

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 FINAL 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 one more time to allow him to volunteer his time for two weeks. Specifically, Mr. Harkrider asks the Court to allow him to volunteer with the Ward 7 Citizens Club to provide final emergency hurricane relief in Louisiana. The Ward 7 Citizens Club in Chauvin, Louisiana, which is distributing much needed food and supplies to families whose homes are still not repaired and/or livable.

Argument

The current situation in Louisiana is that citizens are still suffering the effects from Hurricane Ida and the ravages of the storm. 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.

This Court graciously allowed Mr. Harkrider to volunteer during Hurricane Ida, which he did for nearly three weeks. He saved multiple individuals from flood waters. This included route clearance and removing fallen trees from houses with chainsaws, delivering food, fuel and generators to people who could not take care of themselves. He also set up, organized and maintained a distribution center. His help was a huge success and a wonderful gift to the citizens of Louisiana. It allowed Mr. Harkrider to do something meaningful which was a gift to him.

Undersigned counsel contacted pretrial services on October 28, 2021, who advised that Mr. Harkrider has been compliant and has no opposition to this motion. Undersigned counsel has also contacted AUSA's assigned to this case and indicate that the United States who defer to Pretrial Services. 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 would be supervised by Kiesha Foret and Kendall Williams. Undersigned counsel has their personal phone numbers and can forward them to Pretrial for supervision purposes.

#### 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/\_\_\_\_\_  
Kira Anne West  
DC Bar No. 993523  
712 H Street N.E., Unit 509  
Washington, D.C. 20002  
Phone: 202-236-2042  
kiraannewest@gmail.com  
Attorney for Mr. Harkrider

**CERTIFICATE OF SERVICE**

I hereby certify on the 1st day of November, 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