

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 EXTENDED 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 extend his volunteer time for two more weeks for the citizens for Kentucky due to the devastation caused by December tornados. Specifically, Mr. Harkrider asks the Court to allow him to volunteer with a church in Kentucky in the town of Dawson Springs, Kentucky. Mr. Harkrider was there for 10 days and returned back to Texas to meet with his lawyers. As the Court is aware, before his arrest in this case, Mr. Harkrider was a volunteer with Rescue the Universe. Mr. Harkrider will continued to be supervised by the same volunteer coordinator in Kentucky that recently supervised him.

Argument

The current situation in Kentucky is that citizens are still suffering the effects from 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 included route clearance and removing fallen trees from houses with chainsaws, delivering food, and 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 also a gift to him. He would continue to do similar work in Kentucky. Mr. Harkrider gave up his Christmas holiday with his family to do this volunteering. He was able to accomplish a great deal while there, but has been asked to return to help. While there, he assisted with cutting down trees, re-roofing, boarding up windows, cleaning up debris and hauling it off, and he passed out hot meals throughout the neighborhoods in Dawson Springs. He did this from sun up to sun down each day, including Christmas Day.

Undersigned counsel contacted pretrial services on January 1, 2022, but was unable to reach Ms. Holman who previously advised that Mr. Harkrider has been compliant and previously had no opposition to this motion. Undersigned counsel

has also contacted both AUSA's assigned to this case without a response but who previously indicated that the United States defers 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 volunteer coordinator whom Mr. Harkrider has been supervised by in Dawson Springs will be happy to confirm this volunteer request with Pretrial Services officer Holman here in D.C. and the pretrial officer in Texas as well. Undersigned counsel has her personal phone number in Kentucky and can forward it to Pretrial for supervision purposes.

Conclusion

Mr. Harkrider can effectively be monitored by Pretrial Services for this continued 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 3rd day of January, 2022, 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