

**AFFIDAVIT**

I, Michael Alexander Smith, being duly sworn, state under oath that:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since October 2023. I am currently assigned to the Kansas City Division, Kansas City, Missouri, on the Counterintelligence squad. In the course of my duties, I have worked closely with Air Force Office of Special Investigations ("OSI") on national security matters pertaining to Whiteman Air Force Base ("WAFB"). I am familiar with tradecraft and techniques employed by foreign adversarial nations, as well as the methods those nations use to collect intelligence on elements of U.S. military infrastructure. I received my initial Special Agent training at the Counterintelligence Special Agents Course at Fort Huachuca, Arizona in 2018. I served as a Counterintelligence Special Agent with the United States Army from 2018 – 2023. I graduated as a FBI Special Agent from the FBI Academy, Quantico, Virginia in March 2024. In connection with my official duties, I have conducted both criminal and national security investigations. Based upon my training, experience, and investigation in this matter, I believe the following facts to be true and correct:
2. This Affidavit contains information necessary to support probable cause for this complaint. It is not intended to include every fact or matter observed by me or known by law enforcement. The information provided is from my participation in this investigation as well as from reviewing investigative reports, physical evidence obtained during the investigation, my review of records and documents, from discussions with others, including law enforcement officers, and from my personal knowledge, training, and experience.
3. Title 18, United States Code, Section 795, is part of the Espionage Act. More specifically, 18 U.S.C. § 795 (i) authorizes the President of the United States to define certain vital military and naval installations or equipment as requiring protection against the general dissemination of information relative thereto; and (ii) prohibits, in the interest of national defense, the making of any photograph, sketch, picture, drawing, map or graphical representation of such vital military or naval installations or equipment without first obtaining requisite permissions (*e.g.*, from the commanding officer of the military or naval post).
4. In Executive Order 10104, then-President Harry Truman, in the interests of the national defense, identified vital military and naval installations and equipment requiring the protection afforded by 18 U.S.C. § 795. *See* Executive Order 10104. The Executive Order specifies that "[a]ny military, naval, or air-force reservation, post, arsenal, proving ground, range, mine field, camp, base, airfield, fort, yard, station, district, or area" classified as "top secret, secret, confidential, or restricted" falls under the protection afforded by 18 U.S.C. § 795. *See* Executive Order 10104.

5. On December 2, 2025, at approximately 1645 hours local (CST), Special Agent Donald Pearce, an Air Force Office of Special Investigations ("AFOSI") Special Agent ("SA") assigned to Detachment 811, WAFB, Missouri, received notification of a suspicious vehicle parked outside the southeast perimeter fence of WAFB. WAFB is located within the Western District of Missouri. The suspicious vehicle was described as a Toyota Sienna van bearing Massachusetts license plate number 3RGG16. Security Forces Patrolman Jacob McCleerey, went to the location and made contact with the sole occupant of the van, later identified as **Qilin WU** (male, DOB: 03/01/1989; address: 42 Higgins Street, Unit 1, Allston, Massachusetts).<sup>1</sup> **WU** presented a Massachusetts driver's license bearing license number SA3101857. During the encounter, **WU** spoke limited English and relied on a translation application on his phone, which the patrolman observed contained what appeared to the patrolman to be Mandarin characters. **WU** stated that he had driven from Boston, Massachusetts, specifically to observe the B-2 Spirit aircraft. **WU** inquired when the B-2 would be flying. The patrolman advised **WU** that **WU** was permitted to remain at his current location to watch aircraft activity, but **WU** was not authorized to take photographs or video recordings of the installation. **WU** acknowledged this instruction by responding: "Okay." When asked directly if he had taken any photographs, **WU** replied that he had not, explaining that **WU** had not yet seen the B-2 aircraft. Following the encounter, the patrolman notified Johnson County Dispatch to document the suspicious vehicle. By the time a deputy arrived on scene, **WU** had departed the area.
6. The next day, on December 3, 2025, at approximately 12:00 p.m., AFOSI SA Kerry McGuire responded to a report of a suspicious vehicle positioned outside the southeast perimeter fence of WAFB. Upon arrival, SA McGuire made contact with the driver of the vehicle, who identified himself as **Qilin WU**. **WU** presented a valid Massachusetts driver's license for identification. The suspicious vehicle was the same Toyota Sienna van bearing Massachusetts license plate number 3RGG16 that the Security Forces Patrolman had observed on December 2, 2025. During this new encounter on December 3, 2025, SA McGuire noted that **WU**'s English proficiency appeared to be limited. **WU** again relied primarily on a translation application installed on his cellular phone, which appeared to display Mandarin characters, to facilitate communication with the agent. **WU** provided additional background information regarding his entry into the United States and his personal history. **WU** stated that he entered the United States in or around 2022 by crossing the Mexican border into Arizona on foot. He explained that prior to this crossing, he had flown from China to Ecuador and then traveled north through Mexico. **WU** disclosed that he was detained at some point by U.S. Customs and Border Protection, but **WU** reported that he was subsequently released after he claimed asylum. **WU** further stated that he had previously served in the

