

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :
 :
 v. : CRIMINAL NO. 21-CR-117 (TFH)
 :
 :
 ALEX HARKRIDER :

DEFENDANT’S MOTION TO MODIFY BOND CONDITIONS

Mr. Alex Harkrider, through his attorney, Kira Anne West, respectfully requests that this Honorable Court modify his conditions of release. Specifically, Mr. Harkrider asks the Court to remove the condition of electronic location monitoring. On April 26, 2021, after lengthy argument, this Court released the defendant with very strict conditions of release. Since his release, he has been on house arrest with location ankle monitoring. This monitoring costs Mr. Harkrider \$110 each month. Mr. Harkrider lives on a small pension from the Government which he receives for his total disability from his time serving overseas with the Marines. This is a financial, emotional and physical hardship for Mr. Harkrider.

Argument

This Court may recall that in the pleadings filed by Mr. Harkrider more than two months ago for his release of detention, undersigned counsel argued that “Mr. Harkrider is not a man prone to violence and is not a danger to the community as is

evidenced by the BWC footage, his behavior before, during and after his arrest, and the proffered testimony at the detention hearing.” This Court expressed concern that Mr. Harkrider would not follow this Court’s orders laid out in the release paperwork. Now, nearly two months later, this Court should no longer have any reservations about Mr. Harkrider’s ability to follow the orders of the Court or any other government agency. Mr. Harkrider has a perfect record of compliance with Pretrial. *See*, Dkt. #38, Pretrial report from June 11, 2021. Just as Mr. Harkrider previously cooperated with the FBI when they arrested him at his home, since his release he has been completely compliant with his Pretrial Officer, Luke Salcedo. In fact, Mr. Salcedo has urged undersigned counsel to file this motion asking for a release from electronic monitoring. Mr. Salcedo has visited Mr. Harkrider in his home and found Mr. Harkrider completely compliant. Specifically, Mr. Salcedo indicates that Mr. Harkrider is an ideal candidate for volunteer work in his community. Mr. Harkrider is willing to volunteer anywhere in his Carthage, Texas community. Mr. Harkrider has a long history of successful volunteerism in his community.

According to Mr. Salcedo, he can effectively supervise, monitor and report compliance on Mr. Harkrider just as effectively without the electronic location monitoring. This can be done by telephone contacts, email, text and continued home visits. Mr. Salcedo is available for testimony and questioning by the Court.

Conclusion

Mr. Harkrider can effectively be monitored by Pretrial Services without electronic monitoring. There is no threat to the community posed by Mr. Harkrider which is evidenced by his perfect record of compliance since his release. The combination of conditions that were ordered when Mr. Harkrider was initially released, without the electronic monitoring, would assure this Court of the safety of the community and his presence at trial.

Respectfully submitted,

KIRA ANNE WEST

By: _____ /s/
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CERTIFICATE OF SERVICE

I hereby certify on the 23rd day of June, 2021, a copy of same was delivered to the parties of record, by email pursuant to the Covid standing order and the rules of the Clerk of Court.

_____/S/
Kira Anne West