

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

COUNTY OF DAVIDSON STATE OF TENNESSEE

Personally appeared before _____, Judge of the Metropolitan Nashville Davidson County General Sessions Court for said State, the undersigned, Det. _____ Criminal Investigation Division, Homicide Unit, and now makes oath in due form of law that there is probable and reasonable cause to believe that the Psychological records of Audrey Hale, Female White, date of birth: 03/24/1995, and under the care of Vanderbilt Psychiatric Hospital contains certain evidence of a crime, to wit violations of state law(s) as set forth in TCA Section(s)

- Tenn. Code Ann. 39-13-201 Criminal Homicide
- Tenn. Code Ann. 33-3-105 Confidential information; disclosure without consent

and the evidence to be searched for is as follows: any and all records of psychological treatment received by Audrey Hale, a white female with a date of birth of 03/24/1995 and social security number _____ at the above facility. The requested records includes psychological treatments, evaluations, tests, and medications from Vanderbilt Psychiatric Hospital and any out source facilities between the dates of April 23rd, 2001 to March 27th, 2023.

The Affiant further testifies that the said evidence is now located and may be found in possession of said device located in Davidson County, Tennessee, and more particularly described as follows:

- Vanderbilt Psychiatric Hospital, 1601 23rd Ave S, Nashville, TN 37212

Statement of Facts In Support of Probable Cause

This affidavit is made by Det. _____ Criminal Investigation Division, Homicide Unit, who now testifies herein which is based upon information personally observed or received from other law enforcement officers, unless otherwise stated, which your Affiant believes to be true, and is as follows:

Incident Number # 2023-0181711

On March 27th, 2023 at approximately 0953 hours CDT, Audrey Hale arrived in her vehicle at The Covenant Presbyterian Church and School, located at 33 Burton Hills Boulevard, Nashville, Tennessee. Upon arriving at the school, she parked her vehicle in the parking lot on the northwest side of the building and waited in her vehicle for over 15 minutes. At 1010 hours CDT, Hale exited her vehicle, armed with a 5.56 mm caliber rifle, a 9 mm caliber carbine, and a 9 mm caliber semi-automatic pistol. She was also wearing a tactical vest carrier with pouches mounted on the carrier that contained several loaded ammunition magazines for each weapon. Hale then approached one of the entrances to the west side of the building and fired multiple rounds from her carbine through the glass doors leading into the building. The fired projectiles shattered the doors, which allowed Hale to enter the building.

The gunfire and the shattering of the glass doors drew the attention of _____ a school custodian, who had been cleaning a lobby area adjacent to the entrance Hale entered through. Upon seeing Hale, _____ turned to run but was shot by Hale multiple times with the rifle as he ran away. Upon seeing _____ no longer moving, Hale proceeded further into the building.

The smoke from the muzzle of the rifle drifted upwards and triggered a smoke alarm positioned on the ceiling near the entrance. This in turn lead to an audible fire alarm sounding throughout the building, which prompted an evacuation by church staff, school faculty and staff, and the students of the school. Meanwhile, Hale moved to a staircase leading the second floor of the building and began ascending. As students were filing towards and into the same staircase, Hale ascended the stairs and encountered them. She proceeded to fire several times with the rifle at students and faculty members present at the top of the staircase. While many of the students and faculty members were able to flee to safety, four people were shot by Hale at this time. These individuals were _____ a substitute teacher at the school, and _____ and _____, three third-grade students at the school. As other students and faculty sought safety inside classrooms and offices within the building, Hale approached the four individuals she had shot and fired close range shots into them.

Hale then moved to two third-grade classrooms in close proximity to where _____, _____, _____, and _____ had been shot. By this point the teachers for those respective classrooms had locked the doors to barricade them and students within.

Hale then fired multiple times through the windows set in each door, with the fired projectiles travelling through the windows, across the interior of each classroom, and through the exterior windows out of the school. One student within one of the classrooms, [REDACTED] received a grazing wound across the top of one shoulder from a fired projectile. None of the other students were injured during this shooting. Hale didn't make any other attempt to breach the doors or enter the classroom before moving down the hallway through the building.