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<sup>1</sup> During the consensual contact with the Security Forces Patrolman Jacob McCleerey, **WU** provided a copy of his Massachusetts driver's license that referenced this personally identifiable information.

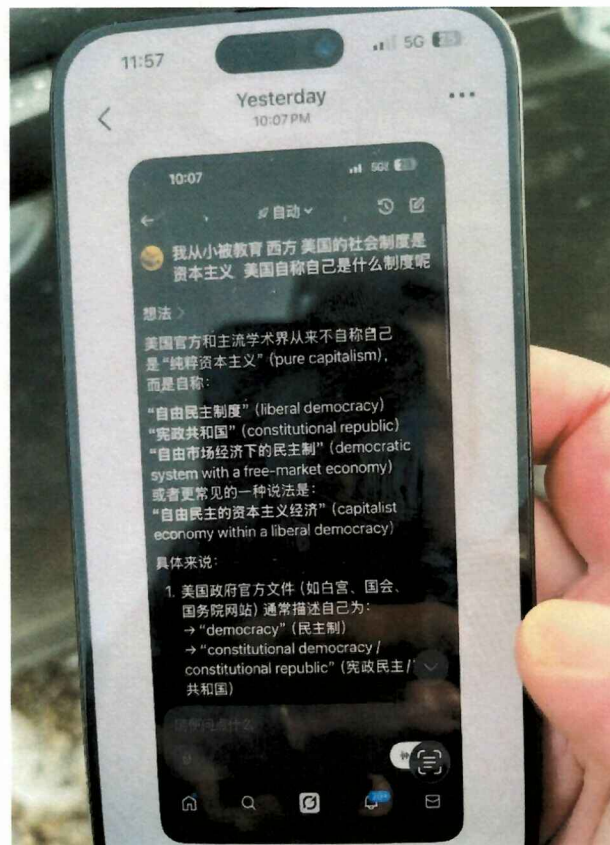
Chinese military. While serving in the Chinese military, WU stated that he witnessed troubling events that led him to conclude conditions in China were “no longer good.” He elaborated that he had worked as a firefighter and he also served two years in the Central Military Band of the People’s Liberation Army of China, specifically as a saxophone player in the Soldiers of Jun Band. When asked to present immigration documentation, WU initially refused to do so unless the SAs were equipped with body-worn cameras, explaining that such a process felt “more formal.” Shortly thereafter, a Johnson County, Missouri Sheriff’s Deputy arrived on scene, at which point WU presented his Chinese passport bearing passport number EA9787632. WU consented to the SAs photographing both his Massachusetts driver’s license and his Chinese passport for evidentiary purposes.

