

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

FILED
U.S. DISTRICT COURT

2021 APR 28 P 1:39

UNITED STATES OF AMERICA)	INDICTMENT NO.
)	
v.)	18 U.S.C. § 245(b)(2)(B)
)	Interference with Rights
TRAVIS MCMICHAEL,)	
)	18 U.S.C. § 1201(a)(1) and (d)
GREGORY MCMICHAEL, and)	Attempted Kidnapping
)	
WILLIAM "RODDIE" BRYAN)	18 U.S.C. § 924(c)
)	Use of a Firearm During
)	a Crime of Violence

CLERK *[Signature]*
SO. DIST. OF GA.

THE GRAND JURY CHARGES THAT:

CR221-022

COUNT ONE
Interference with Rights
18 U.S.C. § 245(b)(2)(B) and § 2

On or about February 23, 2020, in Glynn County, in the Southern District of Georgia, defendants TRAVIS MCMICHAEL and GREGORY MCMICHAEL, while aiding and abetting one another, did willfully, by force and threat of force, injure, intimidate, and interfere with Ahmaud Arbery, an African American man, because of Arbery's race and color, and because he was and had been enjoying a facility provided and administered by a state and subdivision thereof; specifically, as Arbery was running on a public street in the Satilla Shores neighborhood of Brunswick, Georgia, TRAVIS MCMICHAEL and GREGORY MCMICHAEL armed themselves with firearms, got into a truck, and chased Arbery through the public streets of the neighborhood while yelling at Arbery, using their truck to cut off his route, and threatening him with firearms.

The offense:

- a. Included the use, attempted use, and threatened use of dangerous weapons (a truck, a .357 Magnum revolver, and a Remington shotgun);
- b. Included an attempt to kidnap, in that **TRAVIS MCMICHAEL** and **GREGORY MCMICHAEL** attempted to forcibly hold and detain Arbery against his will; and
- c. Resulted in the death of Ahmaud Arbery.

All in violation of Title 18, United States Code, Sections 245(b)(2)(B), and 2.

COUNT TWO
Interference with Rights
18 U.S.C. § 245(b)(2)(B) and § 2

On or about February 23, 2020, in Glynn County, in the Southern District of Georgia, defendant **WILLIAM “RODDIE” BRYAN**, while aiding and abetting Travis and Gregory McMichael, did willfully, by force and threat of force, injure, intimidate, and interfere with Ahmaud Arbery, an African American man, because of Arbery’s race and color, and because he was and had been enjoying a facility provided and administered by a state and subdivision thereof; specifically, as Arbery was running on a public street in the Satilla Shores neighborhood of Brunswick, Georgia, **WILLIAM “RODDIE” BRYAN** got into a truck and chased Arbery through the public streets of the neighborhood, and used his truck to cut off Arbery’s route.

The offense:

- a. Included the use, attempted use, and threatened use of a dangerous weapon (a truck); and
- b. Included an attempt to kidnap, in that **WILLIAM “RODDIE” BRYAN** attempted to forcibly hold and detain Arbery against his will.

All in violation of Title 18, United States Code, Sections 245(b)(2)(B), and 2.

COUNT THREE
Attempted Kidnapping
18 U.S.C. § 1201(a)(1), (d), and § 2

On or about February 23, 2020, in Glynn County, in the Southern District of Georgia, defendants **TRAVIS MCMICHAEL, GREGORY MCMICHAEL, and WILLIAM “RODDIE” BRYAN**, while aiding and abetting one another, did unlawfully attempt to seize and confine Ahmaud Arbery and hold him for a reward and otherwise (for a purpose and benefit), and, in committing and in furtherance of the commission of the offense, used an instrumentality of interstate commerce (a truck driven by **TRAVIS MCMICHAEL** and a truck driven by **WILLIAM “RODDIE” BRYAN**). Specifically, the three defendants chased Arbery through the neighborhood, using their trucks—and in the case of the McMichaels, firearms—in an attempt to restrain Arbery, restrict his free movement, corral and detain him against his will, and prevent his escape.

All in violation of Title 18, United States Code, Sections 1201(a)(1), (d), and 2.

COUNT FOUR

***Using, Carrying, Brandishing, and Discharging a Firearm
During and In Relation to a Crime of Violence***

18 U.S.C. § 924(c)

On or about February 23, 2020, in Glynn County, in the Southern District of Georgia, defendant **TRAVIS MCMICHAEL** knowingly used and carried a firearm (a Remington shotgun) during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the violation of § 245(b)(2)(B) charged in Count One. During and in relation to that crime of violence, the defendant brandished and discharged the firearm.

All in violation of Title 18, United States Code, Section 924(c).

COUNT FIVE

***Using, Carrying, and Brandishing a Firearm
During and In Relation to a Crime of Violence
18 U.S.C. § 924(c)***

On or about February 23, 2020, in Glynn County, in the Southern District of Georgia, defendant **GREGORY MCMICHAEL** knowingly used and carried a firearm (a .357 Magnum revolver) during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the violation of § 245(b)(2)(B) charged in Count One. During and in relation to that crime of violence, the defendant brandished the firearm.

All in violation of Title 18, United States Code, Section 924(c).

FORFEITURE ALLEGATIONS

The allegations contained in Counts Three through Five of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 924(d), 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

Upon conviction of the Title 18 offense set forth in Count Three of this Indictment, defendants **TRAVIS MCMICHAEL, GREGORY MCMICHAEL, and WILLIAM "RODDIE" BRYAN** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and 28, United States Code, Section 2461, any property, real or personal, that constitutes or is derived from proceeds traceable to the offense.

Additionally, upon conviction of the Title 18 offenses set forth in Counts Four and Five of this Indictment, defendants **TRAVIS MCMICHAEL and GREGORY MCMICHAEL** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense.

(Signatures on following page)

A TRUE BILL

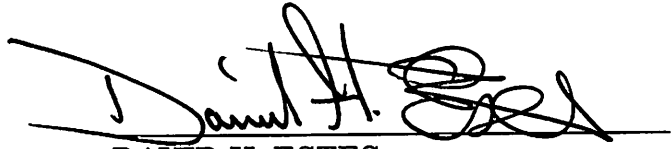
PAMELA S. KARLAN
Principal Deputy Asst. Attorney General



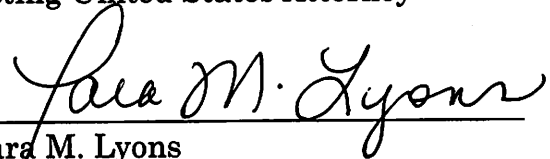
Christopher J. Perras
Special Litigation Counsel
Criminal Section, Civil Rights Division
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530
Massachusetts State Bar No. 682002
Telephone: (202) 307-6962
Email: christopher.perras@usdoj.gov



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



DAVID H. ESTES
Acting United States Attorney



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