AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America
v.
KENNETH WAYNE BARDWELL

Case No.

Case: 2:26–mj–30421
Assigned To : Unassigned
Assign. Date : 7/14/2026
Description: RE: SEALED MATTER (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 2018 - Present in the county of Wayne in the Eastern District of Michigan, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. §1343	Wire Fraud

This criminal complaint is based on these facts:

☑ Continued on the attached sheet.

Complainant's signature

Julia MacBeth, Special Agent
Printed name and title

Sworn to before me and signed in my presence and/or by reliable electronic means.

Judge's signature

Date: July 14, 2026

City and state: Detroit, Michigan

David R. Grand - Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Julia MacBeth, Special Agent for the Federal Bureau of Investigation (FBI), being first duly sworn, declare and say the following is true based on my personal knowledge and belief:

Affidavit Summary

This affidavit is submitted in support of a criminal complaint and arrest for KENNETH WAYNE BARDWELL. The evidence set forth in this affidavit shows that there is probable cause that KENNETH WAYNE BARDWELL has been engaged in an investment fraud scheme involving Motown Sports Group Holdings, Inc., in the Eastern District of Michigan in violation of 18 U.S.C § 1343- wire fraud. KENNETH WAYNE BARDWELL by means of false pretenses and misrepresentations, solicited investments for the development of a multi-billion-dollar sports complex to be built in Romulus, Michigan, in exchange for stock certificates for when the business became a publicly traded company. Evidence collected throughout this investigation determined that KENNETH WAYNE BARDWELL has made almost no effort to use the millions of dollars solicited from hundreds, possibly thousands, of community members as investments towards the purchase of land needed to develop the project, instead using most of the investors' money on gentleman's clubs, luxury retail goods, rental cars, and living expenses for himself, his wife and his girlfriend.

Agent Background

1. I am a Special Agent of the FBI and, as such, an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. 2510(7). I am empowered to conduct investigations of, and to make arrests for offenses enumerated in Title 18 of the United States Code.

2. I have been employed by the FBI since May 2016. Prior to joining the FBI, I was a Federal Air Marshal from December 2010 until April 2016. I have received law enforcement training at the Federal Law Enforcement Training Center (FLETC) and the FBI Academy. During my employment with the FBI, I have investigated federal crimes involving mail fraud, wire fraud, bank fraud, money laundering, cyber enabled frauds, investment fraud, identity theft, and various other criminal matters. At all times during the investigation described in this affidavit, I have been acting in an official capacity as a Special Agent of the FBI.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is submitted for the limited purpose of showing that there is

sufficient probable cause for the requested warrant and thus does not set forth all my knowledge about this matter.

Purpose of Affidavit

4. This affidavit is made in support of a criminal complaint and arrest warrant for KENNETH WAYNE BARDWELL (herein known as BARDWELL) of violations of Title 18 U.S.C. §1343 (Wire Fraud).

5. Since 2014, BARDWELL and associates through their companies Motown Sports Group Holdings, Inc. and Motown Sports Real-Estate Acquisitions Land & Development, LLC (collectively, MOTOWN SPORTS) have claimed to be developing a multi-billion-dollar entertainment and youth travel sports complex in the City of Romulus, Michigan. They publicly solicited investments into the project. MOTOWN SPORTS has a public website, a crowdfunding site, paid local television news segments and billboards around the City of Detroit, advertising the project and soliciting investments to fund the acquisition of land to build the facility.

Image 1: Motown Sports Billboard

6. An internet search revealed that in 2024, BARDWELL and his MOTOWN SPORTS advisors presented a plan to the City of Romulus, requesting $152 million in public bonds with a 15-mill tax increase and a 2% sales tax in a limited area of the city to pay for the proposed $1.44 billion development. This was denied, due to serious legal concerns with the proposed financing proposal. According to information provided to the FBI by witnesses close to the project, MOTOWN SPORTS has not raised the capital needed to purchase the land and the investors have been told several times that the deal was close to closing, only to have it not happen repeatedly. The evidence set forth in this affidavit shows that BARDWELL's project is really an investment fraud scheme, and he persuaded investors to give him large sums of money which he spent on a lavish lifestyle for himself.

7. BARDWELL has an extensive history of making claims about developing sports complexes around Detroit and the Midwest including locations such as Romulus, Pontiac, Vandalia (IL), and Winchester (KY), among others. Multiple news articles have highlighted BARDWELL's failed attempts to develop a sports facility at multiple locations as far back as 2009; none of which were ever developed. The location of the proposed project changed throughout the years with investors' funds being rolled over into the next project.

