

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

LANDON BRYCE MITCHELL,

Defendant.

Crim. Action No. 1:21CR508-02

**MR. MITCHELL'S MOTION TO APPEAR BY VIDEO-TELECONFERENCE  
AT THE PRE-TRIAL RELEASE VIOLATION HEARING**

Landon Mitchell, through undersigned counsel, hereby moves this Court to permit him to appear by video-teleconference at the pre-trial release violation hearing that was scheduled today for Friday, January 24, 2023. Due to the short notice and Mr. Mitchell's indigent status, he cannot afford to purchase a ticket to travel to this district from Houston by January 27, 2023. In support of this Motion, counsel states:

1. Mr. Mitchell has previously been determined to be financially unable to obtain retained counsel and to qualify for court appointed counsel. Accordingly, the Office of the Federal Public Defender has been appointed to represent Mr. Mitchell.
2. Mr. Mitchell has since never failed to appear to any court date. On November 8, 2022, Mr. Mitchell appeared via video-teleconference for a hearing regarding pretrial release. On December 1, 2022, he flew to the district in order to attend the stipulated trial, originally scheduled on December 2, 2022. After he arrived in the district, the stipulated trial was continued to December 7, 2022. Mr.

Mitchell then changed his flight and remained in the district so that he could attend the stipulated trial. Mr. Mitchell cleaned out his bank account for these tickets. He has no cash, savings, or credit card with which to purchase a ticket to arrive in the district by January 27, 2023.

3. As this Court is aware, Mr. Mitchell was recently detained pursuant to a state court drug charge in Montgomery County, Texas. On January 23, 2023, that case was dismissed and Mr. Mitchell was released from custody. While he was detained, he lost his hourly-wage job and earned no income.
4. Mr. Mitchell contacted his pre-trial services officer as soon as he was released from custody.
5. On January 24, 2023, the Court scheduled a violation hearing for January 27, 2023, at 9:30 a.m. Mr. Mitchell is aware of the hearing. As soon as counsel notified him of the hearing, he attempted to make arrangements to travel to the district. Unfortunately, however, Mr. Mitchell cannot afford to travel to the district on such short notice. As such, he respectfully moves the Court to permit him to appear by video-teleconference.
6. Alternatively, Mr. Mitchell asks the Court to order the United States Marshal to make one-way transportation arrangements to bring Mr. Mitchell from his home in Texas to the District of Columbia for the hearing on January 27, 2023 pursuant to 18 U.S.C. § 4285. To the extent the Court is concerned that Mr. Mitchell was able to afford to travel to the District of Columbia on January 6,

2021, Mr. Mitchell lived in northern Virginia at the time and did not have to purchase a plane ticket.

Wherefore the reasons herein and any others that appear to the Court, Mr. Mitchell, through counsel, respectfully moves the Court to permit him to appear at his January 27 violation hearing by video-conference or require the United States Marshal to arrange for transportation. Counsel contacted the government prior to filing this motion and the government takes no position.

Respectfully Submitted,

A. J. KRAMER  
FEDERAL PUBLIC DEFENDER

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/s/  
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