

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 UNOPPOSED MOTION TO TEMPORARILY MODIFY BOND  
CONDITIONS TO ALLOW VOLUNTEER WORK FOR HURRICANE IDA RELIEF**

Mr. Alex Harkrider, through his attorney, Kira Anne West, respectfully requests that this Honorable Court temporarily modify his conditions of release. Specifically, Mr. Harkrider asks the Court to allow him to volunteer with the Cajun Army to provide emergency hurricane relief in Louisiana along the Gulf Coast for at least a week, and possibly longer. He would be supervised by Cajun Army leader Katie Pechon of Mandeville, Louisiana. Mandeville, Louisiana is across the causeway and north of Ponchatrain Lake in New Orleans, Louisiana.

Argument

As previously presented by the defense, Mr. Harkrider has a long history of volunteerism, specifically with hurricane rescues which he did for several years prior to his arrest in this case. Since his last hearing on July 30, 2021, wherein this Court granted his motion to remove electronic monitoring, Mr. Harkrider has

volunteered by selling tickets, making t-shirts, and working at a fundraiser in his community for a fellow marine who has cancer. Mr. Harkrider has a long history of successful volunteerism in his community.

The current situation in New Orleans is that it is completely without power, and much catastrophic damage, including load imbalance to the transmission in generation. This is catastrophic grid failure. It will take days to determine the extent of the damage to the power grid in metro New Orleans. *See*

[https://www.nola.com/news/hurricane/article\\_dd8af4fe-095c-11ec-95eb-c70a067c2932.html?utm\\_medium=social&utm\\_source=email&utm\\_campaign=user-share](https://www.nola.com/news/hurricane/article_dd8af4fe-095c-11ec-95eb-c70a067c2932.html?utm_medium=social&utm_source=email&utm_campaign=user-share).

Undersigned counsel contacted pretrial services on August 29, 2021, who advised that undersigned counsel would need to file a motion. Pretrial services “defers to the Court and the government” but Ms. Holman, the pretrial officer assigned to his case has “reviewed their website..[and] appears they do good work.” Undersigned counsel has also contacted AUSA’s assigned to this case and indicate that the United States is not opposed to this motion as they spoke to pretrial officer Holman who indicated she is not opposed to the motion. As previously argued, Mr. Harkrider can continue to be supervised by telephone contacts, email, text and any other condition this Court deems appropriate.

### Conclusion

Mr. Harkrider can effectively be monitored by Pretrial Services for this volunteer effort. There is no threat to the community posed by Mr. Harkrider which is evidenced by his cooperation with law enforcement authorities and perfect record of compliance since his release. The combination of conditions currently in place 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 30th day of August, 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

**UNITED STATES DISTRICT COURT  
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 v. : **Criminal No. 21-cr-117(TFH)**  
 :  
 **ALEX HARKRIDER,** :  
 **Defendant.** :

**ORDER**

Pending before the Court is the unopposed motion to temporarily modify conditions of release by the defendant to allow him to volunteer with the Cajun Army with hurricane relief due to destruction of Hurricane Ida. Finding the motion is meritorious, it is

**ORDERED** that the motion to temporarily modify conditions of release is  
GRANTED/DENIED.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

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THOMAS F. HOGAN  
UNITED STATES DISTRICT JUDGE