Shortly after Hale ceased firing into those classrooms, [REDACTED] the principal of the school, exited the school office area on the second floor and began walking through the hallways. Based on information developed at this time, [REDACTED] had no idea a shooting occurred within the building (based on the position of fire doors within the building, the location of the office, and the audible fire alarms, she and other office staff apparently had no idea a shooting had taken place within the school). As [REDACTED] was walking through the building to investigate the fire alarm and to ensure a fire evacuation took place, Hale rounded a corner into the same hallway and encountered [REDACTED]. Hale immediately fired several shots from her rifle, which caused [REDACTED] to fall to the ground with multiple gunshot wounds. Hale then approached [REDACTED] and fired a single shot from the pistol into [REDACTED]. Hale then left this location and continued to move through the hallways.

Hale then searched the church offices within the building before returning to the first floor. She fired several shots in the lobby near the cafeteria on the first floor, which included several shots into two different television sets and through a set of doors leading to the kindergarten classrooms. Nobody was killed or struck during these incidents. Hale eventually returned to the second floor of the building and made her way into the upper gallery area of the church. Once there, Hale fired several shots from her carbine into a stained glass window depicting Adam and Eve in the Garden of Eden. After shooting this window, Hale then moved into an adjacent vestibule, where she observed police officers arriving in the parking lot outside the front entrance of the church. Upon seeing these vehicles, Hale took up a firing position at this window and fired upon police officers exiting their vehicles, forcing them to take cover. Hale maintained this position for over two minutes and fired numerous shots at those police officers. While Hale was occupied with firing upon those police officers, other police officers made their way into the building through other entrances Hale couldn't see, located her within the building, and engaged her from behind. During the engagement Hale was shot and killed by police officers. Once Hale was deceased, no other gunshots were heard and protective sweep of the building resulted in no other suspects within the building.

Once the location was secured by police officers and no other threats were detected, the responding police officers and paramedics located and evacuated [REDACTED], [REDACTED], [REDACTED], and [REDACTED] to area hospitals, where all four were later pronounced deceased. [REDACTED] was also taken to an area hospital, where she was treated and released the same day. [REDACTED] was declared deceased at the scene by the responding paramedics.

After detectives located Hale's vehicle in the parking lot, the vehicle was searched under the authority of a search warrant. During the search, detectives located Hale's cell phone, two notebooks with handwritten entries, two thumb drives, and additional loaded magazines for Hale's rifle. These items were seized as evidence at that time.

Detectives then went to where Hale lived with her parents at [REDACTED], Nashville, Tennessee, and executed an evidentiary search warrant. Within Hale's bedroom at the residence, detectives located a shotgun, a laptop computer, and over 20 notebooks and folders containing writings by Hale. Detectives also located a farewell letter written by Hale and addressed to her parents, as well as a signed last will and testament. The letter didn't provide a motive or explanation for the attack on the school and only provided instructions to them regarding the storage and safe keeping of items within her room. Also, during the execution of the evidentiary search warrant for [REDACTED], detectives located and seized several more electronic devices and a folder with a portion of Audrey Hale's medical history from Vanderbilt Psychiatric Hospital.

After the search of [REDACTED], Nashville, Tennessee was completed, detectives then interviewed Audrey Hale's parents. Audrey Hale's mother [REDACTED] advised detectives that Audrey Hale was receiving psychological treatment from Vanderbilt Hospital and has been for a while. When detectives processed the folder containing Audrey Hale's medical records, it was clear that Audrey Hale has been receiving psychological treatment from Vanderbilt Psychiatric Hospital since 2001.

Your affiant is requesting that this search warrant be granted because it would assist in confirming or denying if in any Vanderbilt Psychiatric Hospital Staff knew of the mental state of Audrey Hale. Your Affiant knows through experience it is not uncommon for patients to confide to their therapist or psychologist. Your affiant believes there is a strong possibility that Audrey Hale confided to a Vanderbilt Psychiatric Hospital Staff member since she has been receiving care there since 2001. At the moment, detectives are unsure of the mental state of Audrey Hale before and at the time of the incident. Detectives believe obtaining Audrey Hale's records from Vanderbilt Psychiatric Hospital would shed light on her mental state. Also, detectives are investigating if Audrey Hale acted alone in this incident or if there was a co-conspirator. Detectives are also investigating if Audrey Hale informed anyone of her plans to attack Covenant School. These are the reasons your affiant is requesting that this search warrant be granted.

