

No. 20-7223

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IN THE SUPREME COURT OF THE UNITED STATES

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ANGELO C. DOUGLAS,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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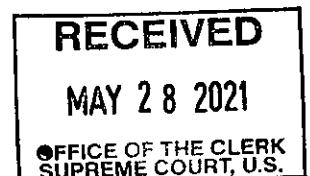
ON PETITION FOR A WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE EIGHTH CIRCUIT

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REPLY MOTION TO THE GOVERNMENT'S OPPOSITION

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Angelo C. Douglas (PRO SE)  
Reg. No. 30337-047  
U.S. Penitentiary  
P.O. Box 1000  
Leavenworth, KS 66048



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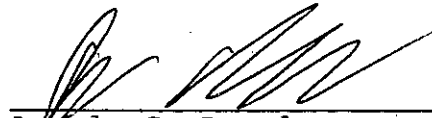
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Petitioner Angelo C. Douglas (hereinafter "Petitioner", replies through PRO SE, to the Government's Opposition to his petition for Writ of Certiorari, and contends that the Government **ERRS** in citing and using the Brief for the United States in 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,



Angelo C. Douglas  
Reg. No. 30337-047  
U.S. Penitentiary  
P.O. BOX 1000  
Leavenworth, KS 66048

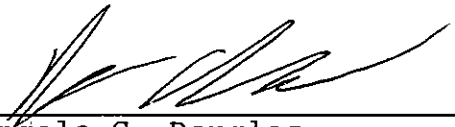
**CERTIFICATE OF SERVICE**

I, Angelo C. Douglas, hereby certify that on this 8<sup>th</sup> day of May, 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.



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Angelo C. Douglas