

CRIMINAL COMPLAINT
(Submitted electronically)

United States District Court	DISTRICT of ARIZONA
United States of America v. Michael Pengchung Lee DOB: 1996, United States Citizen	DOCKET NO. MAGISTRATE'S CASE NO. 23-02094MJ
Complaint for violations: Title 18, United States Code § 875(c).	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: On or about October 22, 2023, in the District of Arizona, Michael Pengchung LEE , knowingly and willfully did transmit in interstate and foreign commerce, through the use of a Snapchat iPhone application, transmitted in interstate commerce a communication of a threat to injure the person of another, to wit: to commit a mass shooting at the University of Arizona. All in violation of Title 18, United States Code, Section 875(c).	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On October 22, 2023 Michael Pengchung LEE sent multiple Snapchat messages using the name asianluluu to a group chat threatening to commit a mass shooting at the University of Arizona. During the Snapchat conversation LEE stated: - "Theres going to be a mass tragedy and atrocity at the UofA Soon". -When asked what tragedy, LEE stated "a Mass shooting". When asked if he meant "at the UofA?" He said "sure is". When asked how he was planning on committing this mass shooting, LEE stated, "with an AR-15" and he stated "it's Arizona you can just buy one". A group chat member asked when LEE would purchase the gun LEE said "I'm not sure, probably right before, so my mom doesn't find it". When asked what day he would conduct the shooting he replied "damn I haven't decided yet". - LEE went on to say, "The day of Retribution is upon us, I shall get revenge on all the chads and stacies!!" (suspected by agents to mean Fraternity and Sorority members). When he saw the females in the group chat screenshotting his posts he stated "fuck you stacies I was gonna give u a warning but now im not". LEE went on to state, "my alleged crimes? Im gonna commit a much worse crime.... Youll hear about it on the news". LEE further stated, "It's a solo mission, I'm not normal, I never have been, I'm severely autistic and mentally ill and was never accepted by society, I have no place in the world". - LEE then told the group as a final message: "also the 10th anniversary of the day of retribution is may 23, 2024 btw, but isn't the UofA gonna be out of session by then?" Agents know that "the day of retribution" refers to the mass shooter Elliott Rogers, who killed sorority and fraternity members in 2014 and was a self-identified involuntary celibate (incel). On Michael Lee's Instagram page, he identifies as a former incel. LEE 's reference to "chads" and "stacies" in earlier Snapchat messages are commonly used terms by incels. - LEE finished his conversation on Snapchat by saying: "im gonna do it guys, my mind is made up and there's nothing u can do or say to stop me." <i>Continued on next page...</i>	
MATERIAL WITNESS(ES) IN RELATION TO THE CHARGE: N/A	
DETENTION REQUESTED <i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i> AUTHORIZED by AUSA A. Rossi	SIGNATURE OF COMPLAINANT OFFICIAL TITLE & NAME: Austin Spalla, Task Force Officer, Federal Bureau of Investigations
Sworn to telephonically.	
SIGNATURE OF MAGISTRATE JUDGE¹⁾ 	DATE October 24, 2023

¹⁾ See Federal Rules of Criminal Procedure Rules 3, 4.1 and 54

Agents utilized the University of Arizona Police FLOCK License Plate Reader, and learned that **LEE**'s vehicle was seen in the area of University Greek row on October 11, 12, 13, 14, 17, 18, 19, 20, and 21, 2023, from 9:00 pm to 1:00 am on various nights.

On October 23, 2023, a traffic stop for speeding was conducted on **LEE**. Post-*Miranda*, **LEE** admitted to being the author of the snapchat threats. **LEE** stated he was frustrated with his homelife and decided to "vent" to the group chat with his friends. He stated he was a former member of the incel community but was no longer. He attempted to purchase a firearm two months ago but decided against it. **LEE** admitted he was aware the threats to commit a mass shooting were wrong and concerning.

The threats were utilized using the Snapchat app, which utilizes servers outside of the State of Arizona. Agents also learned that in September of this year, **LEE** was arrested for possessing controlled substances and a firearm in a storage facility rented by him. The controlled substance charges are pending.