7. On December 3, 2025, during the course of the consensual, non-custodial interview, the Johnson County Sheriff’s Deputy who arrived on scene had a body camera that recorded the interaction once he was present. A copy of that video footage has been secured by OSI. WU disclosed that he had taken photographs and videos of the installation. WU specifically admitted that he recorded video footage of a B-2 Spirit aircraft taking off late on December 2, 2025. When asked by SA McGuire if the images and videos could be reviewed, WU agreed and consented to SA McGuire using a cellular phone camera to capture screenshots directly from WU’s cellular phone. SA McGuire took a total of eighteen photographs of WU’s camera that was displaying photographs that WU admitted he had taken using his camera on WU’s cellular phone. SA McGuire preserved the photographs as evidence. The photographs WU showed SA McGuire contained imagery of sensitive areas of WAFB, including the perimeter security fence line adjacent to the Weapons Storage Area (“WSA”) fence line, static aircraft displays located at the Arnold Entry Control Point, and a security barrier at the Arnold Entry Control Point that obscures the B-2 hangars on the flightline. Additionally, WU showed SAs a nighttime video that depicted a B-2 aircraft taking off from WAFB, with audible afterburner activity. WU stated on December 2, 2025, he traveled from Boston to New York and then to Missouri with the specific intent of observing a B-2 Spirit aircraft at WAFB. WU described himself as an aviation enthusiast. WU claimed that the B-2 was his favorite aircraft, followed closely by the F-35. He further disclosed that he had previously visited Langley Air Force Base in Virginia, where he admitted that he photographed multiple military aircraft, including an A-10, a B-2, and a B-52.
8. On December 5, 2025, AFOSI SA Pearce and SA McGuire reviewed the images and videos taken by SA McGuire during the consensual encounter with WU. These images and videos were documented as evidence. The review confirmed eighteen screenshots had been captured with WU’s consent. Below is a description of each recorded image:
  - **Image\_175551688** - Date Stamp: 30 Nov 25 at 8:10PM; Description: screenshot of highway systems near Houston Texas, specifically Space Center Houston and League City.