Probable Cause

8. In June 2025, the FBI's Detroit Fraud and Financial Crimes Task Force and the Birmingham Police Department received a complaint which had been made to the Birmingham Police Department. The victim (herein referred to as Victim 1) reported that BARDWELL was orchestrating an investment fraud scheme through his company, MOTOWN SPORTS. Victim 1 gave BARDWELL money to invest in the development of a sports facility in Romulus, Michigan. BARDWELL then offered to pay Victim 1 to move to Michigan from Florida to act as his personal security. Victim 1 provided details of BARDWELL's business and misrepresentations.

The Pitch

9. After receiving Victim 1's initial complaint, I have observed multiple large billboards around the City of Detroit, advertising MOTOWN SPORTS. The billboards displayed the websites MotownSportsGroupHoldings.com and ProjectMotown.com.

10. On May 14, 2026, a local news affiliate published a sponsored article "$3B Sports Complex Set to Transform Romulus into Youth Sports Hub". The article states *"The project is led by CEO and Chairman Kenneth Wayne Bardwell and draws on advisory expertise from AECOM Sports and Legends Global in addition to JLL."* Three representatives from MOTOWN SPORTS appeared in a live news segment advertising the project while displaying the website www.motownsportsgroupholdings.com. Support from community officials, specifically the Mayor of Romulus, was used to promote the project. An advertisement for MOTOWN SPORTS was also featured during the news hour with a tagline of "You only fail when you stop trying".

11. The website www.motownsportsgroupholdings.com claims that the mission of MOTOWN SPORTS is "to establish itself as a world-class sports and entertainment facility by creating jobs and training opportunities for Metro Detroit residents." The website lists all the features that the facility will include such as an indoor football field, an adult day care center, four hockey rinks, an indoor tropical

water surf park, a 10,000-seat arena, two IMAX theatres, a pet hotel, three full service hotels, Top Golf, and a spa. The website features multiple mockup graphics depicting a grand youth sports destination.

Image 2: Graphic featured on www.motownsportsgroupholdings.com

12. The website www.motownsportsgroupholdings.com is registered through NAMECHEAP, which is headquartered in California. NAMECHEAP servers are located in Phoenix, Arizona, Nottingham, UK, and Amsterdam, Netherlands.

13. A second website featured on the billboards, redirects to a PicMii crowdfunding website for MOTOWN SPORTS soliciting investment interest. The project description on the crowd funding site stated, "*The Motown Sports Village is a 456-acre $1.9 billion net-zero energy project, located in Romulus, Michigan, in*

the 13th congressional district, approximately 15 miles west of the city of Detroit, and just outside the Detroit Metropolitan Airport." The website lists BARDWELL as the Chairman and Chief Executive Officer. Again, quotes of support from community leaders were featured to promote the project. As of December 2025, over $6,740,000 in investment interest had been shown on the website and the offering was deemed "closed."

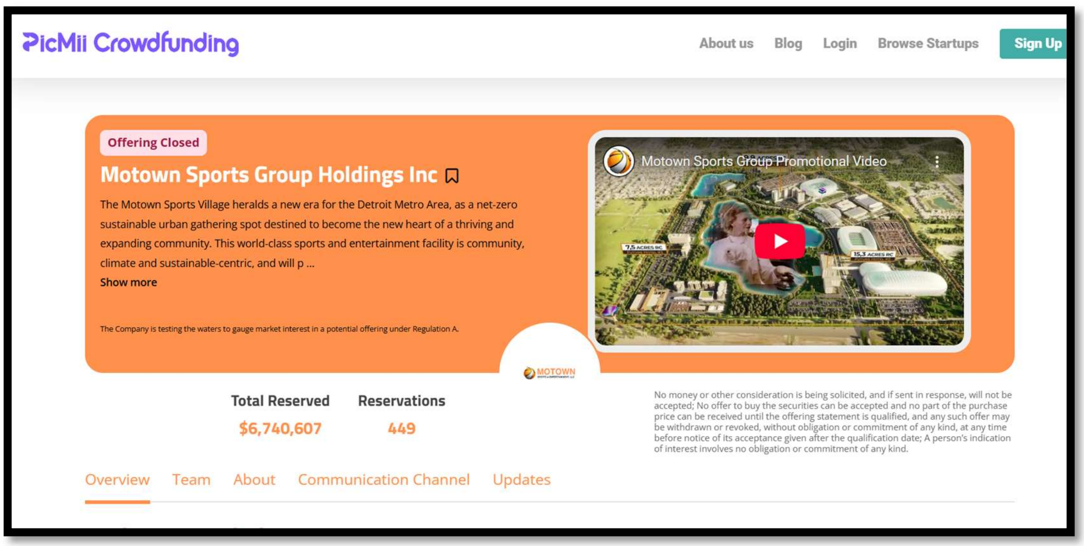

Figure 2: www.picmiicrowdfunding.com Reservation for Motown Sports Group Holdings Inc

14. The website www.projectmotown.com is registered through Network Solutions LLC, which is headquartered in Florida. Network Solutions LLC's shared hosting servers are located in a facility in the Boston area in the state of Massachusetts.

