

| | | |
|------------------------------|--|--|
| State of Michigan | AFFIDAVIT IN SUPPORT OF COMPLAINT | Case No: District: Circuit: |
|------------------------------|--|--|

THE COMPLAINING WITNESS, ON INFORMATION AND BELIEF, SAYS:

1. I, Brian Russell, am a Detective Sergeant with the Michigan Department of State Police and been employed as a law enforcement officer for over 20 years. Affiant has served in multiple capacities during my career with the Michigan State Police.
2. The Michigan State Police (MSP) and the Federal Bureau of Investigation (FBI) have jointly investigated an anti-government militia group within Michigan called the Wolverine Watchmen, an anti-government, anti-law enforcement, militia group who have performed tactical training at 8008 Dunn Rd., Munith, Michigan (Jackson County). The Wolverine Watchmen and associates have made terroristic threats towards government officials and organizations and provided material support for planned acts of terrorism. 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 and Jayson Chambers, MSP D/Sgt. Brian Russell and other investigators as part of a joint domestic terrorism investigation.
3. In early 2020, FBI became aware of groups of individuals in several states that were discussing a violent overthrow of government and law enforcement entities. These groups agreed to unite others in their cause and take violent action against government entities they believed to be violating the U.S. Constitution.
4. The “Wolverine Watchmen” is a militia group who recruited members using a social media platform, FaceBook, since November 2019. Once recruited, members communicated via a secure, encrypted messaging platform. Members of Wolverine Watchmen periodically met for “field training exercises” (FTXs) on private property in remote areas where they engaged in firearms training and tactical drills to prepare for the “boogaloo,” a terms referencing a violent uprising against the government or impending politically-motivated civil war. Joseph Morrison and Pete Musico are founding members of the Wolverine Watchmen. Joseph Morrison is considered Wolverine Watchmen’s “Commander” and is known by the online moniker “Boogaloo Bunyan.”
5. The Wolverine Watchmen have called on members to identify law enforcement officers home addresses in order to target the officers, have made threats of violence to instigate a civil war leading to societal collapse, and have engaged in planning and training for an operation to attack the Capitol of Michigan, and kidnap Government officials including the Governor of Michigan.

6. Joseph Morrison and Pete Musico are individuals that reside at 8008 Dunn Rd., Munith, Michigan located in Jackson County where FTXs have been conducted. Joseph Morrison and Pete Musico have hosted multiple tactical training sessions with other members of the Wolverine Watchmen at their property. During these trainings, specific training was provided for members to learn and practice tactical maneuvers. The group has drawn upon their members' individual skills for trainings including tactical skills, medical knowledge, communications knowledge, and weapons expertise. For instance, member Paul Bellar, who was appointed the role of "Sergeant," had specific expertise in medical and firearms training and designed tactical exercises for training.
7. Wolverine Watchmen members together with another group of individuals led by Adam Fox engaged in planning and training for various acts of violence, including kidnapping politicians and storming the Michigan Capitol Building in Lansing.
8. Ultimately, participants of these trainings and meetings, led by Michigan resident Adam Fox, went on to engage in a plot to kidnap the Governor of Michigan by the November 2020 national election. In preparing for this plot, Shawn Fix, William Null, Michael Null and Eric Molitor all aided in physical surveillance of the Governor's private vacation home. Several other members of this conspiracy are being charged federally for their part in the plot to kidnap the Governor.
9. 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 Paul Bellar conspired with others and in fact provided material support and resources in the furtherance of terrorist acts. In particular, Paul Bellar has provided plans for tactical maneuvers at trainings, coded language for covert communication, hosted meetings at his residence, provided ammunition, and coordinated logistics for trainings contrary to MCL 750.543k. While providing material support to a terrorist, Paul Bellar was in possession of a firearm.
10. Your affiant believes, based upon the facts of this investigation, that the Wolverine Watchmen as an organization, sub-groups of Wolverine Watchmen, or associates of Wolverine Watchmen have provided the means and opportunity to commit material support for terrorism, in violation of MCL 750.411u.
11. By pooling the skills of its members and providing training, the Wolverine Watchmen organization and its associates have provided training and expertise to materially support and provide resources to plan, prepare, carry out or facilitate acts of terrorism.

Count 1 – Providing Material Support for Terrorist Acts

Did knowingly provide material support or resources to a terrorist or a terrorist organization, to be used in whole or in part, to plan, prepare, carry out, facilitate, or avoid apprehension for committing an act of terrorism against the United State or its citizens, this state or its citizens, or a political subdivision of any other instrumentality of this state or of a local unit of government; contrary to MCL 750.543k(1)(b).

Count 2 – Gang Membership Felonies

Being as associate or member of a gang, did commit or attempt to the commit the felony of Providing Material Support for Terrorist Acts 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 – Felony Firearm

Did carry or have in his possession a firearm to-wit: rifle, at the time he committed or attempted to commit a felony, to-wit: providing material support to a terrorist MCL 750.543k; contrary to MCL 750.227b

FURTHER AFFIANT SAYETH NOT.

Dated: _____

Detective/Sergeant Brian Russell

STATE OF MICHIGAN

COUNTY OF _____

Subscribed and sworn to before me

This ___ day of October, 2020.

_____, NOTARY PUBLIC

_____ COUNTY, MICHIGAN

MY COMMISSION EXPIRES: _____