

Randall M Adams
CLERK SUPERIOR COURT

**IN THE SUPERIOR COURT OF GLYNN COUNTY
STATE OF GEORGIA**

STATE OF GEORGIA,)
)
)
) **INDICTMENT NO.**
v.)
) **CR-200043**
TRAVIS MCMICHAEL,)
)
)
 Defendant.)

MOTION FOR BOND

COMES NOW the Defendant, Travis McMichael, by and through undersigned counsel, and moves this court for a reasonable bond and shows the following:

(1)

Travis McMichael was arrested on May 7, 2020 and charged with felony murder and aggravated assault. The State indicted Travis on June 24, 2020 in the above-styled case, and added additional charges for the same conduct. He is now indicted for one count of malice murder, four counts of felony murder, two counts of aggravated assault, one count of false imprisonment, and one count of attempted false imprisonment.

(2)

Travis is an excellent candidate for a low bond in that he meets all of the criteria set forth in O.C.G.A. § 17-6-1(e): He poses no significant risk of fleeing from the jurisdiction of the court; he poses no significant threat or danger to any person or property in the community; he poses no significant risk of committing any felony pending trial; and he poses no significant risk of intimidating witnesses.

(3)

FAMILY BACKGROUND

Travis McMichael is 34 years old, and has never been charged with any crime in his life until arrested in this case.

He has lived all of his life in the Brunswick area.¹ Travis's maternal grandfather, Jesse Hunt served in France and Germany in World War II, including landing in the second wave at Normandy. After his discharge, he went to medical school, and moved to Brunswick where he opened a general medical practice. While practicing medicine in Brunswick, he learned that lower income residents of Sapelo Island did not have medical care on the island, so he opened a small clinic there as well. He died in 1996 when Travis was 10 years old and was a major influence in Travis's life.

¹ Travis lived in other locations during his career in the United States Coast Guard, discussed more fully below.

Travis grew up in the River Ridge subdivision of Brunswick, and his parents, Greg and Leigh McMichael, have been married for 37 years. His mother, Leigh, was a hospice nurse at Hospice of the Golden Isles for 10 years. Currently, she is a utilization review supervisor at Southeast Georgia Health Systems, Brunswick Campus. His sister, Lindsey, is in school at Coastal College of Georgia and is scheduled to graduate in 2021 where she is majoring in psychology. He was living with his parents and sister at the time of his arrest.

Travis McMichael was in a relationship with Nicole Joyner of Jacksonville, Florida, and they have one child, Everett, age 3. Travis has joint legal and physical custody of Everett, and Everett was living with him every other week until Travis's arrest. Everett has not seen his father since May 7th. According to Ms. Joyner, Travis is an extremely devoted father who dotes on Everett, and has been instrumental in teaching Everett manners, respect, and a love for the outdoors. Attached as **Exhibit A** are photographs of Travis and Everett doing father/son activities.

Travis's family, and particularly Everett, is his life and he would never flee the jurisdiction of this court for fear of never seeing his family again.

SCHOOL AND EMPLOYMENT

Travis is a 2004 graduate of Brunswick High School, where he was involved

with Future Farmers of America. While in high school, he worked as a lifeguard at Camp Courage in 2003.² Even as a teenager, Travis showed courage and skill when he jumped into the Camp Courage pool and saved a young boy who had sunk to the bottom, even with all the other counselors around. In the letter attached as **Exhibit B**, the camp director expressed his gratitude to young Travis for showing grace under pressure and saving that child.

After graduating from high school in 2004, Travis worked for John Hellin at Riverside Drywall until 2007.

In 2007 Travis McMichael enlisted in the United States Coast Guard. His career in the Coast Guard shows Travis to be a man who obeys orders, shows up when he is supposed to show up, and is not a danger to any community, critical factors in the Court's decision of whether to grant bond.

After boot camp, Travis was stationed in Alameda, California where he was assigned to the cutter *Sherman*, a drug interdiction assignment. Travis's work took him from California to Central America. His role was primarily search and rescue and law enforcement.

In 2008, he went to school in Yorktown, Virginia and became a machinery technician. He was promoted to Petty Officer 3rd Class and was stationed at Coast

² Camp Courage is a camp for children who lost close family members.

Guard Station-Pascagoula for four years. Attached as **Exhibit C** is his certificate awarding Travis his promotion to Machinery Technician Third Class. His jobs at Pascagoula Station included machine repair, search and rescue, and law enforcement.