15. An investor slide deck was publicly available to download on the PicMii Crowdfunding site. In the slide deck, under the title "Investment

Opportunity" featured a slide stating "*Motown Sports is seeking equity investment to purchase 450 plus acres and to begin the predevelopment phase of the project. The company is offering $150 million dollars in the form of a convertible note. Investors will have the option of a Regulation D or a Regulation A instrument. For more information feel free to contact Kenneth Bardwell at motownfacility@yahoo.com.*"

16. According to Victim 1, MOTOWN SPORTS provided updates on the project regularly via email from motownfacility@yahoo.com. Victim 1 shared these emails with the FBI. One email contained an attachment titled "Motown Sports Agreement Executive Summary Business Plan." This was provided to investors in the project. It listed BARDWELL as the Chairman and Chief Executive Officer and it stated that the funds raised in the minimum offering will be used to purchase the land for the development and to prepare the property for development." It further stated, "If either (i) subscriptions for the Minimum Offering are not received or (ii) the conditions precedent to closing the purchase of the Property have not been completed…all proceeds will be returned to the investors from escrow."

17. I know from my professional experience, when you send an email, the message travels over the internet, which is inherently a method of interstate commerce. Even if both the sender and recipient are in the same state, the data

packets that carry your email typically pass through servers and networks in other states before reaching the destination. According to Yahoo Inc's website, while the exact physical locations of Yahoo email servers are not publicly disclosed, they are primarily housed in U.S. data centers with additional global infrastructure.

18. In October 2025, an undercover FBI employee reached out to *motownfacility@yahoo.com* requesting information on the project. A response was received from C.T., MOTOWN SPORTS Shareholder/Investor Liaison, providing a non-disclosure agreement and an invitation to attend a virtual presentation. The virtual presentation was conducted by members of MOTOWN SPORTS who detailed the history of MOTOWN SPORTS. MOTOWN SPORTS originally attempted to build the project in Waterford, Michigan but decided to move the project to Romulus after it was discovered the land in Waterford had contaminated water and the land was sold out from under MOTOWN SPORTS. The undercover employee was told the project expanded greatly when Top Golf wanted to join the project and a waterpark was added. A subscription agreement was offered. Investors would receive a certificate of participation in the company. It was pitched that the project was going to close on the sale of the land in the first quarter of 2026. Groundbreaking was expected to occur in 2026 and MOTOWN SPORTS was starting to look at a second location in Georgia. According to a MOTOWN SPORTS representative on the call, MOTOWN SPORTS raised $8 million

already, which was spent on development fees, renderings, architects, drawings, and environmental studies. Dividends could be paid out in as soon as four years once the company became publicly traded with an IPO. Another potential investor on the call asked if studies were available to review and was told studies were available to review depending on the level of investment.

19. In reality, the evidence gathered through the course of this investigation showed that BARDWELL had no intention of honoring these fraudulent promises. BARDWELL's banking activity in current and closed accounts showed that his intent was to support a lavish lifestyle for himself and his associates by continuing to make promises to investors, in order to get them to continue to give him more funds.

20. Victim 1 stated that BARDWELL required potential shareholders and current shareholders to sign non-disclosure agreements. I know from my training and experience that this is a common tactic used in fraud schemes to deter victims from reporting suspected fraud out of fear of civil litigation.

21. Another victim, (herein referred to as Victim 2) who invested in MOTOWN SPORTS filed a report on the FBI tip line. Victim 2 was suspicious that the development project was a scam since there had been no progress in acquiring the land to build the complex. Victim 2 was given an investment pitch by BARDWELL and Victim 2 invested $5,000 in exchange for stock certificates

for when MOTOWN SPORTS went public. Victim 2 also provided the FBI with many email updates from MOTOWN SPORTS.

