FILED
DATE: November 18, 2026
TIME: 4:17:15 PM
FORSYTH COUNTY
CLERK OF SUPERIOR COURT
BY: F. Andrade Jr.

STATE OF NORTH CAROLINA COUNTY OF FORSYTH	IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 26CR021882-330, 26CR392829-330
STATE OF NORTH CAROLINA V. SARAH LINDSAY SANTIAGO Defendant	STATE'S BILL OF PARTICULARS PURSUANT TO N.C.G.S. § 15A-925

NOW COMES the State of North Carolina, by and through the undersigned Assistant District Attorney, pursuant to N.C. Gen. Stat. § 15A-925, and hereby files this Bill of Particulars in compliance with the September 23, 2026 Order of the Honorable Richard S. Gottlieb, Senior Resident Superior Court Judge. The State offers the following responses to the specific requests made in Defendant's Motion for a Bill of Particulars:

I. **Preliminary Statement**

Defendant, a minor, was indicted on August 31, 2026 for one count of Conspiracy to Commit First-Degree Murder (26CR392829-330) and three counts of First-Degree Murder (26CR021882-330, 26CR021883-330, 26CR021884-330), all arising from the shooting at the Islamic Center of San Diego on May 18, 2026. The State provides the following information based upon the facts developed during the State's review of the materials provided in discovery.

II. **Particulars as to 26CR392829-330 — Conspiracy to Commit First-Degree Murder**

A. Specific Dates of the Conspiracy

The conspiracy among Sarah Lindsay Santiago (*hereinafter,* "Santiago"), Cain Clark (*hereinafter,* "Clark"), and Caleb Vazquez (*hereinafter,* "Vasquez") developed over a period of several months culminating on May 18, 2026. The specific dates and communications establishing the conspiracy include the following:

1. On or about January 18, 2026: Santiago and Vazquez communicated via Discord, during which Vazquez expressed violent animus toward religious and racial minorities, stating, "All kikes, muzzies and niggers will face the rope." Santiago, during the same communication, discussed an individual who had stated that he was going to conduct a violent attack and expressed regret that the individual had not carried out the attack.
2. On or about February 8, 2026: Santiago and Vazquez communicated via Discord and discussed their admiration for prior mass shooters, including perpetrators of attacks at a mosque in Christchurch, New Zealand; Sandy Hook Elementary School; Antioch High School; and Virginia Tech University.
3. On or about February 16, 2026: Santiago communicated with Vasquez via Discord and stated, "I call for the execution of all Jewish people, Spanish people, and Muslim/Arab men".
4. On or about April 12, 2026: Santiago purchased a Sonnenrad patch from Patch Zone World and shipped it to Vazquez at his Chula Vista, California residence.
5. On or about April 13, 2026: Santiago communicated with Clark via TikTok, during which they discussed mass shooters and copycat attacks, including Colt Gray, Payton Gendron, Timofey Kulyamov, and Natalie Rupnow. On the same date, Santiago was involved in a Signal chat with Vazquez, during which Vazquez sent Santiago a screenshot of an Amazon purchase of a tactical helmet and camera mount, to be delivered to Santiago's home address on April 17, 2026.
6. On or about May 17, 2026: Santiago was involved in multiple Signal communications with Vazquez. Vazquez advised Santiago that he was going to be investigated and possibly arrested by federal law enforcement, that he had "a book/document" that would get them arrested, and that he was contemplating committing suicide. Vazquez stated to Santiago, "Um, please don't tell anyone when you get this message. Don't say anything to anyone, please, I'm trusting you." Santiago told Vazquez to "watch what he said" because he would likely be recorded and instructed him to "always plead the fifth."
7. On or about May 18th, 2026: Santiago was involved in a TikTok Chat with Vazquez, who was utilizing Clark's TikTok account to speak with Santiago. Vazquez stated, "we have to do it today." Santiago asked what they have to do before stating, "if you want I can support you guys if you guys come over here." Vasquez responded that law enforcement would catch him "no matter what." Santiago responded, "and I'll do my best to pay for your bond and bail." Vazquez

responded, "I'll get 15-30 minimum for conspiracy." Santiago responded, "if you do this you know the same thing that happened with you is going to happen to me." She later added, "plus I don't want to imagine all the fangirls you might have." Vazquez stated "well now you know what I'm going to do," added, "it was meant to happen months ago or around this time while fully prepared," and told Santiago to hide her phone. Vasquez stated "I'll send you all the stuff" and asked Santiago to "make a backup," which she stated she did. Santiago asked, "when are you going to do it," and added "I need to know so I can prepare myself." Vasquez responded, "A couple hours . . . muzzies, kikes, then niggers if we have time". In the same chat, Santiago stated to Vasquez, "[I]magine how the feds are going to treat me".