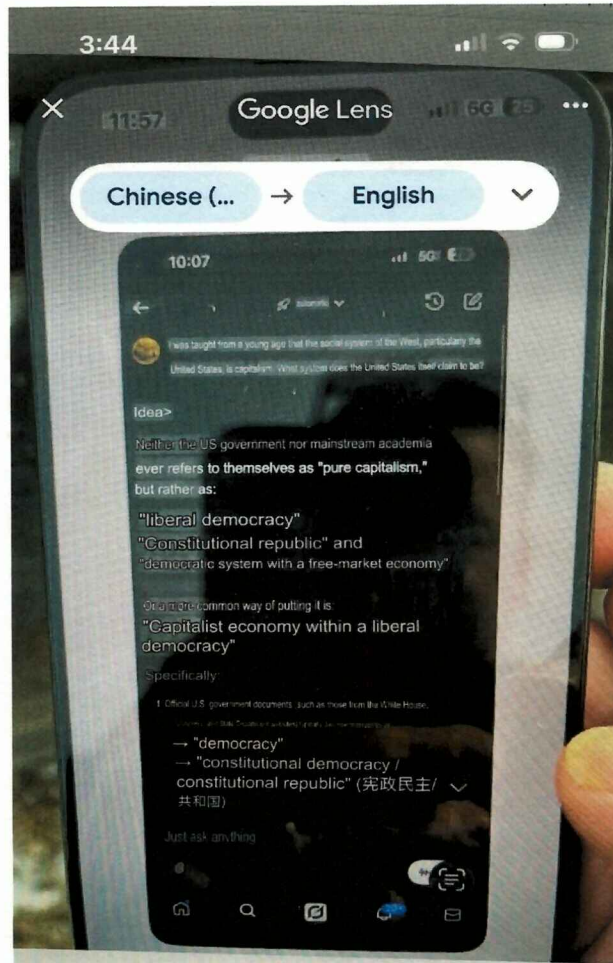
- **Image\_175552609** - Date Stamp: 30 Nov 25 at 8:12PM; Description: Screenshot of highway systems near San Antonio and Houston. Specifically, a marker for Reynosa, Mexico. Screenshot also has a WeChat message captured: translation from Mandarin to English, First Line: Wang Zhou's Mom (or Wang Zhuo's Mother) Second Line: [voice message] 11 seconds (Agent Note: Reynosa is a border city in Mexico where thousands of foreign nationals attempt to enter the U.S. each year).
- **Image\_175627393** - Date Stamp: unknown (SA Note: WU stated this photograph was taken on 2 December 2025); Description: east side of WAFB, depicts perimeter of base near the Weapons Storage Area (WAS).
- **Video\_175655000** - Date Stamp: 2 Dec 25 at 2:23PM; Description: Video appearing to be from a vehicle making a left hand turn on highway Y heading south. Video depicts perimeter fence line near the WSA.
- **Image\_175711738** - Date Stamp: unknown (SA Note: WU stated photograph was taken on 2 December 2025); Description: image depicts roadway leading up to Arnold Gate on the north side of WAFB. Static B-52 is seen in the background.
- **Image\_175715595** - Date Stamp: unknown, (SA Note: WU stated photograph was taken on 2 December 2025); Description: image depicts sidewalk leading up to the B-52 static display at Arnold Gate. WAFB water tower is seen in the background.
- **Image\_175717352** - Date Stamp: unknown, (SA Note: WU stated photograph was taken on December 2, 2025); Description: image depicts the Arnold Gate sign for WAFB which is near a gate that allows restricted access onto the installation.
- **Image\_175719757** - Date Stamp; unknown, (SA Note: WU stated this photograph was taken on December 2, 2025); Description: image depicts security fence as well as the security barrier that obscures the view of the B-2 hangars in the background.
- **Image\_175722892** - Date Stamp; unknown, (SA Note: WU stated photograph was taken on 2 December 2025); Description: image depicts the security perimeter fence on the south end of the runway. The instrument landing system ("ILS") is seen in the background.
- **Image\_175728132** - Date Stamp; unknown, (SA Note: WU stated photograph was taken on 2 December 2025); Description: image appears to be from a vehicle traveling westbound on SE 23 Highway near LeMay Commercial Vehicle Gate. WAFB housing is seen on the right side along with perimeter security fence line and base lighting.



- **Image\_175734105** - Date Stamp; unknown, (SA Note: WU stated photograph was taken on 2 December 2025); Description: blurry image of sunset. It appears to be south of base near LeMay Commercial Vehicle Gate.
- **Image\_175738171** - Date Stamp; unknown, (SA Note: WU stated photograph was taken on December 2, 2025); Description: image is dark and blurry; however, B-2 navigation and anti-collision lights are seen in the photograph.
- **Image\_175745999** - Date Stamp; presumed 2 Dec 25 at 9:16PM (SA Note: WU stated photograph was taken on 2 December 2025); Description: a screen shot of WAFB from a GPS satellite view. A blue dot appears to indicate WU's location at the time the screen shot was captured. (Affiant's Note: This information coincides with WU's location when the Security Forces patrolman and Special Agents interacted with him on December 2 and 3, 2025.)
- **Image\_175751278** - Date Stamp; 2 Dec 25 at 10:07PM (SA Note: WU stated photograph was taken on 2 December 2025); Description: Screenshot containing Mandarin text dated "Yesterday" at 10:07 pm. Below is a copy of that screenshot:



SA McGuire used Google Translate for a machine translation of this image and captured the following screenshot depicting the English translation:



- **Image\_175801149** - Date Stamp; unknown (SA Note: **WU** stated this photograph was taken on December 2, 2025); Description: SA McGuire attempted to capture a video but inadvertently captured a photograph of the video. The video was successfully captured as Video\_175804000.
- **Video\_175804000** - Date Stamp; unknown (SA Note: **WU** stated this video was taken on December 2, 2025); Description: the video is dark and blurry; however, B-2 navigation and anti-collision lights are seen in the video and the afterburner of the dual engine aircraft is heard while a B-2 is taking flight over WAFB.
- **Video\_175824000** - Date Stamp; unknown (SA Note: **WU** stated video was taken on 2 December 2025); Description: this video is dark and blurry; however, B-2 navigation and anti-collision lights are seen in the video in the upper righthand corner and the afterburner of the dual engine aircraft is heard while a B-2 is taking flight over WAFB.

