

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 TEMPORARILY MODIFY BOND
CONDITIONS TO ALLOW VOLUNTEER WORK FOR HURRICANE IAN RELIEF**

Mr. Alex Harkrider, through his attorney, Kira Anne West, respectfully requests that this Honorable Court temporarily modify his conditions of release again to allow him to volunteer his time for two weeks. Specifically, Mr. Harkrider asks the Court to allow him to volunteer for emergency hurricane relief in the Tampa, Florida area as hurricane Ian bears down on the state. As the Court may recall, Mr. Harkrider has done many rescue missions since being on pretrial release. Last year, for example, he worked in Ward 7 in Chauvin, Louisiana, distributing much needed food and supplies to families whose homes are were not repaired and/or livable.

Argument

The current situation in Florida is that citizens will suffer the effects from Hurricane Ian and the ravages of the storm. As previously presented by the

defense, Mr. Harkrider has a long history of volunteerism, specifically with hurricane rescues which he did for several years prior to his arrest in this case. This Court graciously allowed Mr. Harkrider to volunteer during Hurricane Ida, which he did for nearly three weeks. He saved multiple individuals from flood waters. This 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. We expect the same type of hurricane relief will be needed in Florida in the next couple of days and for a period of two weeks thereafter.

Undersigned counsel contacted pretrial services after hours on September 27, 2022, and is waiting to hear from them. Undersigned counsel has also contacted AUSA Brasher who does not oppose this motion. As previously argued, Mr. Harkrider can continue to be supervised by telephone contacts, email, text and any other condition this Court deems appropriate. Mr. Harkrider would be supervised by a fellow marine in the Tampa area. Undersigned counsel has the personal phone number and address and can forward them to Pretrial for supervision purposes.

Conclusion

Mr. Harkrider can effectively be monitored by Pretrial Services for this 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 and volunteerism 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 27th day of September, 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