

STATE OF MICHIGAN 12th JUDICIAL DISTRICT 4th JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 96-20900969-01 MSP #:
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District Court ORI: MI380025J

Circuit Court ORI: MI380015J

AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN v PAUL EDWARD BELLAR [REDACTED] MILFORD, MI 48381			Victim or complainant: STATE OF MICHIGAN
Co-defendant(s) Pete Musico AKA Phillip Westenberger, Joseph Matthew Morrison			Complaining Witness [REDACTED]
City/Twp./Village County of Jackson	County in Michigan Jackson	Defendant SID	Date: On or about 11/01/2019 to 10/07/2020
Charge(s) See Below			Defendant DOB [REDACTED]
			Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF JACKSON

The complaining witness says that on the above date range and in Munith, Jackson County, MI, the defendant, contrary to law,

COUNT 1: TERRORIST ACTS - PROVIDING MATERIAL SUPPORT

did knowingly provide material support or resources to a terrorist or 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 States or its citizens, this state or its citizens, or a political subdivision or any other instrumentality of this state or of a local unit of government; contrary to MCL 750.543k(1)(b). [750.543K1B]

FELONY: 20 Years and/or \$20,000.00; reimburse government for expenses incurred from violation (see MCL 750.543x & 769.1f)

COUNT 2: GANG MEMBERSHIP FELONIES

being an associate or member of a gang, did commit or attempt to commit the felony of providing material support for acts of terrorism contrary to MCL 750.543K and his association or membership in the gang provided the motive, means or opportunity for committing the crime; contrary to MCL 750.411u. [750.411U]

FELONY: 20 Years. A consecutive sentence may be imposed for a conviction on the underlying offense.

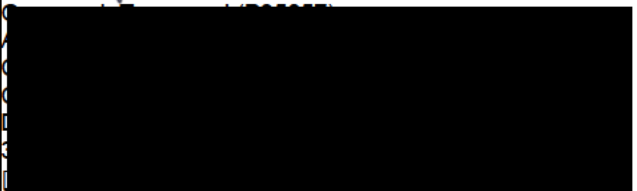
COUNT 3: WEAPONS - FELONY FIREARM

did carry or have in his/her 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. [750.227B-A]

FELONY: 2 Years consecutively with and preceding any term of imprisonment imposed for the felony or attempted felony conviction; Mandatory forfeiture of weapon or device [See MCL 750.239]

Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on 10-07-2020
by:  Date


Complaining witness signature _____

Subscribed and sworn to before me on _____
Date

Judge/Magistrate/Clerk _____ Bar no. _____

STATE OF MICHIGAN 12th JUDICIAL DISTRICT 4th JUDICIAL CIRCUIT	WARRANT FELONY	DISTRICT: CIRCUIT: CTN: 96-20900969-01 MSP #:
District Court ORI: MI380025J	Circuit Court ORI: MI380015J	AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN

v

PAUL EDWARD BELLAR

MILFORD, MI 48381

Victim or complainant:
STATE OF MICHIGAN

Complaining Witness

Height: 6'02"	Weight: 190 lbs	Hair Color: UKN	Eye Color: BRO	Race: UKN	Sex: M	Date: On or about 11/01/2019 to 10/07/2020
City/Twp./Village County of Jackson	County in Michigan JACKSON	Defendant SID	Defendant DOB	Maximum Penalty See Below		
Charge(s) See Below						

STATE OF MICHIGAN, COUNTY OF JACKSON

To any peace officer or court officer authorized to make arrest: The complaining witness has filed a sworn complaint in this court stating:

COUNT 1: TERRORIST ACTS - PROVIDING MATERIAL SUPPORT

did knowingly provide material support or resources to a terrorist or 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 States or its citizens, this state or its citizens, or a political subdivision or any other instrumentality of this state or of a local unit of government; contrary to MCL 750.543k(1)(b). [750.543K1B]

FELONY: 20 Years and/or \$20,000.00; reimburse government for expenses incurred from violation (see MCL 750.543x & 769.1f)

COUNT 2: GANG MEMBERSHIP FELONIES

being an associate or member of a gang, did commit or attempt to commit the felony of providing material support for acts of terrorism contrary to MCL 750.543K and his association or membership in the gang provided the motive, means or opportunity for committing the crime; contrary to MCL 750.411u. [750.411U]

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COUNT 3: WEAPONS - FELONY FIREARM

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FELONY: 2 Years consecutively with and preceding any term of imprisonment imposed for the felony or attempted felony conviction; Mandatory forfeiture of weapon or device [See MCL 750.239]

Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

Upon examination of the complaining witness, I find that the offense(s) charged has/have been committed and that there is probable cause to believe that defendant committed the offense(s). THEREFORE, IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN, I order you to arrest and bring defendant before the 12th District Court immediately.

