

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

LANDON BRYCE MITCHELL,

Defendant.

Crim. Action No. 21-508-02 (BAH)

**SUPPLEMENT TO MEMORANDUM IN AID OF SENTENCING**

Landon Mitchell will be before the Court for sentencing on April 20, 2023, having accepted full responsibility for his conduct at the U.S. Capitol on January 6, 2021. As the Court is aware, after counsel submitted sentencing memoranda, the sentencing hearing was continued due to scheduling issues. Therefore, counsel respectfully submit this brief supplement to update the Court as to Mr. Mitchell's compliance with strict conditions of home confinement.

On January 25, 2023, following Mr. Mitchell's admitted use of methamphetamines, this Court placed Mr. Mitchell on "strict-24-hour-a-day lock-down" at his brother's home in Texas. Mr. Mitchell was expressly from leaving the home for work or any purpose, aside from medical emergencies. Minute Order, January 25, 2023. On February 28, 2023, the sentencing date in this matter was continued from March 6, 2023, to April 20, 2023, extending the period of home incarceration by over one month. On March 7, 2023, the Court granted Mr. Mitchell's

request to modify his conditions of release and permit him to go outside for 20 minutes per day. Minute Order, March 7, 2023.

Mr. Mitchell has been in perfect compliance with home incarceration for three months. Moreover, he has used the past three months to reflect on his life, to get sober, and to deepen his connection his mother and brother, who will serve as his primary support system going forward. Mr. Mitchell has experienced significant adversity in his life, as set forth in his Memorandum in Aid of Sentencing, ECF. No. 117. And he has admitted that he struggles with substance abuse disorder. It is a testament to his resolve to change that Mr. Mitchell has used the past three months productively and has been able to comply with the strict terms of home incarceration.

It has now been over two years since Mr. Mitchell entered the Capitol on January 6, 2021. During the past two years, he has moved back to Texas to live with this family and has confronted his drug addiction. Though he was wrong to enter the building, he was never violent or threatening and when officers told him to leave, he complied. For all of the reasons set forth in counsel's Memorandum in Aid of Sentencing and Mr. Mitchell's extended compliance with home incarceration, counsel respectfully submit that a sentence well below the guideline range is sufficient but not greater than necessary.

Respectfully Submitted,

A. J. KRAMER  
FEDERAL PUBLIC DEFENDER

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