22. I have reviewed BARDWELL's emails provided by Victim 2. One email contained an investor slide decks with updated timelines, since the land for the project was not acquired at the now-past deadline, and updated non-disclosure agreements for the shareholders to sign. One email sent from BARDWELL's email address to over 250 people welcomed all the new shareholders who had invested in the project. Most of the emails were signed by BARDWELL as the "Chairman."

23. According to MOTOWN SPORTS' investor handouts reviewed by the FBI, the Motown Sports Village development would be built on over 450 acres in Romulus. According to images on the www.motownsportsgroupholdings.com website, the proposed site location was between Wick Road and Ecorse Road, west of Vining Road. The current owner of this land was Ashley Capital under the name Metro World Commerce Center, LLC. According to representatives from Ashley Capital, BARDWELL has had a purchase agreement on the land for seven years. Annually, BARDWELL made a deposit of around $100,000 to hold the land which would be put towards the sale of the property once it occurred. On May 29th, 2026, BARDWELL went to Ashley Capital's office and provided $60,000 to extend the purchase agreement on the property once again. Ashley Capital informed

BARDWELL they would not be extending the hold on the land past June 30th, 2026. Therefore, if BARDWELL did not come up with $28 million, the full purchase price of the land, by June 30th, the land would be put back on the market for sale. After being told this, BARDWELL told an employee of Ashley Capital that "my life depends on this" and that 1,800 people had invested in this project.

24. Representatives from the City of Romulus, including the mayor, were interviewed by the FBI. They stated that BARDWELL and associates pitched the development at the Romulus city council meeting in 2024, which was used to promote the project to investors. However, this is not a normal step in developing a project of this size. BARDWELL made monetary requests to the city that were not legal in the State of Michigan. Whenever the city requested detailed plans for the project from BARDWELL, they were not provided. BARDWELL asked the Mayor of Romulus to sign a letter of support annually, which the mayor did since he believed the sports complex would be a good thing for the community. BARDWELL continually used these letters to promote the project with potential investors and quoted the letter on MOTOWN SPORTS websites. The Romulus officials started to become concerned when necessary steps to start a development project were never taken, such as contacting the Michigan Economic Development Center, site surveys, and the submissions of detailed zoning plans as requested by the City of Romulus. Whenever BARDWELL promoted the project in the news,

the city offices would receive numerous calls asking about the legitimacy of the project. The city officials unanimously began to feel this project was a scam and there were no actual plans made to build the facility as represented to the City of Romulus by BARDWELL.

The Financials

25. I have reviewed bank records for BARDWELL, his wife S.B., and multiple MOTOWN SPORTS companies. The records show that funds which were intended for the purpose of investments have extensively been used for personal expenses. Since June 2022, BARDWELL and MOTOWN SPORTS have closed multiple accounts, switching banks each time. Bank records show a MOTOWN SPORTS business checking account was held at JP Morgan Chase (0581) from June 2022 through July 2024 (Motown Sports JMPC x0581). Over the review period of 26 months, the MOTOWN SPORTS business account had $3,927,253 deposited into it. The monthly statements show the funds were often deposited, then withdrawn at a rate of nearly one to one. Only four times in the 26-month review period did the account have a monthly ending balance of more than $20,000. In 12 months of the 26-month review period, the account had a monthly ending balance of less than $1,000. In my experience, this pattern of deposits and withdrawals is not consistent with the banking practices exhibited by legitimate

businesses, including those engaging in large-scale real estate development projects.

26. Of the $3,927,253 that was deposited into the Motown Sports JPMC x0581, approximately $2,991,796 was deducted by withdrawal. Additionally, there were approximately $12,285 in high-end purchases from Gucci, Louis Vuitton, Balenciaga, Neiman Marcus, and Foot Locker. Furthermore, there were $43,289 in charges to strip clubs in Dearborn and Romulus. There was no indication that any of the investor funds were placed into an escrow account with the intended purpose of purchasing land for the proposed project.

27. The JP Morgan Chase records for MOTOWN SPORTS show incoming wires from investors in June 2022. According to copies of emails provided to the FBI, the same investors that sent wires to MOTOWN SPORTS as early as 2022 were listed recipients of “investor only” emails sent to BARDWELL’s email address in January 2026 indicating those wires were likely investments in this specific sports facility development.

