

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 TEMPORARILY MODIFY BOND CONDITIONS TO
ALLOW VOLUNTEER WORK AFTER TORNADO DEVASTATES KENTUCKY**

Mr. Alex Harkrider, through his attorney, Kira Anne West, respectfully requests that this Honorable Court temporarily modify his conditions of release to allow him to volunteer his time for two weeks for the citizens for Kentucky due to the devastation caused by tornados. Specifically, Mr. Harkrider asks the Court to allow him to volunteer with a church in Kentucky. Mr. Harkrider has contacted the church and spoken to the leader of relief efforts. As the Court is aware, before his arrest in this case, Mr. Harkrider was a volunteer with Rescue the Universe. Rescue the Universe is a 501(c)(3) volunteer disaster relief non-profit organization. The organization was founded in 2019 and had thousands of Facebook followers. Mr. Harkrider will be supervised by a volunteer coordinator in Kentucky.

Argument

The current situation in Kentucky is that citizens are suffering the effects from the and the ravages of the tornado that touched down on December 10-11, 2021. As previously presented by the defense, Mr. Harkrider has a long history of volunteerism. This Court graciously allowed Mr. Harkrider to volunteer three times during Hurricane Ida, which he did for nearly six weeks total. He saved multiple individuals from flood waters. His relief efforts also 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. He would do similar work in Kentucky. Mr. Harkrider is willing to give up his Christmas holiday with his family to do this volunteering and will not leave until after the December 20, 2021 status hearing before this Court.

Undersigned counsel contacted pretrial services on December 14, 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 defer to Pretrial Services. As presented in previous motions to modify, Mr. Harkrider can continue to be supervised by telephone contacts, email, text and any other condition this Court deems appropriate. The

I hereby certify on the 15th day of December, 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