- **Video\_175919000** - Date Stamp; unknown (SA Note: **WU** stated video was taken on December 2, 2025); Description: video depicts a hand pressing a button on the upper console of a van. The video then depicts the south end of the runway perimeter security fence line and then pans to the east showing the roadway.
9. The United States' critical infrastructure provides the essential services that underpin American society. It is comprised of physical and virtual assets and systems so vital to the United States that their incapacity or destruction would have a debilitating impact on national security, national economic security, or national public health or safety. The Department of Defense ("DoD") has further established critical infrastructure that is identified as networked assets and facilities essential to the projection, support and sustainment of military forces and operations worldwide. Defense Critical Infrastructure ("DCI") consists of infrastructure owned and controlled by the DoD that is critical to the execution of one or more operational plans; and infrastructure on which the DoD depends on for operations but does not own or control, e.g., power, water, communications.
  10. WAFB hosts critical DoD infrastructure that is essential to the Department of the Air Force's nuclear deterrence capabilities and a variety of other DoD missions. WAFB plays a central role in national security by housing the B-2 Spirit stealth bomber fleet, enabling precision global strike, strategic deterrence, and nuclear readiness. Its assets provide advanced stealth, radar-evading technology, and secure command and control systems that ensure the credibility of the United States' nuclear triad. Consequently, the incapacitation or destruction of WAFB would have a debilitating impact on the nation's nuclear deterrence posture and one or more critical DoD missions.
  11. Based on DoD Manual 5200.08, Volume 3, which governs physical security and access control for all DoD installations, I know that this manual specifically applies to Air Force Bases with strategic assets. Additionally, Facilities Criteria (FC 4-420-07F, 2018) confirms that bases supporting nuclear missions, such as Whiteman Air Force Base ("WAFB") with the B-2 Spirit Stealth Bomber, must be treated as restricted areas with enhanced security. Therefore, WAFB qualifies as a vital military installation as set forth in 18 U.S.C. § 795 and defined in Executive Order 10104. The aforementioned images and videos that depict WAFB are depicting vital military installations and equipment.
  12. On December 3, 2025, **WU** provided AFOSI SAs consent to search **WU's** vehicle. SAs conducted a plain view search of **WU's** vehicle with **WU's** consent. SA McGuire conducted a preliminary search of the vehicle and discovered bedding material, food, drinks, and an iPad. SA McGuire did not discover any contraband. **WU** permitted agents to look at the iPad; however, when SAs looked at the device they did not discover any photographs or messages. **WU** maintained control over the device, limiting the scope of the consensual search of the device. During the encounter, **WU** explained that once he had seen a B-2 Spirit aircraft, he intended to travel to Florida to observe an F-35 aircraft and then continue on to "Houston Star



Base.” SA McGuire asked WU if he would accompany the agents to the Visitor Control Center to complete paperwork. WU agreed. While enroute to the visitor center, WU asked whether it would be possible to see or touch a B-2 aircraft. At the visitor center, the SA requested that WU enroll his biometrics in the Javelin system. The Javelin is a mobile biometric collection platform capable of collecting multi-modal biometrics. WU declined, stating that the process was “not worth the hassle.” WU then became visibly discontent with the line of questioning. WU expressed that he no longer liked Americans, and WU indicated that he intended to return to China.

