

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 AND TRAVEL WITHIN A 300 MILE RADIUS**

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 within a 300 mile radius of his home due to the potential for tornados in these areas and his specialized skills in rescue and storm volunteer work. Specifically, Mr. Harkrider asks the Court to allow him to volunteer with relief efforts within the defined radius as the Spring and Summer seasons present a high risk for severe storms in this area and the ability to move quickly after a disaster can impact the effectiveness of the relief and possibly save lives. 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 on any

rescue missions he participates in this year as has been the case in the past. All of Mr. Harkrider's previous volunteer efforts have been an incredible help to communities that are torn apart by storms. Additionally, Mr. Harkrider's son is participating in the State Ensemble Competition in Austin, Texas on May 28-30, 2022 and he respectfully requests the ability to travel there to accompany his son.<sup>1</sup>

### Argument

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 within the 300 mile radius requested and could be able to move in immediately where needed if the court were to grant this motion.

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<sup>1</sup> Undersigned counsel will be preparing for trial and in trial during the month of June and therefore is filing this motion now in the event June becomes unmanageable timewise.