Travis's roommates while living in Pascagoula were Kyle Meissner and Curt Hall. Sgt. Hall is multi-racial and currently a sergeant in the United States Marine Corps. He has provided a handwritten letter in support of Travis's Motion for Bond in which he describes Travis as a mentor – someone who was professional, well-mannered, and respectful of others. He states that Travis is not someone who would go looking for trouble or mistreat people while out on bond. Hall's letter is attached as **Exhibit D**.

In 2012, Travis received a Letter Of Commendation from the Commandant, Captain D.J. Rose. Attached as **Exhibit E** is the letter in which Captain Rose states that Travis exhibited **superior dedication and commitment, exceptional skills, superior management and execution, and a selfless devotion to duty and consideration for others.**

In 2012, he was transferred to Station Mayport in Jacksonville, Florida where he stayed until being honorably discharged in 2016. Attached as **Exhibit F** is a photo of Travis standing next to his ship at Station Mayport. In 2014, Travis

assisted in rescuing Lawrence and Susan Nelson after their 48-foot boat began taking on water and sank at the St. Johns River South Jetty. In high seas and winds, Travis heroically plucked the Nelsons from the seas in the dark night and with reduced visibility. For that act of heroism, Travis received a commendation from his commanding officer and more importantly, a thank you card from Miles and Zoe Nelson, thanking Travis for saving their grandparents. Attached as **Exhibit G** are the thank you cards, memorandum from Capt. Allan, and the *Florida Times Union* article about the rescue.

Over the course of his Coast Guard service, Travis took classes and became certified in refrigeration and air conditioning, rigging, hydraulics, drug lab identification, OSHA industrial safety standards, forklift and weight handling, boarding passenger vessels, and CPR and first aid. Attached as **Exhibit H** are his certificates of completion of these courses. He even attended the Federal Law Enforcement Training Center in Charleston, SC where he passed classes relating to vessel searches, criminal investigations, arrest powers, and protecting self and others from hostile threats. Travis's Coast Guard transcript is attached as **Exhibit I**.

In 2016, Travis received the "Good Conduct Award" for "adherence to our core values of Honor, Respect and Devotion to Duty." It was his third award.

Attached as **Exhibit J** is his award. He also received a Letter of Commendation for his overall excellent work at the Mayport Station from 2012-2016. Specifically pointed out by Captain J.R. Dixon in the letter is an incident in December 2013 where Travis, with his “quick-thinking and application of sound judgment and a strong bias for action, ... saved the crew of F/V Carolina Three.” The letter is attached as **Exhibit K**.

Overall, Travis received the unit commendation ribbon, the pistol marksman ribbon, the meritorious team ribbon a letter of commendation ribbon, the national defense service medal and three good conduct medals.

In 2018, Travis moved back home with his parents when his rental property was sold. He worked for a while for Woodrow Sapp, and in 2018 began work for Metson Marine, a Navy defense contractor. Travis’s job, for which he had a security clearance, involved harbor operations at Kings Bay Naval Base. He was working for Metson at the time of his arrest.

The above recitation of Travis’s family and employment background depict a person who is dedicated, trustworthy, selfless, and reliable. These characteristics exemplify the type of person most worthy of a reasonable bond in a case like this.

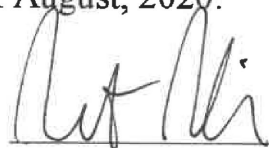
(4)

The charges against Mr. McMichael are serious, as the state will point out,

however, Mr. McMichael is presumed innocent of the charges, and is invested in fighting the charges, and having his day in court. There is no risk that Mr. McMichael will fail to appear in Court – he does not have a passport, and most importantly, his family, including his parents and three-year-old son are here in Georgia. If past history is indicative of future behavior, there is absolutely no evidence that Travis McMichael will commit crimes or pose a danger to the community or witnesses while he awaits trial.

WHEREFORE, Travis McMichael prays that this Court grant him a reasonable bond. In addition, Travis McMichael waives the requirement of an evidentiary hearing within ten days of the filing of this motion.

Respectfully submitted this 6th day of August, 2020.



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CERTIFICATE OF SERVICE

This is to certify that I have this date served the within and foregoing Motion for Bond upon the parties to this matter via Odyssey e-file upon:

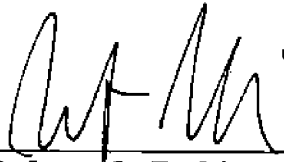
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This 6th day of August, 2020.

Respectfully submitted,



Robert G. Rubin
Attorney for Travis McMichael
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A handwritten signature in black ink, appearing to read 'J.B. Sheffield', is written over a horizontal line.

Jason B. Sheffield
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