

**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 IN LIMINE**

Mr. Alex Harkrider, through his attorney, Kira Anne West, respectfully files this motion in limine and states the following in support:

The following should not be mentioned or alluded to in the trial of this case:

1. Any news reports during and after January 6, 2021 that mention police personnel that died. Mr. Harkrider had no role in that.
2. Any reference to President Trump’s (hereinafter “Trump”) stop the steal lawsuits, court challenges, or issues raised by Trump’s lawyers about the election and outcomes of those lawsuits. Mr. Harkrider is not an attorney and the legal significance of any lawsuits brought by parties, unrelated to Mr. Harkrider, to challenge the elections is irrelevant to Mr. Harkrider’s conduct on January 6, 2021 and should be excluded.
3. Any reference to the proud boys, patriot boys, three percenters or oath keepers. This includes any information regarding the Oath Keepers using a

hotel in Virginia to stage weapons in the event that martial law was declared on January 6, 2021. There is not one scintilla of evidence that Mr. Harkrider knew of this operation or was a member of any of these groups. He is a member of the U.S. Marines and not any of these organizations.

4. Any photos taken from Mr. Harkrider's phone that are irrelevant to this case. This may go on a photo by photo basis. Any photographs not related to the events of January 6<sup>th</sup> including but not limited to Mr. Harkrider's personal life.
5. Any reference to Mr. Harkrider's prior and negligible criminal history.
6. Any reference to guns legally brought to the state of Virginia by Mr. Harkrider and any reference to guns in general, including those found at the search of Mr. Harkrider's home. They have no bearing on the charges in this case. Most Texans have multiple firearms in their homes, especially Marines.
7. Parts of Mr. Harkrider's recorded statement bring up *Bruton* issues. The parties have discussed this and are working on a joint submission to the Court.
8. Mr. Harkrider's mug shot.
9. Any "tags" from co-defendant Ryan Nichols or anyone else on Facebook or any other social media.

10. Summary witnesses that testify about things surrounding the events of January 6 that have nothing to do with Mr. Harkrider or his charges. This includes the interior of the Capitol such as the Rotunda, Nancy Pelosi's many offices, the Crypt, the Memorial doors, the breaching of the Senate doors, the Hall of Columns and any other place irrelevant to Mr. Harkrider. For example, this Court probably knows there was a battle in the Rotunda between police and protestors. Mr. Harkrider was never in the Rotunda. Therefore, it's irrelevant.

Respectfully submitted,

KIRA ANNE WEST

By:                                 /s/                                  
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**CERTIFICATE OF SERVICE**

I hereby certify on the 29<sup>th</sup> 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