28. After Motown Sports JPMC x0581was closed, MOTOWN SPORTS and BARDWELL opened several accounts with Huntington Bank. The first checking account (Huntington Bank x8891) was opened in June of 2024 with $41,050 deposited into the account. The Huntington account remained active until July of 2025 with a total of $4,449,681 deposited into it over the 14 months. The

deposits were a mix of cash, checks from investors and transfers from other MOTOWN SPORTS accounts, which were also funded by investor's checks. Memos on the deposited checks cite "Series A Stock", "Investment Motown Sports" and "20,000 Share Motown Sports Land Development". One check deposited into the account was from a Detroit church for $10,000 with a memo stating, "Investment for Church". During the review period, there were approximately $109,958 in high-end purchases from Zeidman's Jewelry, Tappers, Neiman Marcus, Balenciaga, Gucci, Louis Vuitton, Christian Louboutin, Nike, and 42nd Street Clothing. There were $122,890 in charges at local strip clubs in Romulus and Dearborn.

29. In June of 2025, MOTOWN SPORTS opened an additional Huntington Bank account (Huntington Bank x7576). Huntington Bank x7576 remained active until September of 2025 with approximately $1,330,350 deposited into the account over the four-month review period. During the review period, there were $11,862 in high-end purchases at Zeidman's Jewelry and The Nike Store. Over the four-month review period, there were $34,337 in charges at local strip clubs in Romulus and Dearborn. In bank records for Motown Sports JPMC x0581and Huntington Bank (8891/7576), there are no indications that investor money was placed into escrow with the intended purpose of purchasing land for the proposed project. Almost all checks marked as investments were deposited into personal or business

accounts for BARDWELL or MOTOWN SPORTS and then quickly withdrawn as cash. Checks deposited into the accounts had memos such as "7000 Additional Series A", "Series A Stock", "Loan or Stock to be Issued", "Share Romulus Development", "Investment 10,000 Additional Stocks", "Shares of Project-Project Romulus" and "For Stocks". None of the banks utilized by BARDWELL or MOTOWN SPORTS provided documents relating to any escrow accounts. Since June 2024, bank reporting indicates BARDWELL has made $2.3 million in cash withdrawals funded by check deposits from MOTOWN SPORTS business accounts. There are no other legitimate sources of income found in the bank statements. The majority of deposits into the bank accounts are investor deposits. There is probable cause that these are ill-gotten criminal proceeds because of Bardwell's promises to induce the payments.

30. For example, Huntington Bank x7576 had multiple checks deposited with memos mentioning investments or stocks from investors located in several states outside of Michigan. One wire was sent with a memo of "purchase of 7500 shares of Motown Sports" from a victim residing in Georgia. The wire originated from a JP Morgan Chase account in New York. I know from my professional experience, when a sender's bank sends the payment order to the recipient's bank, the transaction moves through the U.S. banking system, which is inherently

interconnected across states. Huntington Bank x7576 was closed in September 2025 with a closing balance of $11,019.38

31. According to Michigan tax records, since 2019 BARDWELL has never filed taxes for investment income received for MOTOWN SPORTS. Since 2019, BARDWELL has also not filed personal taxes with the exception of a partial return for himself in 2023 for taxable gambling winnings.

Inside Motown Sports

32. On May 21, 2026, I interviewed an exotic dancer (CI1) from a strip club in Dearborn. CI1 was pitched to invest in the project by BARDWELL. In the fall of 2025, CI1 went to work for BARDWELL at MOTOWN SPORTS. BARDWELL would recruit exotic dancers from the strip clubs to work at MOTOWN SPORTS. BARDWELL employed people who had little business experience. CI1 and the other female employees of MOTOWN SPORTS would run personal errands for BARDWELL and make copies of investment brochures. The women were often targeted against each other. CI1 worked out of a FedEx Office Print & Ship Center on Orchard Lake Road with about ten other employees. BARDWELL paid the manager of the FedEx store to allow them to work there. Physical surveillance conducted in June 2025 by the FBI confirmed BARDWELL met with known MOTOWN SPORTS employees inside the FedEx store.

Figure 3: BARDWELL and MOTOWN SPORTS employees meeting at FedEx Store

33. According to CI1, BARDWELL also employed five local police officers to act as his personal security detail to escort him everywhere. BARDWELL was highly paranoid of federal law enforcement and hired the police officers to protect him. The police officers would escort BARDWELL to strip clubs multiple times a week.

34. On July 9, 2026, the FBI conducted physical surveillance on BARDWELL and observed him at the Landing Strip Lounge in Romulus. Large amounts of cash were being thrown into the air from a table of BARDWELL's

known associates. BARDWELL was parked in front of the lounge in a parking spot parked as “VIP”. When BARDWELL departed the lounge, employees were heard saying “see you tomorrow” to BARDWELL. BARDWELL was escorted home by four vehicles registered to off-duty police officers.