8. On or about May 18th, 2026: Later that same morning, Santiago was involved in Discord chat with user "jimbocest#0" (the evidence shows this to be the individual known as "Otto"). Santiago asked for advice about getting "fedded," explaining that Vasquez and Clark were "gonna do something" that would result in her being investigated by federal law enforcement. Shortly thereafter, Santiago was involved in another Tik-Tok chat with a user named "Took2Much999" in which she stated, "my bf is going to do something and ik the feds are gonna go thru my phone." She then elaborated that "my bf is going to do an attack so IK I'm going to get fedded for more info," later adding, "[m]y bf is gonna do something like fr and because of that I'm going to get fedded."

9. On or about May 18th, 2026: After Santiago's Discord chat with "Otto" and Tik-Tok chat with "Took2Much999," Vasquez informed Santiago in a Tik-Tok chat, "[w]e are gearing up." Just over five minutes later, Santiago sent a message to "Otto" over Discord that stated, "theyre gearing up." When "Otto" asked for clarification, Santiago sent the following message: "THEYRE GEARINF UP…for…you know."

10. On or about May 18th, 2026: Beginning at approximately 10:21 AM PDT, Santiago and Vazquez communicated further via Signal, with Vazquez sending Santiago a video message stating, "We're getting ready, we're about to start up the stream. It's about to happen." Vazquez then transmitted to Santiago via Signal the manifesto, titled "The New Crusade." Vazquez asked Santiago to "archive" diary logs he transmitted via two Google Documents links titled "Diary Logs Surface" and "Caleb Diary Logs." Santiago agreed, responding, "Of course." Santiago then advised Vasquez to "delete (his) e sim" (*to prevent cellular tracking, cover digital tracks, or evade law enforcement*). Vazquez thereafter asked Santiago to screen-record his livestream

of the attack. Santiago agreed, responding "okii" to confirm that she was screen-recording as requested. Other messages show that Santiago recording the attack was believed to be the only method for Vasquez and Clark to distribute their attack livestream on the internet.

11. On or about May 18th, 2026: At approximately 11:17 AM PDT, Santiago screen-recorded another Signal video call with Vasquez. Vasquez was in the vehicle with Clark and appeared to be attempting to mount his phone to his tactical helmet. Santiago then screen-recorded another Signal video call with Vasquez, who was with Clark in what appeared to be a parking structure. In the video, Clark and Vasquez were wearing the gear worn during the attack and displaying their firearms. This video appears to be the start for the livestream of the attack. During the video that was recorded of the shooting, Clark and Vasquez appear to pull over onto the side of the road while Santiago works to reconnect the video call. When the video resumes, Clark and Vasquez continue down the road toward the mosque where the shooting occurs moments later.

12. On or about May 18th, 2026: Santiago shares the livestream of the attack and "The New Crusade" manifesto with "Otto."

13. On or about May 18th, 2026: After the shooting at the mosque and the self-inflicted deaths of Vasquez and Clark, Santiago asks "Otto" if she should call law enforcement, to which "Otto" replies in the affirmative. As she continues to message "Otto" about whether to call authorities, Santiago states, "what if I don't get fedded…and I call for no reason."

14. On or about May 18th, 2026: Around 12:02 PM PDT, Santiago calls the San Diego Police Department non-emergency telephone line two times, with each call lasting approximately four seconds. Minutes later, she informs "Took2Much999" over Tik-Tok that she knows Vasquez is dead because "HE LIVE STREAMED IT TO ME."

15. On or about May 18th, 2026: About an hour and a half after informing "Took2Much999" that Vasquez livestreamed the attack and his subsequent suicide to her, Santiago calls Forsyth County Emergency Services via a 911 call.

B. Specific Dates of the Conspiracy with Cain Clark

Santiago's direct conspiratorial communications with Clark occurred on the following dates:

1. On or about April 13, 2026: Santiago communicated with Clark directly via TikTok, during which they discussed mass shooters and copycat attacks, as described above.
2. On May 18, 2026: Vazquez communicated with Santiago using Clark's TikTok account. During these communications, Vazquez stated, "Were doing this today," and "Muzzles, kikes, then niggers if we have time," which signified the planned order of attack — the Islamic Center of San Diego, the Kehilat Ariel Messianic Synagogue, and Madison High School. Santiago responded, "Im sorry" and acknowledged that law enforcement was going to "take everything from her." Santiago was present via livestream throughout the attack, during which Clark can be heard in the background during the call.

C. Specific Dates of the Conspiracy with Caleb Vazquez

The conspiracy between Santiago and Vazquez spanned from approximately January 18, 2026, through May 18, 2026, as set forth in Section II.A above.

