

State of Michigan	AFFIDAVIT IN SUPPORT OF COMPLAINT	Case No: District: Circuit:
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THE COMPLAINING WITNESS, ON INFORMATION AND BELIEF, SAYS:

1. I, Sherry Workman, am a Detective Sergeant with the Michigan Department of State Police (MSP) and been employed as a law enforcement officer for over 25 years. Affiant has served in multiple capacities during my career with the Michigan State Police. I am currently assigned as a Task Force Officer to the Federal Bureau of Investigation's Detroit Joint Terrorism Task Force.
2. The Michigan State Police (MSP) and the Federal Bureau of Investigation (FBI) have jointly investigated an incident that occurred on December 11, 2019 in Dexter, Michigan. The facts of this affidavit and my knowledge of this investigation come from training, experience, and information provided to me by Federal Bureau of Investigation (FBI) Special Agents (SA) Henrik Impola, SA Jeremy Jaskulski, MSP D/Sgt. Donald Pisha and other investigators as part of a joint domestic terrorism investigation.
3. On December 11, 2019, at approximately 11:30pm, Richard Shea, his wife, and their infant child were inside their single-family residence in Dexter, Michigan. The Sheas saw two men walking near their home, flashing lights at their house, and taking pictures while on their front porch. The Sheas contacted the police.
4. Through investigation, the men on the Shea's porch were determined to be Justen Watkins and Alfred Gorman. Watkins and Gorman took a menacing photograph at the location to threaten, intimidate, and harass the occupants of the home in Dexter, Michigan because of their mistaken belief that another individual lived at that location. The photograph was uploaded to "The Base" channel on the publicly available social media platform Telegram. In the photograph, Watkins is wearing a black skull mask, a Totenkopf shirt, camouflage pants, and a tactical plate carrier with rifle magazines that has a patch of the logo for "The Base" visible on the front of the vest. The caption reads: "The Base sends greetings to Daniel Harper of the Antifa podcast "I Don't Speak German." The post (house numbers redacted from photograph):



5. "The Base" is a white supremacy organization that openly advocates for acts of violence to further its white racially motivated violent extremist ideology. The Base recruits and plans to train like-minded individuals with the goal of carrying out violent operational acts against the United States. The Base's goals include inciting a race war and creating a white ethno-state. Using online chat rooms, leadership of The Base has encouraged its members to meet in person and engage in military training in order to prepare for the insurgency. The Base has a logo, a leadership structure, and defined membership criteria, making it a gang under Michigan law. The common goal that members of The Base share is to establish a white ethno-state in the Pacific Northwest or the Upper Peninsula of Michigan. Members identify through their use of the three white Runic Eihwaz symbols on a black flag visible in the middle of Watkins' tactical plate carrier in the above photograph. Wearing this symbol allows members to easily identify other members of The Base and proclaims their ideology for all to see.
6. In early 2020, several members of The Base were arrested across the United States for criminal activities relating to their involvement in The Base. Following the highly public arrests, and "doxxing" (publishing private identifying information about an individual on the internet) of The Base's founder and then leader, Watkins announced that the former leader had appointed Watkins as the new leader of The Base.
7. The Base is organized into regional chapters so that operational security would be ideal, and information would be less likely to be leaked. The Base cells have a significant degree of autonomy regarding their activities, and criminal conduct is typically not centrally coordinated in order to foster "plausible deniability" among those not directly involved. In November 2019, Watkins was identified as a member of The Base, who conducted recruiting and produced propaganda material for the group. The same month, Watkins ran a "hate camp" for members of The Base in Bad Axe, MI where Watkins led tactical and firearms training for members of The Base. The training was documented in videos used to make recruitment and

propaganda videos for The Base. Additionally, in early 2020 Watkins submitted a manifesto he wrote to numerous Instagram users on the status of The Base that was also shared on public The Base social media channels. Within the manifesto Watkins made the declaration (emphasis in original text): "I will train with firearms, explosives, knives, Ryder trucks, and anything else I have to destroy this **KIKE SYSTEM THAT IS GENOCIDING MY people.**" He concluded the shared writing with the following call for violence (emphasis in original text): "To victory with **PURE UNADULTERATED ARYAN VIOLENCE! HAIL TERROGRAM!**"

8. Neo-nazi groups, including The Base, have conducted an online campaign to target the Shea's address under the mistaken belief the home belongs to podcaster, Daniel Harper. Harper hosts a podcast called "I don't speak German" that is critical of the neo-Nazi movement and expresses concern about the rise in white supremacy in the United States. The photograph on the Shea's porch was the latest in a series of threatening online messages about the Shea residence.
9. The photograph of Watkins on the porch of the Shea home was used by The Base to encourage harassment by members of The Base and others with white racially motivated violent extremist ideologies. Watkins communicated with another individual after realizing he had targeted the wrong house. Watkins stated that the "message got across even with the wrong house too."
10. The Base is an organization that qualifies as a gang under Michigan law. The crimes carried out by both defendants were committed on behalf of The Base.
11. Alfred Gorman, an associate of Watkins and The Base, knowingly aided and abetted Watkins' crimes. In November 2019, Gorman attended a "hate camp" hosted by Watkins and attended by members of The Base. Gorman documented the training in photographs and videos which were used as propaganda and recruitment efforts for The Base.
12. Based on my training and experience, as well as other information received from other law enforcement officers and the facts outlined in this affidavit, your Affiant believes that Justen Watkins and Alfred Gorman conspired with one another in fact in Unlawfully Posting a Message, in violation of MCL 750.411s, and Used a Computer to Commit a Felony, in violation of MCL 752.797(3)(c).
13. Your affiant believes, based upon the facts of this investigation that The Base, as an organization, has provided Watkins and Gorman the motive, means and opportunity to commit the crime of Unlawfully Posting a Message, in violation of MCL 750.411u.

Count 1 – Unlawful Posting a Message

Did post a message through the use of any medium of communication, including the internet or a computer, computer program, computer system, or computer network, or

other electronic medium of communication, without the victim's consent, if all of the following apply: (a) The person knows or has reason to know that posting the message could cause 2 or more separate noncontinuous acts of unconsented contact with the victim. (b) Posting the message is intended to cause conduct that would make the victim feel terrorized, frightened, intimidated, threatened, harassed, or molested. (c) Conduct arising from posting the message would cause a reasonable person to suffer emotional distress and to feel terrorized, frightened, intimidated, threatened, harassed, or molested. (d) Conduct arising from posting the message causes the victim to suffer emotional distress and to feel terrorized, frightened, intimidated, threatened, harassed, or molested; contrary to MCL 750.411s.

Count 2 – Gang Membership Felonies

Being as associate or member of a gang, did commit or attempt to the commit the felony of Unlawful Posting a Message, and his association or membership in the gang provided the motive, means, or opportunity for committing the crime; contrary to MCL 750.411u.

Count 3 – Using a Computer to Commit a Felony

Did use a computer program, computer, computer system, or computer network to commit, attempt to commit, conspire to commit, or solicit another person to commit a crime where the underlying crime has a maximum term of imprisonment of 2 year or more but less than 4 years, contrary to MCL 752.797(3)(c).

FURTHER AFFIANT SAYETH NOT.

Dated: _____



Detective/Sergeant

STATE OF MICHIGAN
COUNTY OF _____

Subscribed and sworn to before me
This ___ day of October, 2020.

_____, NOTARY PUBLIC
_____, COUNTY, MICHIGAN
MY COMMISSION EXPIRES: _____