

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION

UNITED STATES OF AMERICA    )    CASE NO: 2:21-CR-22  
  )  
v.                                        )  
  )  
TRAVIS MCMICHAEL                )

**GOVERNMENT’S NOTICE OF PLEA AGREEMENT**

NOW COMES the United States of America, by and through David H. Estes, United States Attorney for the Southern District of Georgia, Kristen Clarke, Assistant Attorney General for the Civil Rights Division, and the undersigned attorneys, and pursuant to 18 U.S.C. § 3161(h)(1)(G), notifies the Court that a Rule 11(c)(1)(C) plea agreement has been reached by the parties which, if accepted by the Court, would dispose of the charges pending in the above-captioned case against defendant Travis McMichael. A copy of the plea agreement has been provided to the Court for its consideration. The government respectfully requests that the Court schedule a Rule 11 proceeding and accept the defendant’s plea as set forth in the proposed agreement.

Respectfully submitted this 30<sup>th</sup> day of January, 2022.

KRISTEN CLARKE  
Assistant Attorney General

DAVID H. ESTES  
United States Attorney

***s/Christopher J. Perras***  
Christopher J. Perras  
Special Litigation Counsel  
Criminal Section, Civil Rights Division  
United States Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530  
Massachusetts State Bar No. 682002  
Telephone: (202) 307-6962  
Email: christopher.perras@usdoj.gov

***s/Tara M. Lyons***  
Tara M. Lyons  
Assistant United States Attorney  
United States Attorney’s Office  
Southern District of Georgia  
P.O. Box 2017  
Augusta, GA 30903  
South Carolina State Bar No. 16573  
Telephone: (706) 826-4532  
Email: tara.lyons@usdoj.gov

**s/Barbara (Bobbi) Bernstein**

Barbara (Bobbi) Bernstein

Deputy Chief

Criminal Section, Civil Rights Division

United States Department of Justice

950 Pennsylvania Avenue, NW

Washington, DC 20530

Virginia State Bar No. 38490

Telephone: (202) 353-0032

Email: bobbi.bernstein@usdoj.gov

