

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 ALLOW DEFENDANT TO TRAVEL TO MARINE  
REUNION IN FLORIDA**

Mr. Alex Harkrider, through his attorney, Kira Anne West, respectfully requests that this Honorable Court allow Mr. Harkrider to

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 requests that he be allowed to travel to Florida for 4 days in August to meet with Marines that he served with during his tour in Afghanistan.

Undersigned counsel contacted AUSA Brasher and he indicated that the United States does oppose this request as they do not oppose volunteer work, but do oppose social visits and vacations. 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. In fact, Pretrial Services in Texas and in D.C. do not oppose this request.

This is not a “vacation” but it could be termed a social visit in the sense that Mr. Harkrider would appreciate being able to connect with his brothers in arms with whom he selflessly served this great country of ours. Mr. Harkrider counts his time serving this country as an obligation and privilege of citizenship. The bonds he formed with fellow Marines during this service continue to support him as he continues to support them. As a society, we have fallen short in the support of our military veterans. Mr. Harkrider wants to not only see his fellow marines for his own wellbeing (the Court knows of Mr. Harkrider’s past medical issues and trauma caused by his service), but to assure them that they are not left behind or forgotten. This is a form of therapy not only for Mr. Harkrider, but his fellow marines.

### Conclusion

Mr. Harkrider can effectively be monitored by Pretrial Services when he travels to and from Florida. 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 21st day of July, 2022, a copy of same was delivered to the parties of record, by ECF pursuant to the Covid standing order and the rules of the Clerk of Court.

\_\_\_\_\_/S/

Kira Anne West