35. CI1 was paid $2,000 a week in cash or business check. BARDWELL did not withhold taxes for his employees, nor did he provide his employees with a W2 or 1099. All the MOTOWN SPORTS employees were paid between $1,000 and $3,000 a week. BARDWELL did not keep payroll records. They were paid in cash or by check, but there was no payroll ledger, and CI did not pay taxes on any of the money. The employees were paid in stock shares as a commission for bringing in new investors.

36. Records obtained by the FBI from PicMii Crowdfunding indicate there were a total of 449 reservations of interest in the investment opportunity on the MOTOWN SPORTS crowd funding site. Of those 449 reservations, 373 were submitted by only 10 separate internet protocol (IP) addresses. One particular IP address, 124.217.105.178 accounted for 203 separate reservations accounting for $2,187,000 of interest reservations. Of these duplicate IP addresses, nine of the ten resolve to the Philippines, with one resolving to Tokelau, a territory in the South Pacific Ocean. From my training and experience, this appears to be an overseas service utilizing software programs to generate fabricated interest in MOTOWN

SPORTS. According to CI1, employees of MOTOWN SPORTS would log on to the crowdfunding site to increase the number of reservations into the project.

37. CI1 said that BARDWELL did not keep a ledger of investors or amounts received for the project. BARDWELL sent out emails with updates to the investors, and one investor replied to the group saying that he would like to see the books of the project. CI1 said that BARDWELL "freaked out because there was nothing to show."

38. CI1 said that BARDWELL put down $100,000 as a deposit on the land in Romulus where the project was to be built, but he never purchased the land. BARDWELL paid for a new appraisal every year. This past January, he put down another $100,000 deposit after he begged investors for more money.

39. BARDWELL had a group of investors that he called "legacy shareholders." In a Monthly Progress Report attached to an email obtained by the FBI sent from BARDWELL at motownfacility@yahoo.com, the report stated that MOTOWN SPORTS had 1,700 legacy shareholders. BARDWELL would tell this group that after the project was funded, he was going to kick out all the other investors and just allow the legacy shareholders to stay on the project. CI1 said that BARDWELL told the legacy shareholders that they would go to New York to finalize a bank loan for the project, but the trip never happened.

40. Bank records showed that MOTOWN SPORTS paid JLL, a global commercial real estate and investment management services company, thousands of dollars. According to CI1, JLL was brought in to identify potential investors for MOTOWN SPORTS. Victim 1 attended a meeting hosted by JLL where they brought in an investor who was supposedly interested in investing $300 million. BARDWELL told MOTOWN SPORTS shareholders that he turned down the large-scale investor because he insulted the other shareholders. This was a common tactic used by BARDWELL to turn down large investments or loans since he likely knew they would not go through once MOTOWN SPORTS financial records were reviewed.

41. CI1 said that BARDWELL made incriminating statements to the employees like, "If I go down, you're all going down with me." BARDWELL was paranoid about federal investigators and thought he was being watched, according to CI1, which was why he paid police officers to act as his personal security. CI1 described how BARDWELL would say they needed more money to pay taxes. BARDWELL would tell investors, "We just need a little bit more." CI1 said that BARDWELL once said he was "robbing Peter to pay Paul."

42. After a few months of working for MOTOWN SPORTS CI1 became concerned. There was no actual work to develop the project being done. When CI1 confronted BARDWELL, he threatened to post illicit pictures of CI1 publicly.

Expenses

43. CI1 described shopping trips in which BARDWELL would give CI and each of the other employees approximately $1,500 to purchase whatever they wanted. BARDWELL spent lavishly at high-end stores, paying in cash. BARDWELL put credit cards in other people's names and attempted to do so with CI1. BARDWELL put a credit card in the name of an acquaintance, R.R., whom he described as his "brother." R.R. incurred a lot of debt on behalf of BARDWELL. CI1said that BARDWELL went to the bank every day to withdraw just under $10,000.

44. Victim 1 stated BARDWELL always drove high-end rental vehicles to appear more affluent, which were rented by R.R. It was reported by multiple witnesses that due to BARDWELL's poor credit, he is unable to secure any lines of credit, such as credit cards, which would be required to rent a vehicle. Records obtained by the FBI from Enterprise Holdings indicated R.R. had a history of renting multiple high-end SUVs, such as Jeep Grand Wagoneers. The FBI observed BARDWELL driving a white Jeep Wagoneer registered to EAN Holdings, the primary operating and leasing subsidiary of Enterprise. According to the Enterprise records, during this time BARDWELL was witnessed driving the

vehicle, it was rented to R.R. for $490 a week. BARDWELL has been driving luxury rental vehicles routinely since at least June 2025.

