As the YouTube videos were publicly posted on the defendant’s YouTube account, the videos were transmitted in interstate and foreign commerce

worldwide, to include the District of Columbia. Several employees of the Autism Speaks headquarters in Washington, DC confirmed that they viewed the defendant's posted YouTube videos.

15. In his videos, the defendant wore a trooper-style hat, sunglasses, a mask, and a winter coat to mask his identity. The actions of the defendant resulted in an increased police response at the Autism Speaks locations in both Washington, DC and New Jersey. The defendant was later observed again in the area of the Autism Speaks DC location on November 29, 2022.

16. Based on training and experience, I know that Accelerationist and Nationalist views are often associated with extremist ideology. Nationalist practices characteristically involve an individual affiliating themselves with a group that supports their best interests and are typically at the expense of an opposing group. The modern concept of Accelerationism is most notably observed in extremist communities with a core belief that an acceleration of violence and conflict will lead to an intended goal. The defendant espoused similar language in his social media commentary, calling for a "Pure Neurostate." Although both Accelerationism and Nationalism are often associated with race, identity, or politics, they can span any demographic.

Identification

17. During the course of the investigation, I worked alongside the FBI, the Howard County, Maryland Police Department, and the Howard Community College Department of Public Safety. It was determined there had been multiple incidents with the defendant in Howard County, MD, which ultimately led to the identification of the defendant as Corbin Oliver Gray.

18. On November 28, 2022, Howard County police had a similar incident with the defendant. Wearing the same outfit he wore in the Autism Speaks break-in video, the defendant entered the Linwood School in Maryland, which is a school for the Autistic Community. He was

denied further entry and ordered out, at which time he placed flyers on the cars outside of the school that were the same as the one that he placed at Autism Speaks in Washington, DC. He used the hashtag #DarkItUpRed on his flyers, which led to the identification of his YouTube account, Twitter account, and Reddit account.

19. On December 1, 2022, Howard County police interviewed the defendant regarding the incidents at the Linwood School and Autism Speaks. The defendant acknowledged that he entered the school, and that he was the one in the video that entered the Autism Speaks Headquarters located in DC. Howard County police also observed the jacket, hat, and glasses that the defendant was wearing in the video at his residence. The mother of the defendant had previously petitioned for a mental health evaluation of the defendant, and the defendant was subsequently transported by police to a mental health facility in Howard County, MD, for mental health observation and treatment. The defendant was released approximately three weeks later and posted on his social media accounts that he had been committed for treatment and had since been released.

20. On December 8, 2022, Special Agent Oliva Temrowski of the FBI and I interviewed the Senior Vice President of Advocacy at Autism Speaks, who has office space in the DC location. He advised that his fellow staff members had great concern for their safety based on the defendant's actions demonstrated in his posted break-in video. The Senior Vice President also confirmed that the defendant was not a person who would have consent to be in the location at the time he had entered. As a result of the flyers advocating for the execution of ABA practitioners and the social media posts stating that Autism Speaks would either be taken over or burned to the ground and its leadership would be executed, there was a heightened security concern over the April 4, 2023 date. Autism Speaks also provided a copy of the building key swipes, revealing that the defendant broke into the location on November 15, 2022 at 17:26 hours (i.e., 5:26 pm). This was

corroborated by the defendant's social media posts where he acknowledged that he had deceived custodial staff to gain entry into the location at a time in which it would have been prohibited.

21. Special Agent Temrowski and I also interviewed several practitioners of ABA at the Autism Speaks facility who indicated that they believed the defendant's threats were credible, and that his language was violent beyond the pale of simple rhetoric.

22. On February 28, 2023, at approximately 5:56 pm, the defendant was stopped again at the Autism Speaks location at 1990 K St NW. The defendant advised law enforcement that he was a student at Towson and had been in the building before. The defendant identified himself as Corbin Oliver Gray of 9265 Maple Rock Drive, Ellicott City, MD. He was advised he had been barred from the building and was allowed to leave. He then came back to the officers and asked them why Autism Speaks was closed.

23. On March 6, 2023, Special Agent Temrowski and I interviewed Detective Sean Kent of the Howard County Police Department. Detective Kent confirmed the identity of the defendant as Corbin Oliver Gray based on his investigation of the Linwood School incident.

24. Also on March 6, 2023, Special Agent Temrowski and I interviewed staff at the Linwood School, who recounted the incident with the defendant. It was learned that the Linwood School incident was tied to a previous incident at Howard Community College from November 2022. One of the Linwood School therapists was confronted by the defendant during a Job Fair at the College, where the defendant challenged her on ABA and the damage it can cause to the Autistic Community. She immediately recognized the defendant when he entered the Linwood School on November 29, 2022, based on his voice, gait, mannerisms, and aesthetics. The Linwood School increased their security presence because of the defendant's actions and were provided an active shooter response course by law enforcement as a result.

25. On March 16, 2023, Special Agent Temrowski and I interviewed Howard County College Department of Public Safety Investigator Bobby Eason. Investigator Eason corroborated the narrative provided by the Linwood School staff concerning the job fair incident and advised that the defendant was a student at the college. There had been at least two similar incidents surrounding the defendant and anti-ABA rhetoric at the campus, with the most recent one taking place on March 4, 2023. The College was concerned about the flyers the defendant placed on cars in the parking lot because of the verbiage used by the defendant that they believed was violent in nature. The College provided me with a photo of the defendant from the March 4, 2023 incident, and advised that his vehicle had been abandoned in lot A of the school's campus since March 8, 2023.

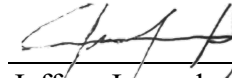
**REQUEST TO SUBMIT WARRANT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

26. I respectfully request, pursuant to Rules 4.1 and 41(d)(3) of the Federal Rules of Criminal Procedure, permission to communicate information to the Court by telephone in connection with this Application for an Arrest Warrant. I submit that Assistant U.S. Attorney John F. Korba, an attorney for the United States, is capable of identifying my voice and telephone number for the Court.

CONCLUSION

27. Based on the forgoing, I submit that there is probable cause that between on or about November 15, 2022, and on or about March 4, 2023, the defendant, **Corbin Oliver Gray**, committed the offenses of 18 U.S.C. § 844(e) (Threats in or affecting interstate commerce to kill, injure, or intimidate an individual or to damage or destroy property by means of fire) and 18 U.S.C. § 875(c) (Threats in interstate communications), and request that the Court issue the proposed arrest warrant.

Respectfully submitted,



Jeffrey Janczyk
Detective Sergeant
Metropolitan Police Department

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone on **March 31, 2023**.

ROBIN M. MERIWEATHER
UNITED STATES MAGISTRATE JUDGE