

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 PERMANENTLY MODIFY BOND
CONDITIONS TO ALLOW FOR MEDICAL AND DENTAL TREATMENT AT THE
VA HOSPITAL**

Mr. Alex Harkrider, through his attorney, Kira Anne West, respectfully requests that this Honorable Court permanently modify his conditions of release to allow him travel to the VA hospital in Shreveport, Louisiana, which is located in the Western District of Louisiana. Specifically, Mr. Harkrider asks the Court to allow him to travel to the VA hospital when needed with the condition that he advise his pretrial services officer when he is going and for how long.

As the Court is aware, Mr. Harkrider has been the picture of the perfect pretrial detainee since this Court gave him his conditions of his release almost a year ago. He has no infractions and has done his best to do everything the Court has ordered.

Mr. Harkrider currently has a dental situation which requires travel to the VA Hospital and will certainly require follow up appointments. Mr. Harkrider

states that his pretrial officer in Texas requires a motion be filed for him to go to the VA hospital. This is correct as the conditions of release state “Court to approve all travel outside Eastern District of Texas.” *See* Conditions of release, page 2, paragraph 7(f), ECF No. 34. Although correct, it hardly seems practical. The VA hospital is actually just barely over the Texas border, and approximately 45 minutes from Mr. Harkrider’s home. As written, Mr. Harkrider can travel two hours to the west and beyond Dallas, Texas, but not to the VA hospital which is much closer.

Undersigned counsel contacted AUSA Luke Jones and he indicated that the United States has no opposition. 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.

Conclusion

Mr. Harkrider can effectively be monitored by Pretrial Services when he travels to and from the VA hospital. 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,

