

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>Crim. No. 17-232 (EGS)</b>
	:	
<b>MICHAEL T. FLYNN,</b>	:	
	:	
	:	<b>Sentencing: December 18, 2018</b>
<b>Defendant.</b>	:	

**GOVERNMENT’S MOTION FOR DOWNWARD DEPARTURE**

The United States of America, by and through Special Counsel Robert S. Mueller, III, respectfully moves for a downward departure pursuant to Section 5K1.1 of the United States Sentencing Guidelines to reflect the defendant’s substantial assistance to the government. In support of this motion, the government has contemporaneously filed, under partial seal, an Addendum to the Government’s Memorandum in Aid of Sentencing. For the

reasons stated therein, the Court should grant the government's motion for a downward departure.

Respectfully submitted,

ROBERT S. MUELLER, III  
Special Counsel

By: \_\_\_\_\_ /s/

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**CERTIFICATE OF SERVICE**

I, Brandon L. Van Grack, certify that I caused to be served a copy of the foregoing by electronic means on counsel of record for defendant Michael T. Flynn on December 4, 2018.

\_\_\_\_\_/s/\_\_\_\_\_  
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