45. Records provided by Zeidman's Jewelry and Loan showed BARDWELL had made at least $420,000 in purchases of Rolex watches, purses and other jewelry.

46. CI1 said that BARDWELL was well-known at the club and visited multiple times per week, spending approximately $10,000 per visit. It was not unusual for BARDWELL to leave paper cash currency wrappers which said "10,000" on the floor. CI1 said he spent $40,000 to $50,000 per week at the club, and the dancers would fight over getting to work on the nights that BARDWELL came in. BARDWELL traveled with a security detail like a celebrity.

47. During my interview with CI1, another employee of the strip club (CI2) was present. CI2 confirmed that BARDWELL spent lavishly at the club. CI2 said that BARDWELL paid the club's security guards to protect him and escort him to the freeway when he left, even though he had his own security detail. CI2 said that BARDWELL entered the club through the back door and kept his money in grocery bags. BARDWELL was also known to solicit and pay for sex from the women who worked at the strip clubs. CI2 said the dancers would call her and say they were going to be late because they were being paid to visit

BARDWELL for sex prior to their shifts. CI2 said BARDWELL convinced multiple employees of the strip club to invest in his sports arena development project. CI2 banned BARDWELL from the club for asking for loans and trying to get dancers at the club to go fully nude, which was strictly against club policy. He has since called CI2 to ask how much he could pay to be allowed back in the club.

48. The analysis of BARDWELL phone records identified those he communicated with most frequently. This analysis identified E.W. who had a very active social media presence. E.W. also known as M.W. on social media sites, has posted on Facebook about her man "K.B" since 2024. According to CI1, E.W. was a former exotic dancer that BARDWELL was supporting financially. E.W. posted several posts on her Facebook account making statements such as "KB is mines", "Ken loves Molly (Barbie)", "KB why did you pay for these braces? He just say yes to whatever I ask for", and "I just love the way KB take care of me my man my man my man". E.W. often refers to Bardwell as her "daddy" which is often an abbreviated term for sugar daddy or a wealthy person who provides financial support or expensive gifts to a younger companion. In a video posted on November 7, 2027, E.W. says "...I'm going to get a step board for my new 2025 Wrangler that daddy just bought me…". In another video E.W. posts a short video of her standing in a renovated kitchen with the caption "Daddy bought me a kitchen as big as my ego". A video posted on October 14, 2025, of E.W. closing on a real

estate transaction bears the caption "My net worth just went up half of $1 million more today let's celebrate…special thanks to my man, my man, my man.." In a video posted on August 25, 2025, a man resembling BARDWELL (pictured below), who is wearing a black MOTOWN SPORTS hooded sweatshirt with CEO printed on the sleeve, is seen pulling a large box out of a bag labeled Chanel and has the caption "Get your own daddy, he's mines…". In a post on April 4, 2026, E.W. can be seen wearing a MOTOWN SPORTS sweatshirt talking about how spoiled she is by her daddy and showing off a Cartier bag, a large stack of $100 bills with a note signed with a signature resembling BARDWELL's. Additionally, cashier's checks for thousands of dollars were made out to E.W. from Huntington National Bank account in the name of Motown Sports Group Holdings Inc. In just over a month period E.W. received $19,000 of MOTOWN SPORTS funds.

