# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES	OF AMERICA	:	
		:	
<b>V.</b>		:	C
		:	
ALEX HARKRIDE	ER,	:	
		:	
Defendant.	Defendant.	:	

Criminal No. 21-cr-117

# UNITED STATES OF AMERICA'S AND DEFENDANT'S JOINT NOTICE TO COURT

The United States of America and Defendant Alex Harkrider hereby provide notice to the Court of the requested information for the hearing on April 26<sup>th</sup>, 2021.

The United States of America intends to proceed by proffer and rely on the following evidence:

- Transcripts and exhibits from the Preliminary and Detention Hearing on January 22, 2021 in the Eastern District of Texas;
- 2. Select clips from a full-length video, titled FULL FOOTAGE\_ Patriots STORM U.S. Capitol (4K60fps).mp4.; and
- 3. Two messages from Defendant Harkrider's Facebook account.

The United States of America will have FBI Task Force Officer Gregory Harry present but does not intend to call him as a witness.<sup>1</sup>

The Defendant intends to call the following witnesses:

1. Donna Cox

<sup>&</sup>lt;sup>1</sup> Defendant has requested the presence of FBI Task Force Officer Gregory Harry, so while the government does not intend to present him as a witness, the Government has agreed to make him available.

#### 2. John Anderson

Counsel for the Defendant has been in trial this week and seeks permission to supplement this filing with any additional witnesses or exhibits defense counsel intends to rely on by Sunday, April 25, 2021.

Respectfully submitted,

CHANNING D. PHILLIPS ACTING UNITED STATES ATTORNEY D.C. Bar No. 415793

### /s/Brittany Keil

BRITTANY KEIL Assistant United States Attorney D.C. Bar No. 500054 U.S. Attorney's Office 555 4th Street NW, Room 11-824D Washington, D.C. 20530 202-252-7763 Brittany.Keil@usdoj.gov

/s/ Danielle Rosborough

DANIELLE ROSBOROUGH D.C. Bar No. 1016234 Trial Attorney, National Security Division United States Department of Justice 950 Pennsylvania Avenue NW Washington, D.C. 20004 202-514-0073 Danielle.Rosborough@usdoj.gov

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing joint motion has been served upon defense counsel, Kira West, by email and ECF/PACER notification, on this day, April 23, 2021.

<u>/s/ Brittany Keil</u> BRITTANY KEIL Assistant United States Attorney