D. Method of Communication Between the Defendant, Cain Clark, and Caleb Vazquez

1. Santiago and Vazquez communicated primarily via TikTok, Discord, and Signal, as well as direct text messages to each other's personal cell phones.
2. Santiago and Clark communicated via TikTok.
3. On May 18, 2026, Vazquez used Clark's TikTok account to communicate with Santiago.
4. The livestream of the attack was transmitted to Santiago through a Signal video call from Vazquez's device, which was mounted on Vazquez's ballistic helmet.
5. Santiago simultaneously transmitted the livestream to a third party ("Otto") via a Discord video call using a secondary Android phone while her iPhone displayed the Signal

livestream from Vazquez. "Otto" uploaded the video to the internet as Santiago stated Vasquez and Clark desired.

E. Details of the Communications Constituting the Conspiracy

The State has set forth the material conspiratorial communications in Sections II.A through II.D above. In summary, the communications establishing the conspiracy include:

1. Santiago and Vazquez's extensive discussions regarding mass shooters, racial and religious animus, and ideological alignment with racially motivated violent extremism, from January through May 2026.
2. Santiago's purchase and shipment of a Sonnenrad patch to Vazquez on or about April 12, 2026, a symbol associated with violent white supremacy and previously worn by mass shooters during attacks.
3. Santiago's receipt of a tactical helmet and camera mount purchased by Vazquez and delivered to her address on April 17, 2026, which was of the same type worn by Vazquez and Clark during the attack.
4. Santiago's awareness on May 17, 2026, that Vazquez possessed a manifesto that would result in his arrest if discovered by law enforcement, and her advice to him to delete digital evidence and plead the fifth.
5. Santiago's receipt and acknowledgment of the manifesto "The New Crusade" on May 18, 2026, at approximately 10:25 a.m. PDT, and her agreement to archive Vazquez's diary logs.
6. Santiago's agreement, beginning at approximately 10:28 a.m. PDT, to screen record Vazquez's livestream of the attack, which she did from approximately 11:17 a.m. PDT through the conclusion of the attack. According to messages, Vasquez told Santiago that this was the only method for him to publicly disseminate the video of the attack.
7. Santiago's deletion of Discord messages discussing the manifesto, editing of a message with "Otto" to change her response from "Yes" to "I don't know" when asked if she had the manifesto, and closing of other chats on Discord.
8. Santiago's communication with TikTok user "Took2Much999" at approximately 4:07 p.m. PST on May 18, 2026, in which she stated, "OBVIOUSLY NO" in response to a question about

whether she disclosed information about the video call to law enforcement and expressed that Vazquez and Clark "wanted me to post" the video.

F. Addresses of the Planned Attack Locations

1. Islamic Center of San Diego (ICSD) — Mosque: 7050 Eckstrom Ave, San Diego, California. The ICSD is a Muslim Mosque and parochial school and is one of the largest mosques in San Diego County.
2. Kehilat Ariel Messianic Synagogue — Jewish Temple: Based partly on Vazquez's statement on May 18, 2026 (*i.e.,* "Muzzles, kikes, then niggers if we have time"), investigators determined this signified the second planned target was the Kehilat Ariel Messianic Synagogue. The specific street address of the Kehilat Ariel Messianic Synagogue is 5185 Acuna St, San Diego, CA 92117.
3. Public High School — African American Students: Based partly on the same statement by Vazquez, investigators determined the third planned target was Madison High School, which has a large Black student population. The specific street address of Madison High School is 4833 Doliva Dr, San Diego, CA 92117

III. **Particulars as to 26CR021882-330, 26CR021883-330, and 26CR021884-330 — First-Degree Murder (Three Counts)**

A. Dates, Times, and Method of Communication of the Agreement to Livestream, Disseminate, and Release the Manifesto

1. Agreement to livestream the attack: In addition to the information in sections I and II of this Bill of Particulars, on May 17, 2026, Vazquez informed Santiago via Signal voice message that he would be sending her "links and files," asking her not to tell anyone. On May 18, 2026, at approximately 10:21 AM PDT, Vazquez sent Santiago a video message via Signal confirming they were "getting ready" and about to start up the stream. At approximately 10:28 AM PDT, Vazquez asked Santiago to screen-record his livestream via Signal. Santiago agreed and confirmed she was screen-recording.

2. Method of communication: All communications regarding the live stream, manifesto, and diary logs were made via Signal (text and video), TikTok (including via Clark's TikTok account), and Discord.

3. Contents of the communication: As stated in Section II.E above, Vazquez transmitted the manifesto titled "The New Crusade" to Santiago via Signal at approximately 10:21 AM PDT on May 18, 2026. Vazquez transmitted two Google Documents links ("Diary Logs Surface" and "Caleb Diary Logs") to Santiago via Signal at approximately 10:28 AM PDT on May 18, 2026, and asked her to "archive" them. Santiago agreed.