13. On December 3, 2025, AFOSI contacted Immigration and Customs Enforcement (“ICE”) Enforcement and Removal Operations (“ERO”) in Kansas City, Missouri regarding the immigration status of WU. Deportation Officer Kirk Ellis (DO Ellis) reviewed immigration indices on WU. WU was identified as an alien from China. According to ICE, WU entered the United States on or about June 22, 2023, near Nogales, Arizona. At that time, U.S. Border Patrol determined that WU had entered the United States from Mexico without inspection. WU was determined to be an illegal alien from China and accordingly was arrested under the Immigration and Nationality Act. Due to a lack of detention space, WU was released on his own recognizance while he awaited removal proceedings. On December 3, 2025, WU’s next immigration court date was scheduled for February 9, 2027. On December 3, 2025, after WU was taken to the WAFB Visitor Control Center, AFOSI officials placed WU under custody to further investigate the offense of 18 U.S. Code § 795, that is for photographing and sketching defense installations. WU is still under investigation for this offense. As a result of this encounter, ICE ERO Kansas City arrested WU for a custody re-determination hearing. WU will have a hearing before an immigration judge to decide if he should remain in ICE ERO custody or be released for the remainder of his immigration proceedings. At the time of the execution of this Affidavit, it is my understanding that ERO has transferred WU’s immigration proceedings from Massachusetts to Kansas City.
14. On December 5, 2025, OSI SA Jessica Gross verified the official flight schedule for WAFB. The schedule confirmed that two B-2 Spirit aircraft departed WAFB on December 2, 2025, at approximately 1730 and 1731 local hours. The B-2 Spirit is a strategic bomber equipped with classified and sensitive systems throughout its design and operation.
15. On December 4, 2025, FBI SA James Churchill and I interviewed WU. Prior to serving as a federal agent, SA Churchill was a Mandarin linguist for the FBI. WU was advised of his *Miranda* rights verbally and in writing in English and Mandarin. The interview was both video and audio recorded. WU indicated he understood his rights and was willing to answer questions. WU stated that, in or around 2023, he traveled from China to Ecuador. From Ecuador, WU traveled by bus through Mexico to the United States. WU then walked across the border in the area of Nogales, Arizona. WU admitted to taking photographs of WAFB using his cellular telephone. Specifically, WU stated he took photographs of planes in the



sky, some of the railing and fencing of the base perimeter, and the B-52 outside of base. WU stated he was unaware he was not allowed to take photographs. WU stated he did not see anything that clearly stated he could not take photographs. WU took a total of ten photographs and videos. Four of them were taken at night and the others were taken during daytime hours. (Affiant Note: On December 2, 2025, Security Forces Patrolman McCleerey informed WU that he was prohibited from taking photographs or videos of WAFB. Based on the time stamps observed on some of the photographs, I know that WU took at least some photographs of WAFB after WU was told he was not permitted to do so.

16. OSI SA Jessica Gross conducted a criminal background check on WU and discovered that WU has had other interactions with law enforcement officials. On May 7, 2024, officers of the Key West Police Department encountered an individual identified as WU at 55 Quay Road, Key West, Florida. WU was observed camping in his van and his van was documented as a suspicious vehicle by responding officers. On May 14, 2024, at approximately 0319 local hours, WU was encountered by Key West Police Department officers at 3681 South Roosevelt Boulevard, Key West, Florida. During this encounter, officers conducted a field interview and issued WU a written warning for lodging and camping in his vehicle. The location of this incident is situated directly within the pathway used by Naval aircraft for takeoff and landing operations, thereby raising heightened safety and security concerns.
17. The aforementioned events involving WU photographing at WAFB all occurred within the City of Knob Noster, County of Johnson, State of Missouri, which is within the Western District of Missouri. These events give rise to probable cause that this subject is in violation of various federal laws, including, but not limited to, Title 18, United States Code, Section 795 (Photographing a Defense Installation).

FURTHER, YOUR AFFIANT SAYETH NAUGHT.



Michael Alexander Smith  
Special Agent  
Federal Bureau of Investigations

Telephonically/remotely or otherwise subscribed to and sworn to before me this 6th day of January 2026.



HONORABLE JILL A. MORRIS  
United States Magistrate Judge  
Western District of Missouri