The defendant may be released before arraignment if \$_____ is posted as interim bail

by_____.
Date

_____	(SEAL)	_____
Date	Judge/Magistrate	Bar no.

RETURN

As ordered in this warrant, the defendant was arrested on _____ at _____
Date Time
at _____
Place of arrest

Date

Peace officer

PROSECUTION TO BE HANDLED BY:

Gregory J. Townsend (P35857)

STATE OF MICHIGAN
12th JUDICIAL DISTRICT
4th JUDICIAL CIRCUIT

**ADULT
BINDER**

DISTRICT:
CIRCUIT:
CTN: 96-20900969-01
MSP #:

District Court ORI: MI380025J

Circuit Court ORI: MI380015J

AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN

v

PAUL EDWARD BELLAR

MILFORD, MI 48381

Victim or complainant:
STATE OF MICHIGAN

Complaining Witness

Co-defendant(s)
Pete Musico AKA Phillip Westenberger, Joseph Matthew Morrison

Date: On or about
11/01/2019 to 10/07/2020

City/Twp./Village
County of Jackson

County in Michigan
JACKSON

Defendant SID

Defendant DOB

Charge(s)
See Below

Maximum Penalty
See Below

Date: _____

District Judge: _____

Bar no.

Reporter/Recorder

Cert. no.

Represented by counsel

Bar no.

EXAMINATION WAIVER

1. I, the defendant, understand:

- a. I have a right to employ an attorney.
- b. I may request a court appointed attorney if I am financially unable to employ one.
- c. I have a right to a preliminary examination where it must be shown that a crime was committed and probable cause exists to charge me with the crime.

2. I voluntarily waive my right to a preliminary examination and understand that I will be bound over to circuit court on the charges in the complaint and warrant (or as amended).

Defendant attorney

Bar no.

Defendant

ADULT BIND OVER

☐ 3. Examination has been waived.

☐ 4. Examination was held and it was found that probable cause exists to believe both that an offense not cognizable by the district court has been committed and that the defendant committed the offense.

☐ 5. The defendant is bound over to circuit court to appear on _____ at _____ m.

Date

Time

☐ on the charge(s) in the complaint.

☐ on the amended charge(s) of _____

_____ MCL/PACC Code _____

6. Bond is set in the amount of \$_____. Type of bond: _____ ☐ Posted

Date

Judge

Bar no.

STATE OF MICHIGAN 12th JUDICIAL DISTRICT 4th JUDICIAL CIRCUIT		INFORMATION FELONY		DISTRICT: CIRCUIT: CTN: 96-20900969-01 MSP #:
District Court ORI: MI380025J		Circuit Court ORI: MI380015J		AG ORI: MI820025A
THE PEOPLE OF THE STATE OF MICHIGAN v PAUL EDWARD BELLAR ██████████ MILFORD, MI 48381				Victim or complainant: STATE OF MICHIGAN Complaining Witness ██
Co-defendant(s) Pete Musico AKA Phillip Westenberger, Joseph Matthew Morrison				Date: On or about 11/01/2019 to 10/07/2020
City/Twp./Village County of Jackson	County in Michigan JACKSON	Defendant SID		Defendant DOB ██████████
Charge(s) See Below				Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF JACKSON
IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: Dana Nessel, Attorney General for the State of Michigan, appears before the court and informs the court that on the above date range and in Munith, Jackson County, MI, the defendant:

COUNT 1: TERRORIST ACTS - PROVIDING MATERIAL SUPPORT
did knowingly provide material support or resources to a terrorist or 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 States or its citizens, this state or its citizens, or a political subdivision or any other instrumentality of this state or of a local unit of government; contrary to MCL 750.543k(1)(b). [750.543K1B]

FELONY: 20 Years and/or \$20,000.00; reimburse government for expenses incurred from violation (see MCL 750.543x & 769.1f)

COUNT 2: GANG MEMBERSHIP FELONIES
being an associate or member of a gang, did commit or attempt to commit the felony of providing material support for acts of terrorism contrary to MCL 750.543K and his association or membership in the gang provided the motive, means or opportunity for committing the crime; contrary to MCL 750.411u. [750.411U]

FELONY: 20 Years. A consecutive sentence may be imposed for a conviction on the underlying offense.

COUNT 3: WEAPONS - FELONY FIREARM
did carry or have in his/her 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. [750.227B-A]

FELONY: 2 Years consecutively with and preceding any term of imprisonment imposed for the felony or attempted felony conviction; Mandatory forfeiture of weapon or device [See MCL 750.239]

Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

and against the peace and dignity of the State of Michigan.

Date

Gregory J. Townsend (P35857)

[REDACTED]

STATE OF MICHIGAN 12TH DISTRICT COURT #2 4th JUDICIAL CIRCUIT	MITTIMUS FELONY	CASE NO: 2020900969
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The People of the State of Michigan

vs

Paul Edward Bellar 96-20900969-01

Offense Information

Date of Offense 11/01/2019 to 10/07/2020		Police Agency / Report No. 00AG	
SEX M	RACE U	DOB [REDACTED]	SID X209009691

Defendant(s)

Charge(s)
750/543K1B 01
750/411U 01
750/227B-A 01

Type of offense

BOND HISTORY

Defendant Alias(s):

HOLDS:

[] Felony

[] Misdem.

Date
SetDate
Posted

Type

Amount

CAUTIONS:

Scheduled court appearances:

(SEAL)

DATE	TIME	COURT LOCATION

To the Sheriff or Custodial Agency: You are directed to hold the above named Defendant(s) in your care and custody until further order of the Court, or until such time as bail bond or personal recognizance is posted. When the Defendant is in your custody, you are to bring the Defendant to all hearings and Court appearances, or otherwise as directed by the Court.

Date

Judge/Magistrate

Bar no.

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, 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: _____