

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

LONDON BRYCE MITCHELL,

Defendant.

Crim. Action No. 1:21CR508-02

**MR. MITCHELL'S MOTION FOR PAYMENT OF TRAVEL EXPENSES  
PURSUANT TO 18 U.S.C. § 4285**

Landon Mitchell, through undersigned counsel, hereby moves this Court to enter the attached Order, which will authorize and direct the United States Marshal to make transportation arrangements designed to bring Mr. Mitchell from his home outside Houston, Texas to the District of Columbia for the rescheduled stipulated bench trial<sup>1</sup> and to return him at the conclusion of the hearing.<sup>2</sup>

Mr. Mitchell has previously been determined to be financially unable to obtain retained counsel and to qualify for court appointed counsel. Pursuant to 18 U.S.C. § 4285, this Court may:

direct the United States marshal to arrange for that person's means of noncustodial transportation or furnish the fare for such transportation to the place where his appearance is required, and in addition may direct the United States marshal to furnish that person with an amount of money for subsistence expenses to his destination, not to exceed the amount authorized as a per

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<sup>1</sup> It is Mr. Mitchell's understanding that the rescheduled stipulated bench trial will either be on December 7, 2022 at 10:00 a.m. or December 14, 2022 at 10:00 a.m.

<sup>2</sup> Counsel for the government indicated that they oppose this motion.

diem allowance for travel under section 5702(a) of title 5,  
United States Code.

18 U.S.C. § 4285.

Mr. Mitchell purchased the ticket to attend the stipulated trial as scheduled on December 2, 2022. In order to pay for that ticket, which cost approximately \$450, and one night in a hotel, Mr. Mitchell was forced to empty his bank account, leaving approximately \$20 remaining as a balance to cover food. Mr. Mitchell's return flight is not until Sunday, December 4<sup>th</sup>, because the cost of the ticket was otherwise unaffordable. Additionally, Mr. Mitchell is staying in a hypothermia shelter in Virginia from today until his planned return to Texas on Sunday because he cannot afford more than one night at a hotel and he prioritized the night before his appearance at court.<sup>3</sup>

Mr. Mitchell completely understands that the rescheduling of his hearing was unexpected and unavoidable, but he simply does not have the money to pay for a second ticket. Additionally, as an hourly employee, every day he is away from work he loses wages. So the days he was in D.C. this week for the rescheduled hearing are lost wages he cannot get back. 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. He has since moved back to Texas.

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<sup>3</sup> Mr. Mitchell, like many people, does not have a credit card and, therefore, cannot purchase the ticket or a hotel on credit to pay back later.

Accordingly, Mr. Mitchell respectfully requests that the Court enter the attached Order directing the Marshal to make appropriate arrangements to facilitate Mr. Mitchell's appearance before the court for the stipulated bench trial on and his return to Houston, Texas after his appearance.

Respectfully Submitted,

A. J. KRAMER  
FEDERAL PUBLIC DEFENDER

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