

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 EXTEND TEMPORARY
MODIFICATION OF BOND CONDITIONS TO ALLOW CONTINUED VOLUNTEER
WORK FOR HURRICANE IDA RELIEF**

Mr. Alex Harkrider, through his attorney, Kira Anne West, respectfully requests that this Honorable Court extend for two weeks the temporary modification of his conditions of release that this Court granted on August 31, 2021. Specifically, Mr. Harkrider asks the Court to allow him to volunteer with the Cajun Army for an additional two weeks to provide emergency hurricane relief in Louisiana along the Gulf Coast. He would continue to be supervised by Cajun Army leader Katie Pechon of Mandeville, Louisiana. In addition, he would be supervised by the leader of the Cajun Army, Chris King, who personally requested that Mr. Harkrider continue to serve the Gulf Coast Community.

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 the last hearing, Mr. Harkrider has been an essential member of the Cajun Army team and has rescued many people, cut down numerous trees which presented a hazard, feed countless meals to the homeless and been a critical leader in using both his boat and his chainsaw. As previously noted, Mr. Harkrider has a long history of successful volunteerism in his community.

The current situation in New Orleans is that more than 100, 000 people are without power. Many people are still in shelters and drinking water is hard to find.

Undersigned counsel contacted pretrial services officer Shay Holman on September 9, 2021, via email and received an out of office memo until September 13, 2021. In the last hearing her statement was that she “defers to the Court and the government.” Undersigned counsel has also contacted AUSA Rosborough assigned to this case and she indicated that the United States is not opposed to this motion. As previously argued, Mr. Harkrider can continue to be supervised by telephone contacts, email, text and any other condition this Court deems appropriate. Mr. Harkrider has been in telephone contact every few days with his probation officer in Texas as directed by the Court.

Conclusion

Mr. Harkrider can continue to be monitored by Pretrial Services in this heroic volunteer effort. There is no threat to the community posed by Mr. Harkrider which is evidenced by his cooperation with law enforcement authorities

