

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

UNITED STATES OF AMERICA

v.

LANDON MITCHELL,

Defendant.

Crim. Action No. 21-508(BAH)

MR. MITCHELL'S MOTION TO MODIFY CONDITIONS OF RELEASE

Undersigned counsel respectfully moves this Court to enter an Order modifying conditions of pre-trial release so that Mr. Mitchell can go to his grandmother's home for one day to assist her with home maintenance and yard work. Mr. Mitchell is currently on home incarceration at his brother's residence until his self-surrender date in early November. Mr. Mitchell is currently supervised in Texas and on electronic monitoring.

Mr. Mitchell's grandmother needs assistance filling in a large ditch in her yard that was created to repair sewage and electrical piping and wiring for her home. Mr. Mitchell's grandmother lives near his brother's residence where Mr. Mitchell currently resides. Mr. Mitchell will coordinate with his pretrial officer regarding the date and time he goes to assist his grandmother. He anticipates the work will take between six and seven hours. He will only go to his grandmother's home and return directly to his brother's residence.

In support of this motion, counsel states:

1. Mr. Mitchell accepted responsibility to, *inter alia*, obstruction of justice and this Court sentenced Mr. Mitchell on April 20, 2023.
2. Prior to sentencing, Mr. Mitchell was on home incarceration for three months at his brother's residence.
3. The Court permitted Mr. Mitchell to self-surrender.
4. Mr. Mitchell went to Virginia immediately after his sentencing in this case to resolve a pending matter there. The Virginia court sentenced Mr. Mitchell to 8 months incarceration and took him into custody.
5. Mr. Mitchell completed that sentence in late September 2023. Mr. Mitchell immediately contacted counsel and the Probation Office to determine next steps for his self-surrender in this case.
6. Mr. Mitchell returned home to Texas and continued to reside with his brother. Mr. Mitchell immediately reached out to his pretrial officer in Texas and the pretrial officer reinstalled a GPS device.
7. Mr. Mitchell received his letter regarding his BOP self-surrender date and will self-surrender as required in early November.
8. Counsel for Mr. Mitchell reached out to government counsel, but did not receive a response prior to filing this motion. Counsel did not want to delay in filing this request.

Wherefore, for the foregoing reasons, Mr. Mitchell moves this Court to enter the attached Order permitting him to go to his grandmother's home to assist her with repairs and yard work.

Respectfully Submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

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