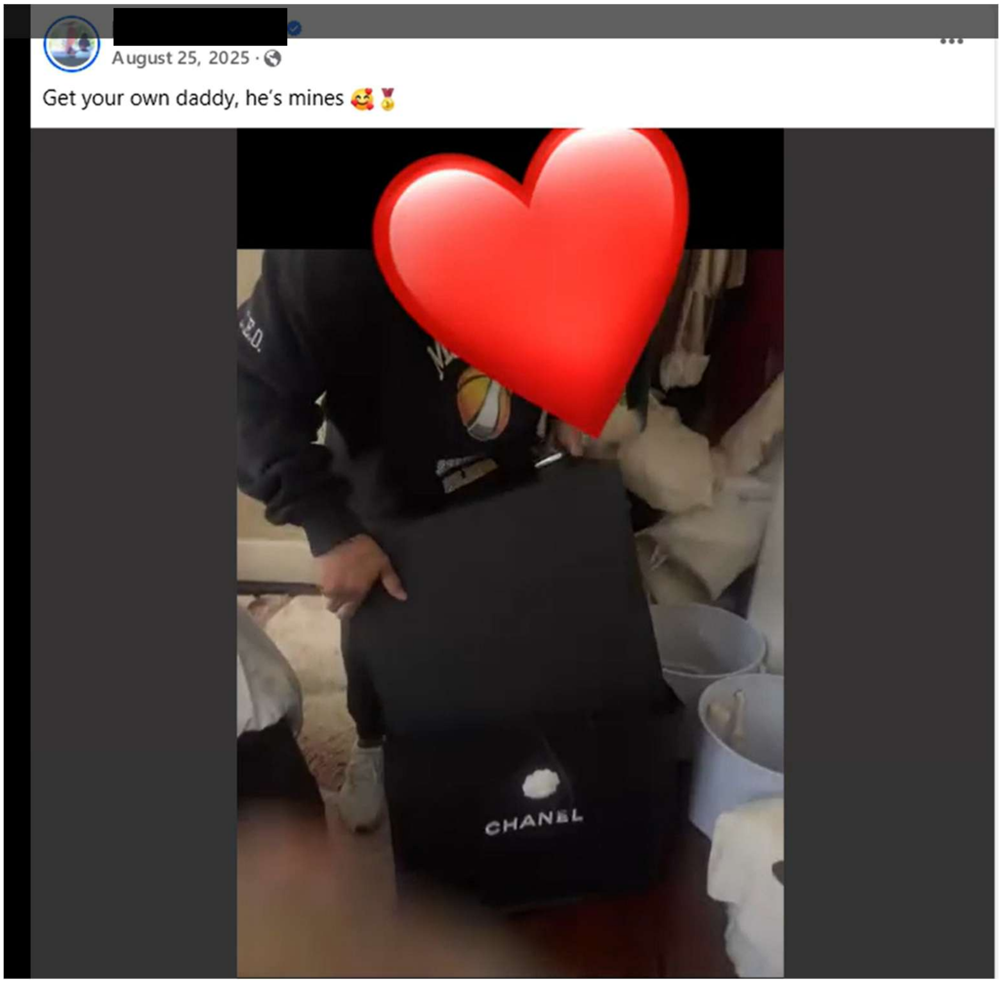

Image 3: E.W.Facebook Post

1. Bank account for MOTOWN SPORTS showed Motown Sports Real-Estate Acquisitions Land & Development, LLC, BARDWELL's wife, S.B. has benefited from this fraud scheme as well. On Huntington account 8891 in the name of Motown Sports Real Estate Acquisition, multiple cash withdrawals were made by S. B. documented in multiple withdrawal slips. Additionally, as evident in review of JP Morgan and Chase account ending in 0581, also in the name Motown Sports Real

Estate Acquisition, S. B. is listed as the sole signer on the account signature card. S.B. also endorses the investor checks with memos such as "Romulus Site Development" and "Investment" made out to MOTOWN SPORTS, which are almost the exclusive source of funding for the account. S.B. also makes cash withdrawals from business checking account JPMC x0581, many with a handwritten note on the withdrawal slips that say "Large Bills". There were also Zelle payments made directly to S.B. and cashier's checks made out in her name. According to Victim 1 and the address listed on her driver's license, S.B. resides in a separate apartment in the same complex as BARDWELL. The rent for these apartments are paid for out of MOTOWN SPORTS business bank accounts.

49. Records with Michigan's Licensing and Regulatory Affairs database show that Motown Sports Group Holding, Inc. and Motown Sports Real Estate Acquisitions & Land Development LLC are both registered to BARDWELL at 6370 Village Park Drive, Suite 205, West Bloomfield, Michigan, 48322, which is a residential apartment also listed on BARDWELL's driver's license. Motown Sports Real Estate Acquisitions & Land Development LLC's initial filing date was in November of 2019 and Motown Sports Group Holding, Inc.'s initial filing was in May of 2015.

CONCLUSION

46. Based on the forgoing, I request that the Court issue the proposed arrest warrant.

47. As described below in detail above, throughout the course of this investigation bank records and witness statements indicated that millions of dollars of incoming funds marked as "investments" to MOTOWN SPORTS accounts were not held in an escrow account as represented to investors, but in reality, were withdrawn in cash and used for personal gain by KENNETH WAYNE BARDWELL. BARDWELL perpetrated this scheme through the use of interstate bank wires, emails and websites.

48. Therefore, your affiant believes that probable cause exists that KENNETH WAYNE BARDWELL violated Title 18, U.S.C. §1343 (Wire Fraud).

Respectfully submitted,

Julia MacBeth, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.

David R. Grand
UNITED STATES MAGISTRATE JUDGE

July 14, 2026