

NOTICE OF MOTION AND MOTION  
FOR CHANGE OF VENUE

FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING  
2014 JUN 16 PM 2:44  
STEPHAN HARRIS, CLERK  
CHEYENNE

#2:14-CR-00027-NDF-2 ("SEALED") [sic]

Margin  
Notes:  
"USDC/DWY"

TO: Office of Presiding Judge  
U.S. District Court  
2120 Capitol Avenue, 2<sup>nd</sup> Floor  
Cheyenne 82001  
Wyoming, USA

28 USC 1345

Comes now the United States ex rel.  
Paul Andrew Mitchell, B.A., M.S., Citizen  
of Washington State and Private  
Attorney General, to move this

18 USC 1964

"WDWA"

FRCrP  
Rule 15

"DWY"

honorable Court for a proper change  
of venue to the Western District of  
Washington at Seattle, pursuant to  
Rule 15 of the Federal Rules of Criminal  
Procedure. Venue is not proper in  
the District of Wyoming for the following  
well established reasons:

28 USC 544

5 USC 3331

3332, 3333

-1 of 3-

- (1) Relator has repeatedly raised the issue  
of venue at several hearings, beginning  
1/28/2014 e.g. identity hearing;
- (2) no rebuttals have been forthcoming  
from any authorized personnel of the  
United States; see 28 U.S.C. 544, 5 U.S.C. 3331-3333;

- 2 of 3 -

(3) Relator has stated verbally, and in writing, that he did not step one foot anywhere in Wyoming between a college ski trip to Jackson Hole in December 1968, and the false arrest on 1/28/2014;

(4) no evidence contradicting the latter statements has been forthcoming from any authorized personnel of the United States; see 28 U.S.C. 1345, 1346;

28 USC 1345, 1346

(5) the forty-two (42) discrete moves Relator has had to endure, at the hands of the U.S. Marshal Service, appear to be motivated by a specific intent to separate Relator from his Seattle apartment and the extensive legal and patent research Relator had accumulated there, chiefly to assist Relator's private clients; and,

"USMS"

(6) said 42 moves also appear to be motivated by criminal intents to inflict cruel and unusual summary punishment on Relator, also in connection with defamation per se of Relator by libeling Relator as an "Extremist Montana Freeman Associate" [sic] e.g. in booking records.

18 USC 1513  
8<sup>th</sup> Amend.

- 2 of 3 -

- 2 of 3 -

- 3 of 3 -

"WDWA"

Venue is proper in the Western District of Washington, at Seattle, for the following well established reasons:

- (7) Relator lived and worked in Seattle, and nowhere else, between his arrival there on 6/18/2009, and the false arrest on 1/28/2014, ~ 4 1/2 years;
- (8) during the latter period, Relator did not travel outside the State of Washington; <sup>and</sup>
- (9) one of Relator's five (5) meetings with a Deputy U.S. Marshal occurred in Relator's private Seattle apartment; as such, said Deputy was an eyewitness to the residential situs of Relator's consulting practices, performed under 18 U.S.C. 1964.

"USMS"

as such, said Deputy was an eyewitness to the residential situs of Relator's consulting practices, performed under 18 U.S.C. 1964.

18 USC 1964

REMEDY REQUESTED

In light of all the above, this Court should ORDER a routine change of venue from the District of Wyoming to the Western District of Washington at Seattle, pursuant to FRCP Rule 18, and to honor Relator's fundamental Rights.

"DWY"

"WDWA"

Rule 18; FRCP

Respectfully submitted, All Rights Reserved, Paul Andrew Mitchem, B.A., M.S. (chosen name)

28 USC 1654

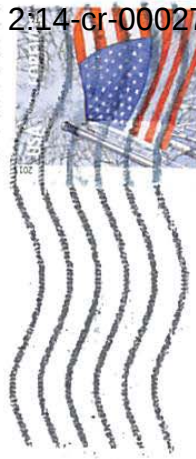
- 3 of 3 -

Relator In Propria Persona, 28 U.S.C. 1654; Private Attorney General, 18 U.S.C. 1964

- 3 of 3 -

MODELESKI, M.P. (given name)  
# 45396  
S.B.C.D.C.  
P.O. Box 130  
Gering, Nebraska  
69341-0130

NORTH PLATTE NE 691  
13 JUN 2014 PM 1 L



LEGAL MAIL

TO: Clerk of Court, Office of  
U.S. District Court  
2120 Capitol Ave., 2<sup>nd</sup> Floor  
Cheyenne 82001  
Wyoming, USA

Re:  
#2:14-CR-00027-NDF-2

All Rights Reserved  
C.F. UCC 1-308

82001

8200139633



Scotts Bluff County Detention Center  
Disclaims Any Responsibility For  
The Nature of the Content of  
This Correspondence  
Administrator

.....