

IN THE SUPREME COURT OF THE UNITED STATES

EDWARD DAVIS, PETITIONER

v.

UNITED STATES OF AMERICA

ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE EIGHTH CIRCUIT

REPLY MOTION TO THE GOVERNMENT'S OPPOSITION

Edward Davis (PRO SE)
Reg. No. 23413-047
U.S. Penitentiary
P.O. Box 1000
Leavenworth, KS 66048

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Petitioner Edward Davis (hereinafter "Petitioner"), replies through PRO SE, to the Government's Opposition to his Petition for Writ of Certiorari, and contends that the Government **ERRS** in citing and using the Brief for the United States in Opposition in BRYAN MARK JOHNSON v. UNITED STATES, No. 19-7079, for the following reasons:

[1] Bank robbery under § 2113(a) is [NOT] a "crime of violence, OR BY INTIMIDATION," the offense can [a]lso be committed by the means of entering a bank "with intent to commit in such bank... any felony affecting such bank... OR ANY LARCENY."

Whereby, Movant contends that § 2113(a) is [I]NDIVISIBLE

and that the latter clause shows that bank robbery can be committed [WITHOUT] using physical force. Hence, this is NOT the same issues raised in BRYAN MARK JOHNSON v. UNITED STATES, No. 19-7079, and this Honorable Court should GRANT Certiorari and APPOINT COUNSEL.

Respectfully submitted,


Edward Davis (PRO SE)
Reg. No. 23413-047
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Leavenworth, KS 66048

CERTIFICATE OF SERVICE

I, Edward Davis, hereby certify that on this 16th, day of April, 2021, I did in fact hand-delivered a true and correct copy of this Reply Motion, to the U.S. Penitentiary Prison Mailroom Staff, as provided by the [MAILBOX RULE] pursuant to HOUSTON v. LACK, 487 U.S. 266 (1988), to be U.S. Mailed by the method indicated to all counsel of record listed below, including this Honorable U.S. Supreme Court Clerk's Office:

(U.S. FIRST CLASS MAIL)

ELIZABETH B. PRELOGAR
ACTING SOLICITOR GENERAL
COUNSEL OF RECORD
DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530-0001

I declare under penalty of perjury pursuant to the laws of the United States, Title 28 U.S.C. § 1746, that the foregoing is true and correct.

E. D.
Edward Davis