Based on the above statement, your affiant requests the seizure any and all records of psychological treatment received by Audrey Hale, a white female with a date of birth of 03/24/1995 and social security number [REDACTED] at the above facility. The requested records includes psychological treatments, evaluations, tests, and medications from Vanderbilt Psychiatric Hospital and any out source facilities between the dates of April 23rd, 2001 to March 27th, 2023.

Experience of Affiant

Your Affiant, Detective [REDACTED], has been a certified police officer in the State of Tennessee since 2017. Currently, he is assigned as a detective for the Homicide Unit with the Metropolitan Police Department of Nashville – Davidson County, Tennessee, and prior to this assignment your affiant worked as a Police Patrol Officer in North Precinct at the same agency. During his career, your affiant has assisted or worked alone on cases involving theft, burglary, assault, aggravated assault, robbery, and deaths. Your affiant has questioned suspects, witnesses, and victims and conducted investigations with other officers. Your affiant has made arrests in Tennessee and has been involved with those cases throughout their successful prosecution.

Your Affiant knows that in order to investigate a criminal complaint, evidence should be collected as provided by law. Considering the aforementioned facts contained herein, your Affiant believes that probable cause exists to seize any and all records of psychological treatment received by Audrey Hale, a white female with a date of birth of 03/24/1995 and social security number [REDACTED] at the above facility. The requested records includes psychological treatments, evaluations, tests, and medications from Vanderbilt Psychiatric Hospital and any out source facilities between the dates of April 23rd, 2001 to March 27th, 2023 which evidence of a crime, to wit violations of state law(s) as set forth in TCA Section(s)

- Tenn. Code Ann. 39-13-202 Criminal Homicide
- Tenn. Code Ann. 33-3-105 Confidential information; disclosure without consent

I SWEAR THE FOREGOING IS TRUE UNDER PENALTY OF PERJURY.

[REDACTED]
AFFIANT

Sworn to and Subscribed before me this 1 day of June, 2023.

[REDACTED]
Judge of Part [REDACTED] of the Metropolitan Nashville Davidson County Criminal Court

SEARCH WARRANT

**COUNTY OF DAVIDSON
STATE OF TENNESSEE**

TO ANY PEACE OFFICER WITHIN OR OF SAID COUNTY:

- Proof by Affidavit having been made before me by, Det. [REDACTED] Investigation Division, Homicide Unit, that there is probable cause to believe that certain evidence of a crime, to wit: violations of state law(s) as set forth in TCA Section(s) **Tenn. Code Ann. 39-13-201 Criminal Homicide and Tenn. Code Ann. 33-3-105 Confidential information; disclosure without consent** will be found Psychological records of **Audrey Hale, Female White, date of birth: 03/24/1995, and under the care of Vanderbilt Psychiatric Hospital** and the evidence to be searched for is as follows:

Seizure of any and all records of psychological treatment received by Audrey Hale, a white female with a date of birth of 03/24/1995 and social security number [REDACTED] at the above facility. The requested records includes psychological treatments, evaluations, tests, and medications from Vanderbilt Psychiatric Hospital and any out source facilities between the dates of April 23rd, 2001 to March 27th, 2023.

YOU ARE THEREFORE COMMANDED to make an immediate seize any and all records of psychological treatment received by Audrey Hale, a white female with a date of birth of 03/24/1995 and social security number [REDACTED] at Vanderbilt Psychiatric Hospital more particularly described as follows:

any and all records of psychological treatment received by Audrey Hale, a white female with a date of birth of 03/24/1995 and social security number [REDACTED] at the above facility. The requested records includes psychological treatments, evaluations, tests, and medications from Vanderbilt Psychiatric Hospital and any out source facilities between the dates of April 23rd, 2001 to March 27th, 2023.

and if you find the same, or any part thereof, you shall seize the evidence, make a report to this Court of the evidence seized and safekeep the same in Nashville, Tennessee, pending further orders of this Court.

I HEREBY CERTIFY THAT I HAVE DELIVERED THIS SEARCH WARRANT FOR EXECUTION TO:

[REDACTED] 2:35 o'clock, on this 1 day of June, 2023.
Judge of Part I of the Metropolitan Nashville Davidson County Court