B. Means Used by the Defendant to Disseminate the Recording and Release the Manifesto

1. Dissemination of the livestream recording: Around 11:12 AM PDT on May 18, 2026, Vasquez requests that Santiago screen-record the livestream of the attack because he is unable to livestream it via social media. In this message string, Vasquez states that Santiago recording the attack is the only way to disseminate the video of attack on the internet. Santiago used her Android phone to video call "Otto" via Discord while simultaneously viewing the livestream of the attack on her iPhone via Signal. Santiago shared the entire video with "Otto" via this Discord call. Around 11:30 that same morning, the connection is apparently severed, and "Otto" sends Santiago the message, "BRO SHOW THE FUCKING STREAM." Evidence shows that Santiago initiates another Signal video call with Vasquez, who is with Clark in a vehicle in what appears to be a covered parking structure. Both Vasquez and Clark are wearing the gear worn during the shooting and displaying their firearms. The evidence shows that the video of the shooting was subsequently uploaded to the website watchpeopledie.tv and later posted on X (formerly Twitter).

2. Persons to whom the recording was disseminated: Santiago disseminated the livestream of the attack to the individual known as "Otto" (Discord display name "Otto") via Discord video call during the attack. At approximately 4:07 p.m. PDT on May 18, 2026, Santiago also communicated with TikTok user "Took2Much999" and indicated the video was available and that Vazquez and Clark wanted her to post it.

3. Means used to release the manifesto: Santiago received the manifesto titled "The New Crusade" via Signal and took a screen recording of it at approximately 10:25 a.m. PDT on May 18, 2026. Vazquez asked Santiago to "archive" the document, which she agreed to do, responding "Of course." Santiago received Vazquez's diary logs via two Google Documents links and agreed to archive them. Santiago reminded Vasquez to delete his "e sim." Santiago admitted to investigators that she deleted a message with "Otto" on Discord in which they discussed the manifesto and that she edited a message changing her response from "Yes" to "I don't know" in response to "Otto" asking whether she had the manifesto.
4. Date and time of dissemination: Santiago screen-recorded the livestream beginning at approximately 11:17 a.m. PDT on May 18, 2026, and shared it with "Otto" in real time via Discord during the attack. The recording was uploaded to watchpeopledie.tv on May 18, 2026.

C. Particulars Regarding the Sonnenrad Patch

1. Date of purchase: On or about April 12, 2026, Santiago purchased a Sonnenrad patch.
2. Place of purchase: The Sonnenrad patch was purchased from Patch Zone World. Patch Zone World is a digital storefront powered by Shopify.
3. Price and method of payment: Discovery thus far received does not specify the price paid or the precise method of payment used by Santiago to purchase the Sonnenrad patch[1].
4. Date the patch was sent to Vazquez: On or about April 12, 2026, Santiago purchased the Sonnenrad patch and shipped it to Vazquez.
5. Address to which the patch was sent: The Sonnenrad patch was shipped to Vazquez at his Chula Vista, California residence. The specific street address of Vazquez's Chula Vista residence is 1197 Paradise Trail Rd., Chula Vista, CA 91915.
6. Method of shipment: The search warrant affidavit does not specify the carrier or shipping method used to send the Sonnenrad patch to Vazquez[2].

---

[1] The State expressly reserves the right to supplement its response upon completion of forensic review of Santiago's devices and financial records.

[2] The State expressly reserves the right to supplement its response after a complete review of applicable records.

IV. **General Reservation**

The State provides these particulars pursuant to N.C. Gen. Stat § 15A-925(e). The State expressly reserves the right to supplement and/or amend these particulars as additional evidence is developed through forensic extraction and review of seized devices, financial records, and social media account records. This Bill of Particulars is intended to inform the defense of the nature of the evidence which the State may offer and does not constitute a limitation on the specific type of evidence the State may present at trial beyond that imposed by the State's statutory and constitutional discovery obligations.

V. **Conclusion**

WHEREFORE, the State respectfully submits that the foregoing Bill of Particulars satisfies the Defendant's motion and suggests that specific deadlines for the filing of pretrial motions by either side be addressed at a later time, given the active and ongoing nature of the discovery process in this case.

Respectfully submitted,

This, the 18th day of November, 2026.

Matt Breeding
Assistant District Attorney
Prosecutorial District 31

Certificate of Service

I hereby certify that on the 18th day of November, 2026, I served a copy of the foregoing State's Response to Defendant's Motion for Bill of Particulars upon counsel for the Defendant by filing through the Odyssey electronic filing system, which provides electronic notification to:

Alan Doorasamy Sr.
Attorney for Defendant
107 Westdale Avenue
Winston-Salem, NC 27101